TENNESSEE VALLEY AUTHORITY WATTS BAR NUCLEAR PLANT

PIPE SUPPORT MINIMUM DESIGN LOAD EVALUATION FINAL REPORT REVISION 1

PREPARED BY: Stansh DATE: 9/25/91

REVIEWED BY: W. L. Smather DATE: 9/26/91

APPROVED BY: Luke Office DATE: 9/26/91

EXECUTIVE SUMMARY

PROBLEM DESCRIPTION - Specific requirements were incorporated in the Watts Bar pipe support design criteria (WB-DC-40-31.9, Revision 7) to close an employee concern regarding pipe support stiffness and deflection requirements (specifically Sections 2.3.6 and 3.7.1). Revision 9 to the criteria revised portions of the document which had been added for the employee concern closure. TVA did not coordinate this change with the Employee Concern Program (ECP) Manager. Further, the completed pipe support evaluations for the piping in the large bore 79-14 reanalysis effort used Revision 9 and later revisions of this criteria for design and qualification of new and modified support structures.

RESOLUTION - To resolve this issue with the ECP, TVA has completed a three-phased program to demonstrate that the changes made by Revision 9 (and later) neither impact the closure of the employee concern nor compromise the adequacy of the pipe supports at the Watts Bar Nuclear Plant.

-Phase I: Screening of design load vs. minimum design load (MDL)

-Phase II: Engineering evaluation of supports having a design load less than the MDL; check deflection using MDL

-Phase III: Refined analysis for supports falling out of Phase II; issuance of any modifications

For the Hanger and Analysis Update Program (HAAUP) 8660 pipe supports, as listed in the Hanger Tracking Program (HTP), were qualified using Revision 9 or later of WB-DC-40-31.9. The total number of support evaluations per phase is as follows:

Phase I 8660 supports

Phase II 4939

Phase III ...

CONCLUSIONS - The results of the MDL program have demonstrated:

Compliance with the minimum design load provisions of a) WB-DC-40-31.9, Revision 7, has been demonstrated for 99.87% of the HAAUP pipe supports. The eleven supports listed below will be modified to meet minimum design load provisions:

R1

47A42708001	47A45002092	47A45002097
47A42708002	47A45002093	47A45002099
47A43503006	47A45002094	47A45008008
701CCR493	47A45002096	

Later revisions to the design criteria provide comparable b) structural designs to those designed using Revision 7, and, therefore, do not invalidate the closure of the employee concern.

CONCLUSIONS - (continued)

c) Based on the evaluation of 1219 supports for pipe sizes from 1.25" to 2" which demonstrated their acceptability for MDL coupled with the fact that supports for piping 1" and smaller are excluded from the MDL requirements, it is concluded that the Small Bore Program work scope is acceptable.

<u>RECURRENCE CONTROL</u> - Revisions to sections 2.3.6, 3.4.4, 3.5.1, and 3.7.1 of WB-DC-40-31.9 have been identified to clarify MDL and to include "source noting" of the ECP concern to prevent recurrence.

EXTENT OF CONDITION - A review of the design criteria revisions from 1988 to the present did not reveal any other changes that could possibly invalidate corrective actions.

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1.0 BACKGROUND

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During the November, 1990 NRC audit of Amendment 64 of the Watts Bar FSAR, the minimum design load requirements for pipe supports were subject to review. Revision 7 of WB-DC-40-31.9, "Criteria for Design of Piping Supports and Supplemental Steel in Category I Structures" specified, in response to an employee concern (Reference 13), a minimum design load (MDL) for pipe supports.

Section 2.3.6 of Revision 7 defined MDL as, "The larger of 150 pounds or the weight of a standard water-filled ANSI B31.1 span". In Revision 9 of the same document, this requirement was altered such that the MDL equaled 150 pounds and was applied only to new supports in the minus vertical direction. This section has remained essentially the same through Revision 12.

The Revision 9 changes concerning MDL were not coordinated with the Employee Concern Program (ECP) prior to implementation. The Hanger and Analysis Update Program qualified the supports to Revision 9 or later of the design criteria. The investigation documented in this report was undertaken to determine what effect the changes in the design criteria, relative to minimum design load, had on the concern brought to the ECP.

