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77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211 • TWX 910-372-6587

JAMES D. SHIFFER VICE PRESIDENT NUCLEAR POWER GENERATION

February 1, 1985

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PGandE Letter No.: DCL-85-041

Mr. George W. Knighton, Chief Licensing Branch No. 3 Division of Licensing Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80 Docket No. 50-323 Diablo Canyon Units 1 and 2 NRC Allegations 1430, 1431, and 1432

Dear Mr. Knighton:

During the NRC Staff piping audit on Diablo Canyon Unit 2 conducted on January 14-17, 1985, the Staff requested a written response to NRC Allegations 1430, 1431, and 1432 raised by C. Stokes related to pipe supports. Enclosed are PGandE's responses to these allegations. The response to Allegation 1432 was previously provided to Mr. H. Polk, NRR, on January 17, 1985.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely, D. Shiffer

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Enclosure

cc: R. T. Dodds J. B. Martin H. E. Schierling Service List

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#### ENCLOSURE

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NRC Allegation #1430

It is alleged that:

The first of my concerns involves the placement of rigid supports near elbows. Two cases come to mind --

(1) A branch line being subjected to axial buckling, or tensile stress.



From the NRC and PGandE documents, it is impossible to tell if NRC or PGandE looked at this potential problem.



I am concerned about the 15,000 feet of pipe qualified soley (sic) by span rule. (Reference page 5 of IDVP re-evaluation in proposed SSER). This appears to have been overlooked.

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#### Response:

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This allegation raises the following questions:

- i) For a branch line, was the placement of the first support from the header piping done correctly?
- ii) Did the 15000 feet of small bore piping qualified by the span method correctly consider the issue in (i) above?

In Unit 1, the location and type of the first support on a branch line in each direction from the header pipe is based on the following:

- a) The branch piping between this support and the connection to the header pipe has sufficient flexibility to accommodate seismic and thermal displacements of the header pipe.
- b) The branch piping has stresses less than the code allowable stress when subjected to the header displacements.
- c) The support load is of reasonable value (about 300 lbs or less for small bore piping).

The small bore piping sample program was specifically designed to include the design considerations of piping and equipment seismic anchor movement (SAM) and thermal anchor movement (TAM). The sample program analysis results provided the basis for accepting the 15,000 feet of small bore piping and supports for the SAM design consideration. However, the sample program results caused verification of all small bore piping subjected to large SAM from equipment. Further, all stainless steel piping above 165<sup>O</sup>F and carbon steel piping above 200<sup>O</sup>F was computer analyzed (using ME101), thereby eliminating the possibility of any TAM-related problems. These analyses would preclude either the location or the type of support as the cause for piping overstress.

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Sections 3.3.3, 5.2, and 5.3 of the IDVP Interim Technical Report 61 thoroughly investigated the above aspects of the span method.

For Unit 2, all Class 1 piping was analyzed by computer addressing SAM and TAM, as applicable.

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NRC Allegation #1431

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It is alleged that:

The second concern is placement through the construction tolerance of six inches for the location of a pipe support on piping. This factor must be considered in combination with a special support configuration. But the pipe stress group had separated the two supports when we received them at the pipe support group. As a result, they improperly were considered in isolation. I am aware of this happening at least once because I corrected it:



This pair of supports are usually shown on the stress isometric drawings as being at the same location. It is a special case where the pipe must be seismically restrained but allowed to move for thermal reasons. It is possible by using the six-inch construction tolerance to place the snubber (see above) on the opposite side of the rigid restraint. As a result, when the pipe moves, the snubber clamp binds on the rigid restraint, either causing the restraint to fail or the pipe to overstress. This is also applicable to a spring-can and as rigid restraint in the lateral direction.

#### Response:

This allegation describes a possibility of interference between a pipe support and external structural steel or between two adjacent pipe supports due to the Construction Group's use of the six-inch pipe support installation tolerance.

During the pipe support design phase, it is not always possible to identify all interferences. Hence, walkdowns were performed to provide added assurance that the systems are installed such that they will perform their intended design function.

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Mr. Stokes appears to be concerned that pipe supports separated by six inches or less were only considered in isolation. This is not so. All adjacent pipe support hardware which was known at the time of design was considered. Only supplementary steel which was subsequently installed could not be considered. Mr. Stokes also appears to be concerned that in certain circumstances use of a 6-inch tolerance criterion could result in pipe overstress. In either case, the potential interference or the condition of overstress would be identified during the walkdown program, thereby, eliminating any potential overstress condition.

All conditions of improper location of supports or overstress were identified and corrected according to appropriate procedures as part of the various piping walkdown programs that were performed at the Diablo Canyon site. (References: Project Procedure P-36, "Walkdown of Piping During Hot Functional," and Project Instructions I-50, "Stress Walkdown for Design Class I Systems.")

Attached are examples from these walkdowns identifying and correcting such interferences.

## ATTACHMENT I

6

Heatup Walkdown Problem Report #15-1

<u>Problem Description</u>: Pipe clamp of support #15-115SL interferes with steel of support #575-188R due to thermal growth of the pipe.

Resolution: Both supports redesigned to resolve this problem.

#### ATTACHMENT II

Stress Walkdown Problem Resolution #220

<u>Problem Description</u>: Pipe support #74-2V interferes with 1-inch diameter heat-traced pipe due to thermal growth of the line.

