COMMENTS BY ROBERT J. MASTERSON, ANVIL INTERNATIONAL, INC.
ON DRAFT REGULATORY GUIDE DG-1168
SERVICE LIMITS AND LOADING COMBINATIONS FOR CLASS 1 LINEAR-TYPE COMPONENT SUPPORTS

COMMENT 1:   <u>General Comment.</u>

Throughout the Draft Regulatory Guide, Linear-type supports are referred to as "Component Supports". This is an incorrect designation, since the term "Component Supports" was changed to "Supports" with the issuance of the Winter 1982 Addenda to the 1980 Edition of Subsection NF. In that Addenda Article NF-3000 was revised in its entirety to introduce the concept of "Piping Supports". Previously, the term "Component Supports" encompassed the entire family of supports, i.e. supports on components such as tanks, vessels, pumps, etc. and supports on piping, thus the title of Subsection NF originally (1974) was "Component Supports".

With the Winter 1982 Addenda rewrite, "Component Supports" no longer meant the family of supports, but meant only supports attached to components such as tanks, vessels, pumps, etc. (NF-3500). Also at this time, supports attached to piping were referred to as "Piping Supports" (NF-3600). Over the next few years, the generic term "Component Supports" was changed to "Component and Piping Supports" throughout Subsection NF and the title on the cover of Subsection NF was changed from "Component Supports " to "Supports" (1995 Edition).

If the Draft Regulatory Guide is only supposed to apply to supports attached to components and not to supports attached to piping, then it is correct as written. If the Draft Regulatory Guide is meant to apply to all Linear-type supports, i.e. component and piping supports, then the term "Component Supports" needs to be changed to "Supports" or "Component and Piping Supports".

COMMENT 2:   <u>Specific Comment.</u>

For Regulatory Position C 2 c, page 6, The Nuclear Regulatory Commission needs to identify which equations are required to be rederived to account for varying values of E, Young's Modulus, based upon the material specification. There are numerous equations in NF-3320 that contain empirical constants that may or may not be based on E. How is the user supposed to determine which equations are in question and which ones require new derivations for E?