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February 29, 1988

William G. Council
Executive Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
SMALL BREAK LOCA MODE 4 OPERATION
SDAR: CP-86-41 (INTERIM REPORT)

Gentlemen:

On May 28, 1986, we verbally notified your Mr. I. Barnes of a deficiency, involving small break LOCA evaluations regarding the effects of the operational status of plant equipment during Mode 4 operation. This is an interim report of a potentially reportable item under the provisions of 10CFR50.55(e). Our most recent interim report was logged TXX-6511, dated June 12, 1987.

The Westinghouse Owners Group (WOG) plan to apply Leak Before Break (LBB) Technology for the program of the LOCA in modes 3 and 4 was not accepted by the NRC. Presently, the WOG is approaching the issue in two steps. The first step is to utilize Probabilistic Risk Assessment (PRA) methods to demonstrate that a LOCA with the break size larger than 6" in modes 3 and 4 is less probable than modes 1 and 2. The second step will be defining operator response time for the accident. Currently, a best-estimate computer code (TREAT) is utilized for the accident analysis to define the accident sequence. The accident analysis results will then be used for the preparation of operator procedural guidance. As a member of WOG, TU Electric is closely following not only the computational results but also the final procedural guidance which will be implemented on the CPSES operator's procedure.

The WOG plans to meet again in March and issue a final report in June. We anticipate submitting our next report by August 12, 1988.

Very truly yours,

W. G. Council
W. G. Council

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c-Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (3)

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