

April 23, 1984

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Phillips Building  
7920 Norfolk Avenue  
Bethesda, Maryland 20014

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION  
DOCKET NOS. 50-445 AND 50-446  
ELIMINATION OF LARGE PRIMARY LOOP PIPE  
RUPTURES

REF: a) TUSI Letter No. TXX-4069, dated 10/31/83, Schmidt to  
Youngblood

b) NRC letter to TUGCO dated 3/2/84, Youngblood to Gary

Dear Mr. Denton:

The reference (a) letter informed the NRC that TUGCO was evaluating the technical feasibility and potential benefits of eliminating postulated pipe breaks in the RCS primary loop from the structural design basis of the Comanche Peak Units 1 and 2. As part of that letter, Westinghouse reports MT-SME-3135 (and MT-SME-3136), "Technical Bases for Eliminating Large Primary Loop Pipe Ruptures as the Structural Design Basis for Comanche Peak Units 1 and 2," October 1983, Westinghouse Proprietary, were enclosed. These reports provided the type of information requested by the Staff for NRC review of the technical bases for elimination of RCS primary loop pipe breaks.

The Reference (b) NRC letter indicated that the NRC Staff had reviewed, (1) the leak-before-break analysis provided by the Reference (a) letter, and (2) the generic Westinghouse report WCAP-10456 dealing with fracture toughness of piping materials under thermal aging conditions. As a result of that review, the Materials Engineering Branch requested additional information to complete their evaluation on the subject matter.

At a meeting held March 22, 1984, with representatives of the NRC Staff, Texas Utilities, Westinghouse, the responses to the Staff requests for additional information were discussed. At that meeting, the Staff outlined the type of additional information required by the NRC. The technical information requested is enclosed as follows:

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*1/20 Prop*  
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NSIC  
BNL  
DMB/DSS  
FEMA  
LPOR  
PDR  
NTIS

*Non Prop Only*

1. Twenty (20) copies of Westinghouse Report WCAP-10527, "Technical Bases for Eliminating Large Primary Loop Pipe Rupture as the Structural Design Basis for Comanche Peak Units 1 and 2, "April 1984, Westinghouse Proprietary.
2. Twenty (20) copies of Westinghouse Report WCAP-10528, "Technical Bases for Eliminating Large Primary Loop Pipe Rupture as the Structural Design Basis for Comanche Peak Units 1 and 2," April 1984, Non-Proprietary.

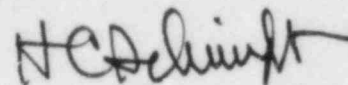
Also enclosed is one (1) Application for Withholding, CAW-84-35.

WCAP-10527 is a new report (Proprietary and Non-Proprietary versions as appropriate) prepared specifically for the Comanche Peak Units 1 and 2. This new report incorporates the previous material in Westinghouse report MT-SME-3135 along with the additional information addressing MEB Items 121.16, 121.17, 121.18 and 121.19. For Item 121.20, an assessment of margins considering the loads, flaw size, and material toughness for the Comanche Peak Units 1 and 2 RCS piping material is also included. Results covering the elastic-plastic fracture mechanics analysis of the 4-inch thermally aged pipe in WCAP-10456 is expected to be completed in June 1984 and will be transmitted at that time.

As Enclosure 1 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 Section 2.790 of the Commission's regulations.

Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10CFR Section 2.790 of the Commission's regulations. Correspondence with respect to the proprietary aspects of the Application for Withholding or the supporting Westinghouse affidavits should reference CAW-84-35, and should be addressed to R. A. Wiesemann, Manager, Regulatory and Legislative Affairs, Westinghouse Electric Corporation, P.O. Box 355, Pittsburgh, Pennsylvania 15230.

Very truly your,



H. C. Schmidt

HCS/grr  
Attachments