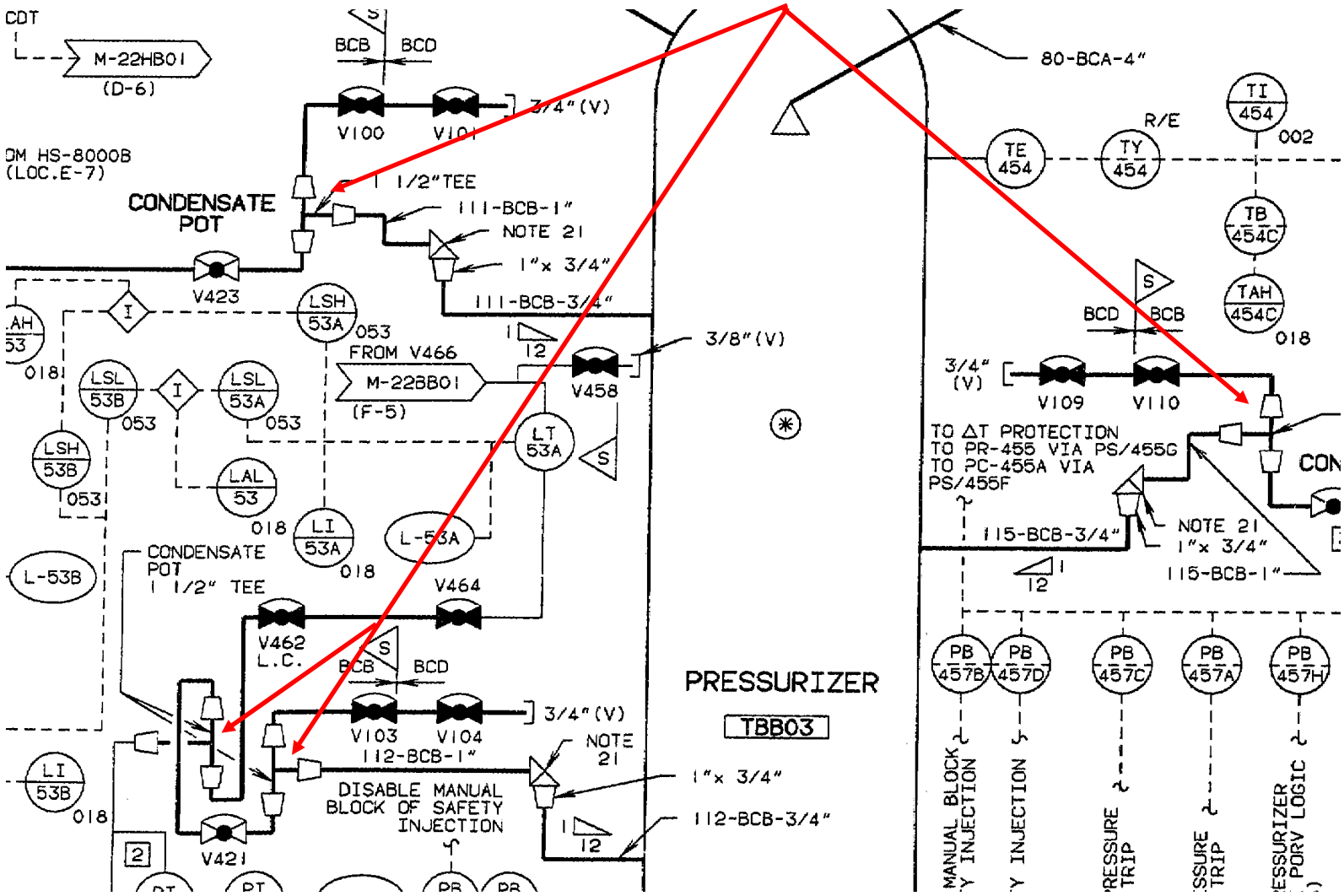
NRC Comment: [The licensee's initial] response is not adequate. It isn't clear what is the significance of considering the 1-1/2 x 3/4 reducer a fitting, as far as ASME Class 1 fatigue analysis is concerned. If the 1-1/2 end of the reducer is attached to ASME Class 1 piping, this end is not exempted from a Class 1 fatigue analysis, even though the 3/4 end is exempted. They have not provided adequate justification for not doing the Class 1 fatigue analysis of the 1-1/2 end.

Response: Callaway's original plant design included 1 1/2" tee fittings (Condensate Pots) connected to ASME Class 2 (BCB) lines. (See figure below.) No ASME Class 1 fatigue curves were required during the original design of the plant due to the ASME Class 2 classification of the adjacent lines.