



Docket No. 50-346

License No. NPF-3

Serial No. 1129

March 14, 1985

RICHARD P. CROUSE
Vice President
Nuclear
(419) 259-5221

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz
Operating Reactor Branch No. 4
Division of Licensing
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Stolz:

Pursuant to 10 CFR 50.55a (a)(2)(ii) Toledo Edison hereby requests NRC approval to use ASME Code Case N-411, Alternative Damping Values for Seismic Analysis of Piping, an alternative to Table N-1230-1, Appendix N of ASME Section III, Division 1, for the response spectrum seismic analysis of the Class 1 reactor vessel head to hot leg continuous vent line at the Davis-Besse Nuclear Power Station Unit No. 1. This continuous vent line is a new 2½ inch diameter, Class 1 pipe line which was discussed in Toledo Edison's submittal to the NRC dated April 15, 1983 (Serial No. 935).

It is Toledo Edison's intention to utilize Code Case N-411 damping values for the response spectrum seismic analysis of this new line in lieu of the critical damping value of 0.5% currently specified in subsection 3.7.1.3 and Table 3.7-1 of the USAR for both the Operating Basis Earthquake (OBE) and Safe Shutdown Earthquake (SSE). The USAR will be revised to reflect this change in a subsequent Amendment to the USAR. The balance of USAR commitments concerning dynamic analysis of piping remains the same.

The vent line displacements will be checked to ensure that the displacements can be accommodated and that there will be no adverse interaction with adjacent structures, components and equipment.

Toledo Edison has completed a safety evaluation of this proposed use of Code Case N-411 and determined that this use does not constitute an unreviewed safety question per the criteria of 10 CFR 50.59.

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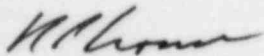
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Toledo Edison requests the NRC issue its approval to use Code Case N-411 for the continuous vent line response spectrum seismic analysis by April 30, 1985 to support the Company's schedule.

Enclosed is a check for \$150 as required by 10CFR170.12(c) for this review and approval.

Very truly yours,



RPC:DRW:lah

cc: DB-1 NRC Resident Inspector