2.0 PURPOSE

The purpose of this task is to demonstrate compliance with the minimum design load requirements of Revision 7 for the population of pipe supports completed under the Hanger and Analysis Update Program (HAAUP).

3.0 SCOPE

The scope for the three-phase evaluation encompasses the HAAUP supports contained within the 319 rigorously analyzed large bore piping problems as listed in the Hanger Tracking Program (HTP). The Phase I scope is 8660 supports.

4.0 REFERENCES / DATA SOURCES

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- 1. "Pipe Support Minimum Design Load Evaluation Phase I and Phase II Report," April, 1991, RIMS L44910418802
- 2. TVA memorandum from R.O.Hernandez to R.V.Pierce, Feb.27,1991, "Minimum Loads for Pipe Supports," RIMS B26910227100
- 3. WB-DC-40-31.9, Rev.7, "Criteria for Design of Piping Supports Supplemental Steel in Category I Structures," RIMS B41880113001
- 4. WB-DC-40-31.9, Rev.9, "Criteria for Design of Piping Supports Supplemental Steel in Category I Structures," RIMS B26881229006
- 5. WB-DC-40-31.9, Rev.12, "Criteria for Design of Piping Supports Supplemental Steel in Category I Structures," RIMS B26910412113
- 6. Base Design Change Notices (DCN) for the 319 rigorously analyzed large bore piping problems
- 7. As-built packages for the 319 piping problems
- 8. Piping analysis computer run of record for the 319 problems
- 9. Pipe support calculations of record for the HAAUP rigorously analyzed pipe supports
- 10. Hanger Tracking Program (HTP), date 12-6-90
- 11. Design Input Memorandum to WB-DC-40-31.9, DIM-WB-DC-40-31.9-12, RIMS B26900206079
- 12. -This reference number is not used-

|R1

- 13. Employee Concern Report ECP-86-KX-165-01, RIMS L12880329976
- 14. "Pipe Support Minimum Design Load Review and Evaluation Documentation," calculation no. TEACEBEMG30, Rev.1 (Rev.0 RIMS B18910830801)

R1

Note: For Revision 0 of the Final Report see RIMS B26910725100

5.0 METHODOLOGY

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5.1 PHASE I and PHASE II

Phase I and Phase II Methodology is presented in the Phase I and Phase II Report (Reference 1). The Methodology and the Special Cases (also in Reference 1) detail the process by which supports were evaluated for MDL during Phase I and II. The Special Cases include: tieback supports, variable & constant supports, unidirectional (vertical) supports, supports adjacent to strain sensitive equipment, and gang supports.

5.2 PHASE III

The supports that did not pass Phase I and Phase II evaluations were evaluated in Phase III. This phase involves categorizing the Phase II attributes, assessing each attribute type, qualifying supports by refined analysis, and modifying supports if necessary. (Refer to Attachment A for a listing of the Phase III supports, their Phase II attributes, and their dispositions.)

The Phase III process followed the steps identified below:

- List the Phase II attributes for all Phase III supports (refer to Attachment A). Identify any attribute type or other recurring design aspect which may be acceptable due to specific task and/or design features.
- 2. Investigate and assess which attributes are acceptable for MDL with no further actions. (Section 6.0 details the attributes assessed during this step.)
- 3. All remaining Phase III supports not acceptable under step 2 will be dispositioned by revising the original calculations of record.
- 4. Analyze the support for the Phase II attribute using refined approaches to determine acceptability. Review other support features with respect to MDL.
- 5. For supports that are acceptable revise the calculation of record to document the MDL evaluation.
- 6. For supports which cannot be qualified, a senior level review team consisting of both TVA and ESI engineers will determine if any modifications are required.
- 7. All documents revised or initiated to disposition the Phase III supports will be identified in the main documentation package (Reference 14).

6.0 ATTRIBUTE ASSESSMENT

The Phase III supports were reviewed with respect to Phase II attributes and other design aspects to determine common MDL concerns. Four attributes were evaluated for possible acceptibility under MDL. (For a listing of all the Phase III supports and their dispositions refer to the Phase III Summary provided in Attachment A and, also, to Attachment 4.0 of Reference 14.) The attributes are presented below:

R1

|R1

6.1 PIPING 1" AND SMALLER

In order to ensure that all HAAUP piping larger than 1" was included, all supports on HAAUP piping were included in the initial screening. Supports for 1" and smaller piping do not require evaluation for MDL per Rev.7 of WB-DC-40-31.9.

