



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUL 03 1985

Docket Nos.: 50-445
and 50-446

Mr. M. D. Spence
President
Texas Utilities Generating Company
400 N. Olive Street
Lock Box 81
Dallas, Texas 75201

Dear Mr. Spence:

Subject: Use of ASME Code Edition and Addenda for the Comanche Peak
Steam Electric Station (Units 1 and 2)

The NRC staff has received your request for approval to use a later ASME Code Edition and Addenda than that currently in the Code and Standard Rule (10 CFR 50.55a), identified in a TUGCO letter dated December 21, 1984. Before addressing your specific request, the staff has asked that we clarify to TUGCO the applicability of ASME Code Editions and Addenda, as well as the scope of the 10 CFR 50.55a rule, in order to resolve any misunderstandings on the part of your staff.

The most recent version of 10 CFR 50.55a, dated March 30, 1984, approves the editions of Section III of the ASME Boiler and Pressure Vessel Code, through the 1980 Edition and Addenda through the Summer 1982, and is only applicable to Code Class 1, 2 and 3 components. The rule does not address Section III components such as: Class MC (Subsection NE); Supports (Subsection NF); and Core Support Structures (Subsection NG). The NRC staff is currently in the process of approving additions to Section III of the Code through the 1983 Edition and Addenda through the Summer 1984, that are also only applicable to Code Class 1, 2 and 3 components. As currently written, this new revision of the rule does not address such components as those constructed to Subsections NE, NF and NG of Section III, as noted above. Caution should be exercised by your staff in the use of Code Editions and Addenda for which approval is pending. Use of any such Code Editions and Addenda is at TUGCO's own risk.

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A PDR

JUL 03 1985

While NRC staff approval is not required by 10 CFR 50.55a to utilize a later Code Edition and Addenda of Subsection NF (Section III) of the Code, staff approval of the standard used for the construction of the component supports is required by General Design Criterion 1 of 10 CFR 50. Implementation of a later Code Edition and Addenda must be in conformance with NCA-1140 of both the later Code Edition and Addenda of Section III, and the Code of record for the facility. It is the responsibility of TUGCO to ensure that all related provisions of the Code are adhered to, particularly when selected paragraphs and tables of a later Code Edition and Addenda are used in conjunction with the Code of record. To that end TUGCO shall prepare a listing for NRC staff review of those Code provisions TUGCO considers related and with which it will comply. The list shall be compiled from the later editions and addenda specified in the December 21, 1984 letter corresponding to the eight selected paragraphs or tables requested to be used. NCA-1140(f) requires plant owners to determine the acceptability of both the Code Edition and Addenda established in the design specification, and in later revisions of the design specification with regulatory authorities such as the NRC.

Since your request for approval to use the later ASME Code Edition and Addenda was received when the design of Comanche Peak Units 1 and 2 is largely completed, provide the reasons and basis for requesting the revision to earlier design commitments. Since there is extensive testimony by your representatives and the staff on the use of Section III of the ASME Code for Comanche Peak, the staff requests that you perform a careful review of the hearing record to identify whether (and in what manner) each of the request items may affect the earlier testimony before the ASLB. In addition, the staff requests that you identify whether (and in what manner) the request items may relate to:

- (a) The Motions for Summary Disposition submitted by TUGCO concerning piping and pipe supports;
- (b) Matters which were reviewed by Cygna in the Independent Assessment Program;
- (c) The comments of the NRC's Technical Review Team;
- (d) The comments of the NRC's Special Review Team;
- (e) The comments of the NRC's Construction Appraisal Team.

With respect to your December 21, 1984 request, the NRC staff finds the use of the listed portions of ASME Code Section III Subsection NF acceptable when the following have been implemented:

- (a) Identify in the FSAR affected component supports (i.e., by systems and supports) to which the later Code requirements are to be applied;

Mr. M. D. Spence

- 3 -

JUL 03 1985

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- (c) TUGCO shall assure that all code related requirements have been met; a listing of the related requirements shall be submitted for NRC staff review as discussed above.
- (c) Applicable design specifications and required design documents shall be revised.

Further, we request that you consider whether a Construction Permit amendment is necessary. If not, please provide your rationale.

Should there be further questions concerning this subject, please contact the Project Manager.

Sincerely,

ORIGINAL SIGNED BY:

Vincent S. Noonan, Director
for Comanche Peak Project
Division of Licensing

cc: See next page

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JUL 03 1985

Mr. M. D. Spence
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Comanche Peak Steam Electric Station
Units 1 and 2

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