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VICE PRESIDENT

March 21, 1984

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U. S. Nuclear Regulatory Commission
Region III
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ULNRC- 775

CORNER AND LADA PIPE SUPPORT SWAY STRUTS
AMENDMENT TO SNUPPS SIGNIFICANT DEFICIENCY REPORT NO. 80-3

- Ref.: 1) SLNRC 80-32 dated 7/24/80
2) SLNRC 80-49 dated 11/7/80
3) SLNRC 81-57 dated 7/13/81
4) SLNRC 81-122 dated 11/10/81

Reference 1, as supplemented by references 2, 3 and 4, forwarded to the NRC a generic report concerning defective Corner and Lada (C&L) pipe support sway struts furnished to the SNUPPS jobsites. The defect concerned the potential disengagement of the paddle/bushing assembly. Reference 3 specifically stated that conical washers would be installed in all size 2 and 3 (Figure 631) sway struts as an additional measure to preclude disengagement of the paddle/bushing assembly.

The purpose of this letter is to amend our previous response and inform the NRC that a total of twelve size 3 sway struts (representing 6 pipe supports) could potentially not have conical washers. An inspection of C&L size 2 and 3 sway struts to verify that commitments made in reference 3 were implemented, revealed 55 out of 482 without conical washers. These supports were subsequently reworked. The twelve size 3 struts mentioned above are virtually inaccessible due to their location over the spent fuel pool. Since new fuel is presently stored in the spent fuel pool, inordinate measures would be required to inspect the sway struts and prevent the entry of foreign material into the fuel pool.

With these concerns in mind, Union Electric has evaluated the specific function of these supports and concluded that they are acceptable "as-is". The following justifications were used in support of this conclusion.

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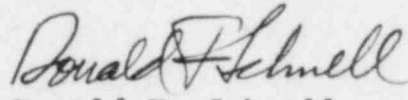
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- 1) All size 2 and 3 C&L sway struts were inspected or tested for tightness prior to use in order to confirm the tightness of the paddle/bushing assembly. This inspection plan was conducted prior to Union Electric commitments for installation of conical washers in C&L size 2 and 3 sway struts.
- 2) The 6 pipe supports are not safety-related but are classified as non-Category I Seismic (Seismic II/I) and their function is to support roof drains. The absence of conical washers would result in potential overstressing of the pipe only as a result of bushing disengagement. However, since the design maximum seismic and thermal movements of these supports are so small (.057 seismic, 0.00 thermal), we believe bushing disengagement is not a real concern. As a result, we believe the integrity of the sway struts as Seismic II/I supports is not impaired.
- 3) The designer (Bechtel Power Corp.) has evaluated this condition and determined these supports to be acceptable "as-is" based upon the disposition of Nonconformance Report No. 2NN-5825-H.

Very truly yours,


Donald F. Schnell

TPC/msc

cc: J. E. Konklin, NRC Region III
Richard DeYoung, Director I&E
NRC Resident Inspectors, Callaway Plant (2)
Missouri Public Service Commission