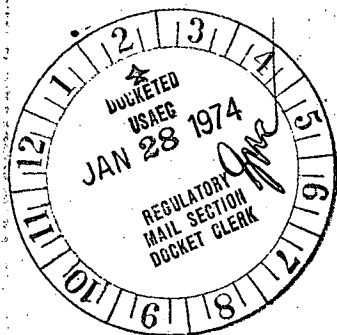
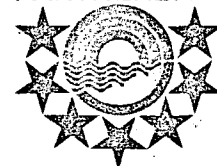


TENNESSEE VALLEY AUTHORITY  
CHATTANOOGA, TENNESSEE  
37401



January 25, 1974

50-327/328  
50-390/391



Mr. A. Giambusso  
Deputy Director for Reactor Projects  
Directorate of Licensing  
Office of Regulation  
United States Atomic Energy Commission  
Washington, DC 20545

Dear Mr. Giambusso:

Personnel from the Tennessee Valley Authority met with members of your staff in Bethesda, Maryland, on October 19, 1973. At that meeting, TVA received for comment an informal copy of the AEC Document B - Structural Design Criteria for Evaluating the Effects of High-Energy Pipe Breaks on Category I Structures Outside the Containment. We have the following comments:

1. Load combinations D.1(a)(2) and (3) use the same required steel strength. We do not think it is reasonable to use the same steel allowable stress for both Feqo and Feqs.
2. The combination of loading effects which must be considered seems unreasonable. We do not feel that the maximum values of  $P_a$ ,  $T_a$ ,  $R_a$ ,  $Y_j$ ,  $Y_r$ , and  $Y_m$ , including appropriate dynamic factors, should be used in the load combinations since the maximum values do not occur simultaneously. We do not agree that a time-history analysis is always necessary in order to use less than peak values.
3. We are not in complete agreement with the AEC position concerning load combinations that include earthquake and pipe rupture loads simultaneously. We feel that probability factors should be considered in determining the applicable loads that occur simultaneously.

Very truly yours,

J. E. Gilleland  
Assistant to the Manager of Power

