

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUN 05 1985

Docket Nos.: 50-445
and 50-446

Mr. M. D. Spence
President
Texas Utilities Generating Company
400 N. Olive Street
Lock Box 81
Dallas, Texas 75201

Dear Mr. Spence:

Subject: Use of ASME Code Cases N-397 and N-411 for the Comanche Peak
Steam Electric Station (Units 1 and 2)

The NRC staff has received your letter of January 25, 1985, requesting approval to use ASME Code Cases N-397 and N-411 for the analysis of ASME Class 1, 2 and 3 piping in accordance with 10 CFR 50.55(a)(3). Code Case N-397 contains an alternative method to spectral broadening of the seismic accelerations used in the piping analysis. Code Case N-411 contains alternative damping factors that may be used in lieu of values contained in Section III, Division I, Table N-1230-1 of the ASME Code.

Since your request for approval to use ASME Code Cases N-397 and N-411 was received when the design of Comanche Peak Units 1 and 2 is largely completed, provide the reasons and basis for requesting the revision to earlier design commitments. Since there is extensive testimony by your representatives and the staff on the design of ASME Class 1, 2 and 3 piping, and on the use of Section III of the ASME Code for Comanche Peak, the staff requests that you perform a careful review of the hearing record to identify whether (and in what manner) each of the request items may affect the earlier testimony before the ASLB. In addition, the staff requests that you identify whether (and in what manner) the request items may relate to:

- (a) The Motions for Summary Disposition submitted by TUGCO concerning piping and pipe supports;
- (b) Matters which were reviewed by Cygna in the Independent Assessment Program;
- (c) The comments of the NRC's Technical Review Team;
- (d) The comments of the NRC's Special Review Team;
- (e) The comments of the NRC's Construction Appraisal Team.

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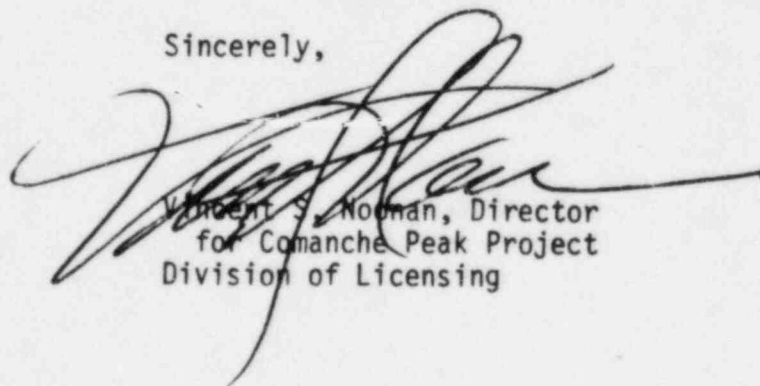
With respect to your request, the NRC staff finds the use of these Code Cases acceptable provided the following items are implemented:

- (a) Piping systems to which the two Code Cases are to be applied are identified in the FSAR;
- (b) For each of the systems identified in (a), describe whether the Code Cases are to be used for new analyses, for reconciliation work, or support optimization;
- (c) The Code Cases should be used only for piping systems analyzed by response spectrum methods and not those using time-history analysis methods;
- (d) Due to an increase in system flexibility, when the Code Cases are used, all predicted maximum displacements shall be checked for adequate clearance with adjacent structures, components, and equipment, and all mounted equipment shall be checked to assure that the increased motion is within the acceptance envelope; and that should the usage of these Code Cases result in removal of supports and restraints, the remaining supported piping system shall be evaluated to assure that piping system stability is guaranteed for all operating modes.
- (e) Piping system design specifications and required design documents shall be revised.
- (f) The requirement in Welding Research Council Bulletin 300 in section entitled "Technical Position on Industry Practice" should be complied with.

Further, we request that you consider whether a Construction Permit amendment is necessary. If not, please provide your rationale.

Should there be further questions concerning this subject, please contact the Project Manager.

Sincerely,



Vincent S. Noonan, Director
for Comanche Peak Project
Division of Licensing

cc: See next page

COMANCHE PEAK

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Mr. M. D. Spence

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cc: See next page

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