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SUBJECT: Confirms util understanding that use of 1% damping in
 reverification of seismic design of piping sys acceptable to
 NRC, per 870305 & 09 discussions w/G Bagchi.

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10 CFR 50.59

U. S. Nuclear Regulatory Commission
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Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Use of Increased Damping Factors in Pipe System Analysis

In accordance with commitments recently made to the NRC, WPSC is beginning a program to reverify the seismic design of piping systems at the Kewaunee Nuclear Power Plant in accordance with IE Bulletin 79-14. In order to lessen the impact of this work, WPSC has sought to reduce some of the conservative assumptions that were made in the original stress analyses. Accordingly, we have performed an evaluation as required by 10 CFR 50.59 and have concluded that the use of 1% damping for piping systems (increased from 0.5%) does not create an unreviewed safety question. Table B.6-5, in Appendix B of our USAR, shows the damping values used for various applications.

Our evaluation was based on a review of Regulatory guides 1.60, 1.61 and 1.84, and a qualitative comparison of our floor response spectrum at 1% damping to currently accepted spectra.

WPSC discussed this with our NRC project manager and Mr. Goutam Bagchi of the mechanical engineering branch on March 5, 1987 and again with our Project Manager on March 9, 1987. It is our understanding that our intended use of 1% damping, that is to be applied only to the reverification work mentioned above and future plant modifications, as necessary, is acceptable to the NRC.

Sincerely,

Charles A. Hintz for

D. C. Hintz
Vice President - Nuclear Power

DR/jms

cc - Mr. Robert Nelson, US NRC
US NRC, Region III

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