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August 9, 1989

William J. Cahill, Jr.
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
SUPPLEMENTAL EVALUATION OF RESIDUAL HEAT REMOVAL (RHR) LINES THERMAL STRATIFICATION AND LEAK-BEFORE-BREAK QUALIFICATION FOR THE COMANCHE PEAK UNIT 1

REF: TU Electric Letter (TXX-89246) from William J. Cahill, Jr. to the NRC dated May 9, 1989

Gentlemen:

A public meeting was held on July 27, 1989 at the NRC office among representatives of the NRC, TU Electric, and Westinghouse to discuss TU Electric's plan to submit a supplement to the evaluation transmitted by the above referenced letter. The supplemental evaluation demonstrates that the RHR piping integrity will be maintained during plant operation and that the leak-before-break criteria are satisfied. The supplemental evaluation concludes that the piping complies with the ASME III Code and presents a comprehensive monitoring program to confirm the analyses contained therein. This letter provides the supplemental evaluation and monitoring program administrative details in a total of one attachment and three enclosures. The presentation slides used in the July 27, 1989 public meeting are provided as an appendix to enclosures one and two. During the finalization of the monitoring program details the frequency for collection of data during critical periods was changed from two minutes, as presented in the July 27, 1989 public meeting, to three minutes to facilitate data collection automation.

The attachment provides an overview of the manner in which the monitoring program is to be conducted and administrative measures taken to address issues arising from the monitoring program in a timely manner.

The first enclosure consists of five (5) copies of WCAP-12258 Supplement 2, entitled "Evaluation of Thermal Stratification for Comanche Peak Unit 1 Residual Heat Removal Lines (RHR)" (Proprietary).

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LPDR	1	INP
NSIC	1	INP
NRC PDR	1	INP

The second enclosure consists of five (5) copies of WCAP-12259 Supplement 2, entitled "Evaluation of Thermal Stratification for Comanche Peak Unit 1 Residual Heat Removal Lines (RHR)" (Non-Proprietary).

The third enclosure consists of a Westinghouse Application for Withholding, CAW-89-91, Accompanying Affidavit, CAW-88-129, and Proprietary Information Notice.

As this submittal contains information proprietary to Westinghouse Electric Corporation, it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10CFR2.790.

Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10CFR2.790. Correspondence with respect to the proprietary aspects of the Application for Withholding or the Supporting Westinghouse Affidavit should be addressed to Mr. R. A. Wiesemann, Manager, Regulatory and Legislative Affairs, Westinghouse Electric Corporation, P. O. Box 355, Pittsburgh, Pennsylvania 15230.

Sincerely,

William J. Cahill, Jr.

HAM/vld
Attachment
Enclosures

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

Monitoring Program Details

As described in Section 3.0 of enclosures one and two, a monitoring program will be implemented at CPSES Unit 1 for the two RHR suction lines. This attachment provides additional details of this monitoring program.

Cabling from the RTD's are all connected to a data acquisition system for collection of monitoring data. Prior to commencement of temperature data collection, installed RTDs will be inspected, their actual locations will be recorded, and they will be verified to be operable and recording reasonable ambient temperatures.

Recorded temperature data will be collected, and transmitted to Engineering for evaluation. Additional plant operational data, such as Reactor Coolant System (RCS) hot leg temperature, RCS flow rate, Reactor Coolant Pump status (on/off), Safety Injection status (gpm), and RHR flow rate will be recorded at approximately the same intervals as monitored temperature recordings. This data is collected by existing plant systems and will be made available to Engineering for use in the evaluation of recorded temperature data.

Temperature data which exceed established acceptance criteria will be evaluated, and recommendations for corrective action, if required, will be provided to Operations. If, during the Engineering review of recorded data, anomalies are observed which indicate a malfunction of one or more RTD's, an assessment will be made of the necessity of replacing the suspect hardware. Factors such as plant conditions, location of hardware, importance of data from the particular channel, and ALARA considerations will dictate the appropriate actions. Records of the evaluation will be maintained.

Collection of data by Operations and reduction/evaluation of data by Engineering will be administratively controlled by appropriate level procedures to assure that the monitoring program effectively addresses the potential for stratification in the RHR lines. This monitoring will continue until sufficient data is developed, either through industry generic or plant specific programs, to justify discontinuance, and the NRC concurs in this conclusion.