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U. S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 260
Walnut Creek, California 94596

Attention: Mr. B. H. Faulkenberry
Chief Reactor Projects Section I

Dear Mr. Faulkenberry:

We are employees of Robert L. Cloud Associates and were involved with the creation of the "Preliminary Report, Seismic Reverification Program" at Diablo Canyon Nuclear Power Plant, Units 1 and 2. As engineers, we are concerned and confused about the two exceptions noted in the Inspection Report NUREG-0862. As major contributors to the "Preliminary Report" we feel the two exceptions reflect poorly on our engineering professionalism. Therefore, we are taking this opportunity to request clarification on certain items so that we might better understand the Commission's conclusions.

Exception 1, page 6 of the Inspection Report NUREG-0862, deals with a revision to Section 3.3.5.1.1 of the "Preliminary Report, Seismic Reverification Program". The Commission states "it is questionable whether R. L. Cloud obtained sufficient data to justify the deletion of the reference to the URS/Blume three dimensional non-linear seismic analysis dated July 1979."

Regarding Exception 1, we question why the URS/Blume analysis dated July 1979 is relevant to Section 3.3.5.1.1, which is titled "Containment Polar Crane" and deals with said qualification. The Commission explicitly states in the Inspection Report the NRC verified that the two-dimensional analysis was used in the Hosgri Report, not the three-dimensional analysis. It is our contention that it is perfectly acceptable to delete the three-dimensional analysis reference from this section describing the qualification of the Polar Crane if the three-dimensional analysis was not used in its qualification.

Exception 2, page 7 of the Inspection Report deals with Section 3.3.5.1.2 of the "Preliminary Report, Seismic Reverification Pro-

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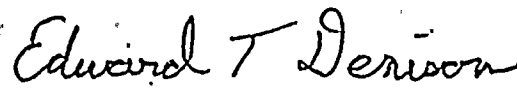
gram". This section of the report addresses the review of the Dome Service Crane qualification documentation. The NRC concluded that the Dome Service Polar Crane analysis was qualified using results of a three-dimensional Polar Crane analysis which was not used to qualify the Polar Crane itself. This conclusion appears to be the basis for questioning the actual qualification of the Dome Service Crane. An additional reference to the Dome Service Crane appears on page 11, second paragraph of the Inspection Report. The report states, "Since there were several URS/Blume analyses for the Polar Crane (one of which was used for input to the Dome Service Crane seismic qualification), this procedure was not adequate."

We would like to point out to the Commission that a very important item was apparently omitted from the Inspection Report Summary. URS/Blume completed the three-dimensional Polar Crane analysis and performed a design review accepting the analysis. The analysis report was sent to PGandE and we have seen no information which would invalidate this three-dimensional analysis. We feel that since both two-dimensional and three-dimensional analyses appear to be valid, how can the Commission infer that "...there was insufficient documentation/justification available..." concerning the seismic inputs from the Polar Crane analyses. We contend that either analysis could be used as input to the Dome Service Crane qualification analysis.

In closing, we would like to add that we feel our work on the "Preliminary Report, Seismic Reverification Program" to be of the highest engineering quality and is somewhat tainted by the two exceptions noted in the Commission's Inspection Report. We thank you for taking the time to read our letter and we sincerely look forward to an informative response.

Sincerely yours,


Paul H. Anderson


Edward T. Denison

PHA/ETD:ljs

cc: P. J. Morrill
J. R. Fair

