

TEXAS UTILITIES GENERATING COMPANY  
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

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August 30, 1985

WILLIAM G. COUNCIL  
EXECUTIVE VICE PRESIDENT

Director of Nuclear Reactor Regulation  
Attention: Mr. Vincent S. Noonan, Director  
Comanche Peak Project  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION  
DOCKET NOS. 50-445 AND 50-446  
PIPE SUPPORT DESIGN

Dear Mr. Noonan:

On August 6, 1985, Mr. Bob Masterson inquired whether it was the practice of any of the Comanche Peak pipe support design organizations to use the increased stress limits of NF 3231.1 (a) (three times the stress limits of XVII-2000). As Mr. Finneran has noted in the ASLB record for CPSES (see September 19, 1984, affidavit of John C. Finneran, Jr. in Support of Applicants' Reply to CASE's Answer to Applicants' Motion for Summary Disposition Regarding Consideration of Friction Forces, page 3, footnote 1), it is not the standard practice of Comanche Peak pipe support design organizations to use these increased allowables, even when friction loading is included in the loading combinations. These increased allowables were used in the assessment of one of the six supports in Mr. Finneran's friction affidavit simply to assess the significance of the issue. This same approach was used in isolated instances in other affidavits for the same purpose (see e.g., June 18, 1984, affidavit supporting the Motion for Summary Disposition Regarding Consideration of Local Displacements and Stresses).

In summary, the increased allowables are not used in our normal design practice. They have been used in isolated instances in some Motions for Summary Disposition to assess the safety significance of particular issues.

Very truly yours,

*W. G. Council*  
W. G. Council

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