6.2 DEFLECTIONS LESS THAN OR EQUAL TO 1/8"

Phases I and II evaluated MDL based on a deflection allowable of 1/16". The 1/16" allowable is for seismic/dynamic load and for supports adjacent to strain sensitive equipment. All supports adjacent to strain sensitive equipment have been identified and reviewed for MDL using 1/16" allowable.

There are 15 Phase III supports with initial MDL deflections greater than 1/16" but less than 1/8". A technical assessment was performed using refined support analyses coupled with review of adjacent supports and piping configurations. The summary of results is presented in Attachment B. The analyses are documented in the individual support calculation of record. All calculations and any associated modification documents are listed in Revision 1 of the main documentation calculation (Reference 14).

R1

6.3 +Y RESTRAINTS FOR 36" ERCW PIPING ON PROBLEM N3-67-09A

The MDL for 36" piping is 21,500 pounds. Six pipe supports for 36" pipe on problem N3-67-09A have -Y components that meet MDL, however, the +Y loads are less than the MDL. The actual +Y design loads, as determined from rigorous (computer) piping analysis, range from 2,000 to 10,000 pounds. For this specific case the deadweight (-Y) of the 36" pipe governs the actual load of the +Y restraint. The +Y components will be modified R1 to meet MDL provisions. All calculations and associated modification documents are listed in Revision 1 of the main documentation calculation (Reference 14).

6.4 Y-DIRECTIONAL RESTRAINT WITHOUT +Y COMPONENT

Two supports are designed as uni-directional (-Y only) but show +Y loads on design load sheets. The acceptance of the as-built configurations or modification to add +Y components will be dispositioned under Problem Evaluation Report (PER) number WBPER910262 which is external to the MDL evaluation task. The current configurations (-Y components) are acceptable for MDL, and the +Y components, if required, will be designed to meet MDL.

7.0 RESULTS

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For the MDL evaluation the results are:

<u>Phase I</u> - 8660 pipe support design loads were screened against the appropriate MDL and 3721 are acceptable with no further evaluation. 4939 supports were evaluated in Phase II.

<u>Phase II</u> - Engineering evaluations were performed for 4939 pipe supports for the appropriate MDL. 4883 were shown to be acceptable with no further evaluation required. 56 pipe supports were evaluated in Phase III.

Phase III - Attribute assessments and refined analyses were
performed for 56 supports. 45 were shown to be acceptable for
the MDL. 11 supports will be modified to meet the MDL
requirements of Revision 7 of WB-DC-40-31.9.

<u>Documentation of Results</u> - The evaluation documentation is provided in Reference 14. The refined analyses were performed and are documented in the support calculations of record which |R1 are also identified in Reference 14. Refer to Attachment A for a summary of the Phase III supports.

8.0 CONCLUSIONS

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This review has demonstrated that of the 8660 pipe supports evaluated in HAAUP scope 0.13% were found to deviate from the minimum design load requirements of WB-DC-40-31.9, Revision 7.

TVA concludes that the pipe supports are adequately designed, and have demonstrated that 99.87% of the HAAUP supports meet the minimum design load of Revision 7. The following 11 supports will be modified to meet the minimum design load (B31.1 span load for large bore piping) requirement:

R1

R1

47A42708001 1. 47A42708002 2. 3. 47A43503006 4. 701CCR493 5. 47A45002092 6. 47A45002093 7. 47A45002094 8. 47A45002096 9. 47A45002097 10. 47A45002099 47A45008008 11.

Based on the evaluation of 1219 supports for pipe sizes from 1.25" to 2" which demonstrated their acceptability for MDL coupled with the fact that supports for piping 1" and smaller are excluded from the MDL requirements, it is concluded that the Small Bore Program work scope is acceptable.

Revisions to sections 2.3.6, 3.4.4, 3.5.1, and 3.7.1 of WB-DC-40-31.9 have been identified to clarify MDL and to include "source noting" of the ECP concern to prevent recurrence.

