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Washington Public Power Supply System

P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000

August 5, 1983
G02-83-701

Docket No. 50-397

Mr. D. M. Sternberg, Chief
Reactor Projects Branch 1
Nuclear Regulatory Commission
Region V
1450 Maria Lane
Suite 210
Walnut Creek, California 94596

Subject: NUCLEAR PROJECT NO. 2
NRC INSPECTION 83-22, NOTICE OF DEVIATION

Reference: Letter D. M. Sternberg to C. S. Carlisle,
dated July 5, 1983

The Washington Public Power Supply System hereby provides a reply to the Notice of Deviation transmitted as Appendix A via the Reference letter. Our reply consists of this letter and Attachment 1, which contains our response to the Notice of Deviation.

If you have any questions or desire further information, please contact Phil Harness at (509) 377-2501, extension 2854.


C. S. Carlisle
Program Director, WNP-2

PWH:ch

Attachment: As stated

cc: Mr. W. S. Chin - BPA
Mr. N. D. Lewis - EFSEC
Mr. A. D. Toth, NRC Resident Inspector
Document Control Desk, NRC

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ATTACHMENT 1

NOTICE OF DEVIATION

Washington Public Power Supply System
P. O. Box 968
Richland, Washington 99352

Docket No. 50-397
Construction Permit No. CPPR-93

As a result of the inspection conducted on May 1-31, 1983, and in accordance with the NRC Enforcement Policy, 10 CFR Part 2 Appendix C, 47 FR 9887 (March 9, 1982), the following deviation was identified:

Paragraph 3.2.3 of the FSAR states that piping system supports shall be appropriate for the components supported as defined by the ASME Code Section III. The ASME Code Section III NF-1510(d) defines a non-integral pipe support as one which "bears on the pressure boundary component" and NF-1511 states that "the jurisdictional boundary between a building structure and a non-integral support shall be the surface of the building structure."

Contrary to the above, on April 9, 1982, the architect engineer issued drawing H-501, sheet three, which allowed non-integral supports to be excluded from the construction and inspection requirements of ASME Section III, subsection NF even though the non-integral supports extend beyond the building surface structure into the jurisdictional boundary of the ASME Code."

You are hereby requested to submit to this office within thirty days of the date of this Notice, a written statement or explanation regarding the item of deviation, describing corrective action taken, the results achieved (or corrective steps that are planned), and the date when corrective action will be completed.

Supply System Response:

The Supply System position in regard to the Notice of Deviation is that the subject supports are in question because of differences in ASME Code interpretation and that regardless of interpretation, equivalency between the NF and AISC support members has been demonstrated.

WNP-2 committed in the FSAR to design component supports in accordance with the Winter 1973 Addenda in order that the design rules of NF could be used. This decision was a voluntary upgrade of criteria since the mandatory code would have been Summer 1973. Component supports under Summer 1973 would have been designed in accordance with ANSI B31.7 -1969 for ASME Class 1 and B31.1-1967 for ASME Class 2 or 3.

NF section was intended to provide design rules for support members which connect AISC structural building members and standard component supports. There was no ASME definition for building structures. Further, ASME Code interpretations have indicated that the requirements of NF 1000 (jurisdictional boundaries) are only a guideline and that it is the Owner's responsibility to define the Code jurisdictional boundaries. The following ASME Code interpretations clarify this responsibility: III-1-78-47; III-1-78-58; III-80-51; and III-80-138. These interpretations repeatedly state two Owner responsibilities: definition of the jurisdictional boundaries and assurance of compatibility between boundaries and corresponding loads. The Supply System has met both requirements.

At WNP-2, the rules of NF are used for the design of both ASME and the AISC support members. The materials specified and the allowable stresses used are identical.

Welding used for the AISC support meets the requirements of the AWS D1.1 structural code. No impact testing is required by either code for AISC or the ASME supports. The principal differences between AISC supports and ASME supports is in the transfer of material markings and material traceability of support members and in the non-destructive examination of ASME Class 1 support members following erection.

The ASME Code does not require the use of an authorized inspector, Code Data reports or Code stamping of ASME supports for WNP-2.

For the reasons stated above and because the FSAR commitment of design to ASME Subsection NF was met, we believe that there is equivalency between the NF and AISC support members. Additionally, the Supply System is consistent with industry practice, having similar if not identical NF boundaries as the following plants:

- Palo Verde 1, 2, and 3
- South Texas 1 and 2
- San Onofre 2 and 3
- Wolf Creek
- Calloway
- Vogel

No corrective action has been taken or is planned with regard to the AISC/NF boundary, however a clarification of FSAR paragraph 3.2.3 will be made by September 1, 1983.