



September 3, 1982

Mr. Paul O'Connor
 Project Manager
 Operating Reactors Branch No. 5
 Division of Licensing
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555

Subject: Dresden 2
 SEP Topic Topic III-6, Seismic Design Considerations

NRC Docket 50-237

Reference: (a) Telcopy from G. Cwalina (NRC) to S. Powers (CECo) dated August 18, 1982; Subject: J.D. Stevenson's of Stevenson & Associates, letter to T. Nelson of Lawrence Livermore Laboratory dated July 23, 1982.

(b) T.J. Rausch letter to P.W. O'Connor dated July 7, 1982.

Dear Mr. O'Connor:

Per your request, we have reviewed Dr. J.D. Stevenson's comments as given in reference (a). The following information is our response in the sequence of his comments regarding stress resultants determined in piping supporting motor operated valves:

1. The estimated valve weight of 120 lbs. was based on the heaviest accessible massive valve, whether it is motor operated or pneumatic, provided in the piping samples that were selected for the study purpose. It is to be noted that estimating a valve's weight and its C.G. based on the actual configuration of the valve is an acceptable approach and is consistent with NRC IE Bulletin #79-14 guidelines in the absence of the original valve drawing and its related data.

The sample valves used for the analysis (Reference b) are the following:

<u>Valve No.</u>	<u>Valve Type</u>	<u>Line No.</u>	<u>P&ID</u>	<u>Description</u>
A0-2-1601-58	Air-Operated	2-8505-1 1/2"	M-25	Pressure Suppression Piping
A0-2-1601-59	Air-Operated	2-85-8-1 1/2"	M-25	Pressure Suppression Piping
M0-2-1402-38A	Motor-Operated	2-1407-1 1/2"	M-27	Core Spray Piping
CV-0302-21A	Air-Operated	2-0326-1"	M-34	Control Rod Drive Piping

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2. The original criterion of combining the piping subsystem X, Y, and Z excitation responses was employed, which is the maximum of (X + Y) versus (Y + Z), since the seismic analysis was performed using the original response spectra as provided in Blume Report of October, 1969. The modified response spectra resulted from Dresden-SEP evaluation, were not employed and thus, the original criterion of combining the system responses is still applicable.

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3. The stress levels addressed in the final results are the primary stresses, which include: the design pressure stress based on the exact corresponding design pressure of the system, the weight stress as well as the seismic stress. The last two stresses were calculated with the proper stress intensification factors in accordance with ANSI B31.1-1967 code requirements.

It is Edison's belief that based on the study findings as well as by addressing the Stevenson & Associates comments, as indicated above, the seismic structural adequacy of all the massive valves used in small diameter piping in Dresden plant have been verified.

Please address any questions you may have concerning this matter to this office.

One (1) signed original and forty (40) copies of this transmittal have been provided for your use.

Very truly yours,



T.J. Rausch
Nuclear Licensing Administrator
Boiling Water Reactors

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cc: RIII Resident Inspector, Dresden
Gregg Cwalina, SEP Integrated
Assessment Project Manager