A review of the design criteria revisions from 1988 to the present did not reveal any other changes that could possibly invalidate corrective actions.

WBNP UNIT 1 PHASE III SUMMARY

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NO.	SUPPORT NUMBER	PROBLEM NUMBER	PIPE	PHASE II ATTRIBUTE	PHASE III RESOLUTION	MDL PHASE III DOCUMENTATION	
1	170844	2000410	1"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1	
2	170881	2000411	1"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1	
3	170918	2000411	1"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1	
4	162A186	2000807	0.75"	DEFLECTN.	MDL DEFL. < 1/16"- OK *	SECTION 6.2	
5	162A806	2000812	1"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1	
6	47A43506079	2000901	1"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1	
7	47A42702034	N3-03-01A	8"	DEFLECTN.	REFINED ANALYSIS - OK	47A42702034,R2	
8	47A42708001	из-03-05а	8"	DEFL/PL.STR	MODIFY FOR MDL - OK	47A42708001,R3	
9	47A42708023	N3-03-05A	2"	DEFLECTN.	DEFL. ACCEPTABLE - OK	SECTION 6.2	R1
10	47A42708024	N3-03-05A	2"	DEFLECTN.	DEFL. ACCEPTABLE - OK	SECTION 6.2	
11	47A42708026	N3-03-05A	0.5"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1	
12	47A42708029	N3-03-05A	6"	DEFLECTN.	DEFL. ACCEPTABLE - OK	ATTACHMENT B	R1
13	47A42708002	N3-03-05A	10"	PL.STRESS	MODIFY FOR MDL - OK	47A42708002,R2	
14	47A49108010	N3-26-03A	1.5"	DEFLECTN.	DEFL. ACCEPTABLE - OK	SECTION 6.2	R1
15	47A91503034	N3-30-03R	8"	DEFLECTN.	DEFL. ACCEPTABLE - OK	SECTION 6.2	
16	47A93007049A	N3-31-09A	6"	PL.STRESS	REFINED ANALYSIS - OK	47A93007049A,R2	

^{*} NOTE: ADJACENT TO STRAIN SENSITIVE EQUIPMENT

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ATTACHMENT A

WBNP UNIT 1 PHASE III SUMMARY

NO.	SUPPORT NUMBER	PROBLEM NUMBER	PIPE SIZE	PHASE II ATTRIBUTE	PHASE III RESOLUTION	MDL PHASE III DOCUMENTATION
17	47A92044003	N3-31-11A	12"	PL.STRESS	REFINED ANALYSIS - OK	47A92044003,R4
18	47A92044006	N3-31-11A	12"	DEFLECTN.	DEFL. ACCEPTABLE - OK	SECTION 6.2
19	47A46211084	N3-61-08R	12"	PL.STRESS	REFINED ANALYSIS - OK	47A46211084,R1
20	47A46211109	N3-61-08R	12"	DEFLECTN.	DEFL. ACCEPTABLE - OK	SECTION 6.2
21	47A40602012	N3-62-27A	0.75"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1
22	47A55518001	N3-62-40A	3"	EVAL. +Y	PER # WBPER910262 - OK	SECTION 6.4
23	631SISR089	N3-63-03A	4"	EVAL. +Y	PER # WBPER910262 - OK	SECTION 6.4
24	47A43503006	N3-63-07A	24"	PL.STRESS	MODIFY FOR MDL - OK	47A43503006,R3
25	671ERCWR436	N3-67-09A	36"	DEFLECTN.	REFINED ANALYSIS - OK	671ERCWR436,R5
26	47A45002092	N3-67-09A	36"	DEFLECTN.	MODIFY FOR MDL - OK	SECTION 6.3
27	47A45002093	N3-67-09A	36"	DEFLECTN.	MODIFY FOR MDL - OK	SECTION 6.3
28	47A45002094	N3-67-09A	36"	DEFLECTN.	MODIFY FOR MDL - OK	SECTION 6.3
29	47A45002096	N3-67-09A	36"	DEFLECTN.	MODIFY FOR MDL - OK	SECTION 6.3
30	47A45002097	N3-67-09A	36"	DEFLECTN.	MODIFY FOR MDL - OK	SECTION 6.3
31	47A45002099	N3-67-09A	36"	DEFLECTN.	MODIFY FOR MDL - OK	SECTION 6.3
32	47A45008008	N3-67-16A	6"	DEFLECTN.	MODIFY FOR MDL - OK	SECTION 6.2

