

May 16, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	Docket Nos. 50-445 and
TEXAS UTILITIES ELECTRIC)	50-446
COMPANY, ET AL.)	
)	(Application for
(Comanche Peak Steam Electric)	Operating Licenses)
Station, Units 1 and 2))	

APPLICANTS' STATEMENT OF MATERIAL
FACTS AS TO WHICH THERE IS NO
GENUINE ISSUE REGARDING APPLICANTS'
CONSIDERATION OF DAMPING FACTORS
FOR OBE AND SSE LOADING CONDITIONS

1. Piping systems are not "active systems," as that term is used in Regulatory Guide 1.61 (Iotti Affidavit at 3).
2. Applicants use 1 and 2 percent critical damping response spectra for the OBE and SSE evaluations, respectively, for small diameter (12" and under) piping systems. These are the damping factors set forth in Regulatory Guide 1.61. (Iotti Affidavit at 3.)
3. The piping seismic analysis for support CS-1-235-067-C41K used damping values of 1 and 2 percent critical damping. (Iotti Affidavit at 3-4).

4. Piping stress analysis problem 1-41, which includes support CS-1-235-067-C41K, used 2 and 4 percent critical damping for calculating the coupling factor. This assumption is conservative. (Iotti Affidavit at 4-5.)
5. Applicants use different seismic spectra for OBE and SSE events, as appropriate for the two types of events. Use of these spectra is not related to the selection of damping factors. (Iotti Affidavit at 5.)
6. Damping factors other than those specified in Regulatory Guide 1.61 were used for the Westinghouse reactor loop configuration. Use of these different factors was justified by analyses, as an exception to Regulatory Guide 1.61. (Iotti Affidavit at 5-6.)