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 MANGAN, C.V. Niagara Mohawk Power Corp.
 RECIPIENT NAME RECIPIENT AFFILIATION
 SCHWENCER, A. Licensing Branch 2

SUBJECT: Requests approval to utilize new criterial for response spectrum seismic analysis of piping as permitted by Reg Guide 1.61, Paragraph c.2.

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Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

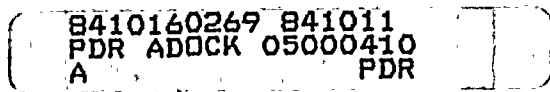
Dear Mr. Schwencer:

Re: Nine Mile Point Unit 2
Docket No. 50-410

The pressure vessel research counsel technical committee on piping design has developed new criteria for damping values used in piping seismic analysis. The new pressure vessel research counsel criteria on damping allow 5% damping for system frequencies less than 10 Hz, with linear reduction of damping to 2% at 20 Hz for operating basis earthquake and safe shutdown earthquake events. A recent Nuclear Regulatory Commission sponsored study (NUREG/CR-3526) has concluded that although the pressure vessel research counsel damping values reduce conservatism, a significant amount remained when compared with multi-support time history procedures.

Niagara Mohawk requests the NRC approval to utilize these new damping criteria for response spectrum seismic analysis of piping as permitted by paragraph c.2 of Regulatory Guide 1.61. The new damping criteria will be used as an alternative to the damping values given in Regulatory Guide 1.61 for seismic analysis of piping. These criteria would only be used when necessary to resolve design or as-built verification items. When used, the new criteria will be applied in their entirety to both operating basis earthquake and safe shutdown earthquake analysis. After Nuclear Regulatory Commission approval is received, the Final Safety Analysis Report will be revised accordingly.

Very truly yours,



C. V. Mangan
C. V. Mangan
Vice President
Nuclear Engineering & Licensing

NLR:ja
xc: Project File (2)
R. Gramm, NRC Resident Inspector

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