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ATTACHMENT A

WBNP UNIT 1 PHASE III SUMMARY

NO.	SUPPORT NUMBER	PROBLEM NUMBER	PIPE SIZE	PHASE II ATTRIBUTE	PHASE III RESOLUTION	MDL PHASE III DOCUMENTATION	
33	47A45020004	N3-67-24A	1"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1	
34	47A45004032	N3-67-53A	6"	DEFLECTN.	DEFL. ACCEPTABLE - OK	SECTION 6.2	R1
35	701CCR324	N3-70-04A	12"	DEFLECTN.	DEFL. ACCEPTABLE - OK	SECTION 6.2	
36	170089	N3-70-05R	1"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1	
37	701CCR493	N3-70-08A	16"	MEM.STRESS	MODIFY FOR MDL - OK	701CCR493,R3	
38	47A46406048	N3-70-30A	1"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1	
39	47A56018046	N3-77-01R	2"	DEFLECTN.	DEFL. ACCEPTABLE - OK	SECTION 6.2	R1
40	47A45403002	N3-78-13A	10"	DEFLECTN.	REFINED ANALYSIS - OK	47A45403002,R2	
41	17A58601069	N3-82-07D	10"	PL.STRESS	REFINED ANALYSIS - OK	17A58601069,R5	
42	17A58601075	N3-82-08D	10"	DEFLECTN.	REFINED ANALYSIS - OK	17A58601075,R2	

NOTE: NUMBERS 43 THRU 56 ARE GANG SUPPORTS CONTINUED ON THE NEXT 2 PAGES

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PIPE SUPPORT MINIMUM DESIGN LOAD EVALUATION - FINAL REPORT

ATTACHMENT A

WBNP UNIT 1 PHASE III SUMMARY

NO.	PRIMARY GANG SUPPORT NO.	SECONDARY SUPPORT NO.	PIPE SIZE	PHASE II ATTRIBUTE	PHASE III RESOLUTION	MDL PHASE III DOCUMENTATION
43	162A434		0.75"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1
		162A433	1"			
		170884	1"			
44	170822		1"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1
		170088	1"			
45	47A06063079		0.75"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1
		47A43508024	0.75"			
		47A43508027	0.75"			
		47A43508076	0.75"			
46	47A43506008		0.75"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1
	ı	47A43506087	0.75"			
47	47A45003058		6"	DEFLECTN.	REFINED ANALYSIS - OK	47A45003058,R5
		47A45003505	6"			
		47A45003295	6"			
48	47A45003152		4"	DEFLECTN.	DEFL. ACCEPTABLE - OK	SECTION 6.2
		47A45003213	4"			

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PIPE SUPPORT MINIMUM DESIGN LOAD EVALUATION - FINAL REPORT

ATTACHMENT A

WBNP UNIT 1 PHASE III SUMMARY

NO.	PRIMARY GANG SUPPORT NO.	SECONDARY SUPPORT NO.	PIPE SIZE	PHASE II ATTRIBUTE	PHASE III RESOLUTION	MDL PHASE III DOCUMENTATION	
49	47A45003275		2"	DEFLECTN.	DEFL. ACCEPTABLE - OK	SECTION 6.2	R
		47A45003261	2"				
50	47A45014010		1.5"	DEFLECTN.	REFINED ANALYSIS - OK	47A45014010,R2	
		47A45014003	1.5"				
51	51 47A45021219		3"	DEFLECTN.	DEFL. ACCEPTABLE - OK	SECTION 6.2	 R
		47A45021408	3"				
52	52 47A45021003		4"	DEFLECTN.	PER PHASE II: 4" PIPE	SECTION 6.1	
		47A45021464	1"	(1" PIPE)	SUPPORT - OK FOR MDL; 2ND PIPE <or= -="" 1"="" ok<="" td=""><td></td><td></td></or=>		
53	47A46404119		3"	DEFLECTN.	DEFL. ACCEPTABLE - OK	SECTION 6.2	R
		47A46404118	3"				
54	47A55510036		2"	DEFLECTN.	REFINED ANALYSIS - OK	47A55510036,R5	
		47A55510077	2"				
55	621CVCR240		1"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1	
		621CVCR239	1"				
56	56 741RHRR078		0.75"	DEFLECTN.	PIPE < or = 1" - OK	SECTION 6.1	
		741RHRR068	0.75"				

