

Docket No. 50-346

License No. NPF-3

Serial No. 1163

July 2, 1985



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:

The Toledo Edison Company 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 response spectrum seismic analyses of selected piping at the Davis-Besse Nuclear Power Station Unit No. 1.

It is Toledo Edison's intention to utilize Code Case N-411 damping values for selected new response spectrum seismic analyses, reconciliation work, modifications, and support optimization. These code case values may be used 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 in subsequent amendments to reflect any use of Code Case N-411. When Code Case N-411 damping values are used, piping displacements will be checked to ensure that displacements can be accommodated, that there will be no adverse interaction with adjacent structures, components and equipment, and that any mounted equipment can withstand the increased motion.

When the alternate damping criteria of Code Case N-411 are used, Toledo Edison will not mix Regulatory Guide 1.61 criteria and the alternate criteria of this Code Case in a given analysis.

Toledo Edison requests the NRC issue its approval to use Code Case N-411 on an expeditious basis by July 18, 1985.

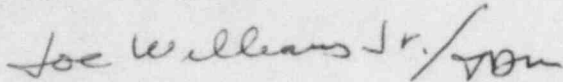
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Docket No. 50-346
License No. NPF-3
Serial No. 1163
July 2, 1985
Page 2

Enclosed is a check for \$150 as required by 10 CFR 170.12(c) for this review and approval.

Very truly yours,

A handwritten signature in cursive script that reads "Joe Williams Jr." followed by a stylized flourish or initial.

Joe Williams, Jr.
Senior Vice President, Nuclear

JW:DRW:lah
cc: DB-1 NRC Resident Inspector