

CASE**(CITIZENS ASSN. FOR SOUND ENERGY)**1426 S. Polk
Dallas, Texas75224
DOCKETED
USNRC

214/946-9446

March 15, 1984

'84 MAR 19 A10:29

EXPRESS MAILMr. David R. Pigott
Orrick, Herrington, & Sutcliffe
600 Montgomery Street
San Francisco, California 94111OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Dear Mr. Pigott:

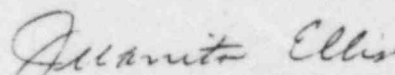
Subject: In the Matter of
Texas Utilities Generating Company, et al.
(Comanche Peak Steam Electric Station,
Units 1 and 2)
Docket Nos. 50-445 and 50-446We are attaching some further responses from Mr. Walsh regarding Cygna's
March 13, 1984, responses to CASE.

Since, as we understand it, Cygna will be sending two more mailing of six items each (to arrive today and tomorrow), we may not be able to get any further responses to you by Friday unless your offices or those of Cygna will be open on Saturday, March 17. Please let me know whether and where we can send such responses. In the alternative, please let me know which hotel you anticipate that you (if you are going to attend next week's hearings), Ms. Williams, or Mr. Ward will be staying at and when you expect to arrive so that we can bring additional responses, if necessary, to your hotel when you arrive.

Thanks.

Sincerely,

CASE (Citizens Association for Sound Energy)


(Mrs.) Juanita Ellis, President

Attachments

cc: Ms. Nancy H. Williams - Cygna

Service List

Footnote to Ms. Williams -- In the off-the-record conference call yesterday between the Board and parties, in which Mr. Pigott participated, we were asked to begin sending information to Mr. Pigott rather than direct to you. However, since time is so short, we are sending both of you copies of the attached to expedite things.

je

8403200025 840315
PDR ADOCK 05000445
PDR

DS03

Walsh Question #6, item a in Cygna's response:

Did Cygna investigate the channel bent about its axis for the combined stress due to the three-way restraint action; also, for the effects from the channel bent about its weak axis on the natural frequency of the support? If not, why not?

Walsh Question #6, item b in Cygna's response:

Did Cygna investigate the requirements for someone to be on the authorized approval list? What are the requirements?

Walsh Question #9:

What was the basis for the Applicants' using "accept as is" (i.e., engineering judgement)? Did this consider the effects of the pipe's being restrained and the effect of seismic loads imposed on the support and seismic stress within the pipe wall? Was the pipe stress analysis group notified of this condition? Did Cygna investigate whether or not the individual whose initials (DMR) were shown on the as-built re-verification report has experience or qualifications as a structural engineer or pipe stress analyst (and was therefore qualified to make the judgement that no engineering action was required)? Why did Cygna assume that he possessed such experience or qualifications?

Walsh Questions #8 and #12:

Is it correct that the analysis utilized by Gibbs & Hill (see sheet 56/81 of Cygna tech file) did not consider peak acceleration, but considered base plates as unyielding and consequently used the response spectra acceleration assuming rigid base plates? This analysis did not include the displacements determined by Cygna base plate analyses nor did it consider the dead band

Walsh Questions #8 and 12 (continued):

displacements due to oversized holes of the base plate. By considering the above facets, would the bolt loads still be within the allowables? Include the basis for your conclusions in this regard. Also, would the values obtained be greater than the values used by Gibbs & Hill? Provide the basis for your conclusions in this regard.

In addition, it is not conservative to use lumped masses, it is just convenient, contrary to what Cygna has stated in response to Question #8. Why has Cygna stated that lumped tray masses are conservative, and neglected to consider multi-modal responses of the cable tray onto the support? Provide the basis for this. (This would be related to I&E Report 83-52 (CASE Exhibit 926), which was attached to CASE's 3/13/84 letter to you.)

Supply the math model which was utilized for the computer printout which was attached to Cygna's answer. We may also need some additional information and/or discussion regarding the printout in order to adequately evaluate and address it.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

TEXAS UTILITIES GENERATING
COMPANY, et al.

(Comanche Peak Steam Electric Station
Station, Units 1 and 2)

Docket Nos. 50-445 and
50-446

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of
CASE's 3/15/84 letter to David R. Pigott (Cygn)

have been sent to the names listed below this 15th day of March, 1984,
by: Express Mail where indicated by * and First Class Mail elsewhere.

* Administrative Judge Peter B. Bloch
U. S. Nuclear Regulatory Commission
4350 East/West Highway, 4th Floor
Bethesda, Maryland 20814

Atomic Safety and Licensing Board
Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

* Dr. Kenneth A. McCollom, Dean
Division of Engineering,
Architecture and Technology
Oklahoma State University
Stillwater, Oklahoma 74074

Alan S. Rosenthal, Esq., Chairman
Atomic Safety and Licensing Appeal
Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

* Dr. Walter H. Jordan
881 W. Outer Drive
Oak Ridge, Tennessee 37830

Dr. W. Reed Johnson, Member
Atomic Safety and Licensing Appeal
Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

* Nicholas S. Reynolds, Esq.
Bishop, Liberman, Cook, Purcell
& Reynolds
1200 - 17th St., N. W.
Washington, D. C. 20036

Thomas S. Moore, Esq., Member
Atomic Safety and Licensing Appeal
Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

* Geary S. Mizuno, Esq.
Office of Executive Legal Director
U. S. Nuclear Regulatory Commission
Maryland National Bank Building
7735 Old Georgetown Road - Room 10105
Bethesda, Maryland 20814

Atomic Safety and Licensing Appeal
Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Docketing and Service Section
(3 copies)
Office of the Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Renea Hicks, Esq.
Assistant Attorney General
Environmental Protection Division
Supreme Court Building
Austin, Texas 78711

John Collins
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Dr., Suite 1000
Arlington, Texas 76011

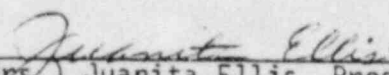
Dr. David H. Boltz
2012 S. Polk
Dallas, Texas 75224

Lanny A. Sinkin
114 W. 7th, Suite 220
Austin, Texas 78701

R. J. Gary, Executive Vice President
Texas Utilities Generating Co.
2001 Bryan Tower
Dallas, Texas 75201

* Mr. David R. Pigott
Orrick, Herrington, & Sutcliffe
600 Montgomery Street
San Francisco, California 94111

* Ms. Nancy H. Williams
Project Manager
Cygn Energy Services
101 California Street, Suite 1000
San Francisco, California 94111-5894


(Mrs.) Juanita Ellis, President
CASE (Citizens Association for Sound Energy)
1426 S. Polk
Dallas, Texas 75224
214/946-9446