PHASE III: TECHNICAL ASSESSMENT OF SUPPORTS WITH INITIAL MDL DEFLECTIONS GREATER THAN 1/16" AND LESS THAN 1/8"

SUPPORT NUMBER	PIPE SIZE	CALCULATION DESIGN DEN TOTAL LOAD	N OF RECORD FLECTIONS DYNAMIC LD.	REFINED MDL DEFLECTION	MDL MEETS 1/16"	MEETS REV.7 1/10"	RESULTS OF EVALUATING ADJACENT SUPPORTS AND/OR INTERPRETATION OF RESULTS	RESULTS OF MDL
47A42708023	2"	0.047"	NOT REQUIRED	0.052"	YES	YES	NOT REQUIRED	ок
47A42708024	2"	0.094"	0.049"	0.073"	NO	YES	ADJACENT SUPPORTS SAME CONFIGURATION AS THIS SUPPORT - TUBE STEEL CANTILEVER OFF FLOOR	OK
47A42708029	6"	0.051"	NOT REQUIRED	0.065"	YES	YES	SEE NOTE	ок
47A49108010	1.5"	0.027"	NOT REQUIRED	0.039"	YES	YES	NOT REQUIRED	OK
47A91503034	8"	0.105"	0.015"	0.079"	NO	YES	ONE ADJACENT SUPPORT IS SIMILAR DOUBLE CANTILEVER OTHER ADJACENT SUPPORT IS SHORTER CANTILEVER	ок
47A92044006	12"	0.011"	NOT REQUIRED	0.067"	YES	YES	SEE NOTE	OK
47A46211109	12"	0.076"	0.003"	0.067"	YES	YES	SEE NOTE	ок
47A45008008	6"	0.040"	NOT REQUIRED	0.112"	NO	NO	VERY CLOSE TO FLEX-HOSE CONNECTION	MOD

NOTE: MDL DEFLECTION HAS NEGLIGIBLE EXCEEDANCE

PHASE III: TECHNICAL ASSESSMENT OF SUPPORTS WITH INITIAL MDL DEFLECTIONS GREATER THAN 1/16" AND LESS THAN 1/8"

SUPPORT NUMBER	PIPE SIZE	CALCULATION DESIGN DEI TOTAL LOAD	OF RECORD FLECTIONS DYNAMIC LD.	REFINED MDL DEFLECTION	MDL MEETS 1/16"	MEETS REV.7 1/10"	RESULTS OF EVALUATING ADJACENT SUPPORTS AND/OR INTERPRETATION OF RESULTS	RESULTS OF MDL
47A45004032	6"	0.041"	NOT REQUIRED	0.065"	YES	YES	SEE NOTE	ок
701CCR324	12"	0.060"	NOT REQUIRED	0.062"	YES	YES	NOT REQUIRED	ок
47A56018046	2"	0.089"	0.043"	NOT APPLICABLE	N/A	N/A	SUPPORT IS ON CLASS G DRAIN PIPING THAT WAS MODELLED WITH THE LARGE BORE PIPING INSTEAD OF USING AN ANALYSIS ANCHOR. THE SUPPORT RESPONSE DOES NOT AFFECT THE ASME CLASS PIPING.	OK
47A45003152 GANG	4"	0.089"	0.034"	0.040"	YES	YES	NOT REQUIRED	ок
47A45003275 GANG	2"	0.056"	NOT REQUIRED	0.068"	YES	YES	SEE NOTE	ок
47A45021219 GANG	3"	0.055"	NOT REQUIRED	0.015"	YES	YES	NOT REQUIRED	ОК
47A46404119 GANG	3"	0.061"	NOT REQUIRED	0.049"	YES	YES	NOT REQUIRED	ОК

NOTE: MDL DEFLECTION HAS NEGLIGIBLE EXCEEDANCE