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<u>Resolution</u>: Pipe clamp offset to avoid interference with the heat-traced pipe. Insulation on pipe at north notched to avoid interference due to offset of clamp.

#### ATTACHMENT III

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Stress Walkdown Problem Report #1034

<u>Problem Description</u>: Interference between coupling and steel of pipe support due to thermal growth of the line.

<u>Resolution</u>: Support steel to be notched to avoid the interference.

#### ATTACHMENT IV

This is an excerpt from the referenced Hot Piping Walkdown Report addressing the thermal growth concern.

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#### NRC Allegation #1432

#### It is alleged that:

Issues which the ACRS discussed on Friday, July 13, 1984, involve the radial expansion of large bore lines. There is a construction tolerance of 1/16-inch on a side with a 1/6-inch tolerance, for a total gap of 3/16-inch maximum. Many of the large bore lines, such as Main Steam, Residual Heat Removal (RHR), and Reactor Coolant System (RCS), which are subjected to high pressure and temperature, will expand more than the 3/16-inch maximum (zero-inch possible) and bind up in the support, rather than slide through as intended.



The approximate radial expansion of this line can be one inch. This line will grow in length and diameter roughly at the same uniform rate. It will therefore lock up at approximately only one inch of the axial growth. It still has three inches more to go. I estimated four inches movement as a conservative assumption in Figure 4, because at the meeting on Friday Mr. Shipley admitted movements of six inches in some lines. Two possibilities are likely. --(1) the pipe stronger than the support - support fails, (2) support stronger than pipe -- pipe fails.

#### Response:

This allegation raises the concern that the radial expansion of high temperature piping, such as main steam piping, may be greater than the gap (3/16-inch) around the pipe at frame-type supports. This would result in the pipe binding in the support and causing overstress of the pipe or support.

The 3/16-inch clearance provided for supports in the restrained direction is adequate to accommodate radial thermal growth of the main steam and residual heat removal piping without closing the gaps, assuming maximum line temperature.

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The hot functional and power ascension testing programs have verified that the actual gaps provided in the field are adequate to permit radial expansion of the pipe and permit axial movement of the pipe without binding. The final report on the results of the hot piping walkdown was submitted to the NRC on December 20, 1984 (PGandE letter No. DCL-84-382). Attachment IV is excerpted from the referenced Hot Piping Walkdown Report addressing the thermal growth concern. The NRC also participated in the physical inspections (walkdowns) during the Unit 2 Hot Functional Test Program.

For Unit 1, as noted in SSER-25 (page 2-2), the NRC concluded that in satisfaction of Item 5 of License Condition 2.C.(11) the actual thermal movements are in reasonable agreement with calculated movements.

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# ATTACHMENT I

Procedure P-36 Revision 1 File 146.154 Attachment 2 Page 1 of 1

## Heatup Walkdown Problem Report

	Heatup Walkdown Package Number: 15	Problem No.:
	Piping System Description: <u>STEAM CEN 3 BLOWD</u>	OWN OUTSIDE CONTAINMENT
	Analysis Number of Piping Where Problem is Located:	1-113
		(list only one)
	Describe Problem: PIPE CLAMP ON 15-115 SL 15 0	UP AGAINST STEEL
	OF ADJACENT HANGER S75-188R, CAUSING AN	UNINTENTIONAL AXIAL
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#### STRESS WALKDOWN PROBLEM RESOLUTION

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Disposition Requested From: \_\_\_\_\_ Engineering GC to cope \_\_\_\_\_ and offs K7 Construction and offset pipe clamp. as described on the attached drawing. D. Tateonian 8/25/83 Final Resolution:

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	ATTACHMENT II	<u>I</u>	•	•.
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#### ATTACHMENT IV

#### SECTION 2

### THERMAL RADIAL EXPANSION OF LARGE DIAMETER PIPING WITH REGARD TO POTENTIAL BINDING DUE TO RIGID SUPPORT GAP CLOSURE

#### 2.0 Description of Program, Development, and Followup Information

On large diameter hot piping a concern may exist that due to the small clearances in the restrained direction of a rigid frame-type pipe support, the radial expansion of the pipe may be sufficient to close the gaps and result in the pipe binding within the restraint. At Diablo Canyon the only piping where this condition may exist is the feedwater, main steam, and diesel engine exhaust lines.

The diesel engine exhaust lines were addressed as a part of the design process in that all of the frame type restraints were replaced by sway struts where this concern does not exist.

The feedwater and main steam lines have thermal diametric growths of approximately 1/16" and 1/8", respectively. Because these growths are about the size of the seismic gap typically designed into a pipe support, no special reviews were undertaken. However, this issue is addressed as a part of the piping walkdowns in that if the pipe was to bind it would become apparent by virtue of the actual piping movements being different than predicted. As a result, the binding problem would be identified and corrective action taken.

In fact, this happened during the Unit 2 kot Functional testing on the main steam piping. As a result of observing one pipe support to be binding, the walkdown team undertook a special review to walkdown all of the frame-type supports on main steam to see if any others were binding. As a result, appproximately eight such supports were modified to provide increased clearance.

A cold walkdwon of feedwater piping and supports will be performed prior to fuel load to assure the existance of sufficient gaps. The hot walkdown of this piping will occur during power ascension and will consider hot support gaps, as well as piping deflections and clearances.

In summary, the normal design review process and the existing walkdown programs will ensure that this potential binding condition will not occur in the final accepted piping and pipe support configuration.

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