



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

JUL 2 1985

Docket No. 50-354

Mr. R. L. Mittl, General Manager
Nuclear Assurance and Regulation
Public Service Electric & Gas Company
P. O. Box 570, T22A
Newark, New Jersey 07101

Dear Mr. Mittl:

SUBJECT: USE OF ASME CODE CASE N-411 AND ASME SECTION III CODE EDITION AND
ADDENDA FOR HOPE CREEK GENERATING STATION

The staff has completed its review of the May 9, 1985 Public Service Electric and Gas Company (PSE&G) request for authorization to use ASME Code Case N-411 for application as part of the Hope Creek as-built piping stress reconciliation effort for piping systems. Additionally, PSE&G had requested authorization to use selected portions of the 1981 Winter Addenda to Section III of the ASME Boiler and Pressure Vessel Code for piping stress analysis and portions of the 1983 Edition of Section III of the Code for pipe support evaluations at Hope Creek.

Code Case N-411, "Alternative Damping Values for Seismic Analysis of Piping Section III, Division 1, Class 1, 2 and 3 Construction" is a conditionally acceptable Code Case and is approved by the staff for specific plant applications pending revision of Regulatory Guide 1.61. Utilities wishing to use this Code Case shall submit in their request the following information or commitments:

- (a) Commit to use the case for piping systems analyzed by response spectrum methods and not those using time-history analysis methods,
- (b) Indicate if the case is to be used for new analyses or for reconciliation work and for support optimization,
- (c) Due to the increased flexibility of the system, commit to check all system predicted maximum displacements for adequate clearance with adjacent structures, components and equipment, and assure that the mounted equipment can withstand the increased motion,
- (d) When the alternate damping criteria of this Code Case are used, assure they will be used in their entirety in a given analysis and shall not be a mixture of Regulatory Guide 1.61 criteria and the alternate criteria of this Code Case.

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PSE&G has not fully complied with these commitments in your May 9, 1985 request. Upon your commitment to fully comply with the above, the staff will find the PSE&G request to use Code Case N-411 to be acceptable for use at the Hope Creek Generating Station in the seismic analysis of piping systems. Use of Code Case N-411 should be documented in a future Amendment to the FSAR.

With respect to the PSE&G request for approval to use later ASME Code Editions and Addenda than that of the Code of record for Hope Creek, implementation of a later Code Edition and Addenda (or portions thereof) must be in conformance with NCA-1140 of both the later Code Edition and Addenda of Section III, and the Code of record for the facility. It is the responsibility of PSE&G to assure that all related provisions of the Code are adhered to, particularly when selected paragraphs and tables of a later Code Edition and Addenda are used in conjunction with the Code of record. NCA-1140(f) requires plant owners to determine the acceptability of both the Code Edition and Addenda established in the design specification, and in later revisions of the design specification with regulatory authorities such as the NRC.

With respect to your May 9, 1985 request for analysis of piping systems, the NRC staff finds the use of NC-3652, NC-3653, NC-3654, and NC-3655 of Subsection NC of the Winter 1981 Addenda to the 1980 Edition of Section III of the ASME Code and ND-3652, ND-3653, ND-3654, and ND-3655 of Subsection ND of the Summer 1984 Addenda to the 1983 Edition of Section III of the ASME Code acceptable when the following have been performed:

- (a) Identify in the FSAR affected piping (i.e. by system) to which the later Code requirements are to be applied,
- (b) Assure that all related code requirements have been met; include in the FSAR a listing of the related requirements,
- (c) Revise applicable design specifications and required design documents.

Please note that in the May 9, 1985 request, the reference to ND-3652 through ND-3655 in the Winter 1981 Addenda is incorrect. These paragraphs of Subsection ND were not revised until the Summer 1984 Addenda to the Code.

Similarly, with respect to your May 9, 1985 request for pipe support evaluations, the staff finds that Article NF-3000 of Subsection NF of the 1983 Edition of Section III of the ASME Code acceptable only when used in its entirety in place of the selected paragraphs and tables identified in the PSE&G request and when the following have been performed:

- (a) Identify in the FSAR affected piping supports (i.e. by system) to which the later Code requirements are to be applied,

Mr. R. L. Kittl

- 3 -

- (b) Assure that all related code requirements have been met; include in the FSAR a listing of the related requirements,
- (c) Revise applicable design specifications and required design documents.

Please contact us, should you have any questions.

Sincerely,

A handwritten signature in dark ink, reading "Walter R. Butler". The signature is written in a cursive, slightly slanted style.

Walter R. Butler, Chief
Licensing Branch No. 2
Division of Licensing

cc: See next page

Mr. R. L. Mittl

- 3 -

- (b) Assure that all related code requirements have been met; include in the FSAR a listing of the related requirements,
- (c) Revise applicable design specifications and required design documents.

Please contact us, should you have any questions.

Sincerely,

Original signed by:

Walter R. Butler, Chief
Licensing Branch No. 2
Division of Licensing

cc: See next page

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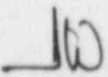
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Mr. P. L. Mittl
Public Service Electric & Gas Co.

Hope Creek Generating Station

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