P. O. BOX 529100, MIAMI, FL 33152

FLORIDA POWER & LIGHT COMPANY

January 4, 1980
L-80-1

50-335

Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII:JPO
Docket 50-335
IE Bulletin 79-02

The following information is provided as an amendment to our previous response to IE Bulletin 79-02 (FPL Letter L-79-183 dated July 5, 1979) and addresses the item in Inspection Report 50-335/79-22 regarding inspection records for supports on 2 inch and smaller piping systems.

In September and November 1977, Florida Power & Light Company (FPL) reported to the NRC the results of their inspection of support anchorages installed at St. Lucie 1. The results of the 1977 inspections along with other analyses formed the basis for FPL's response to IE Bulletin 79-02. The conclusion of the work in 1977 was that "In summary, all our efforts have confirmed that the as-built pipe supports are adequate and satisfy the FSAR design criteria". The NRC accepted the 1977 report without comment.

The inspections and verification in 1977 were performed on the 2½ inch and larger pipe supports. The supports in general carry larger loads, are larger in size, and utilize larger anchors than 2 inch and under supports. The same design criteria, fabrication inspections, and installation procedures apply to small bore pipe supports (2 inch and under) as to large bore pipe supports. The same craftsmen, under the same supervision, installed all pipe supports. Therefore, the conclusions reached with respect to the large bore pipe supports apply as well to the small bore pipe supports.

The loads on small bore pipe supports are generally smaller. The anchorages for small bore pipe supports were selected from standards prepared for this purpose. These standards were developed for a range of loads to be used in lieu of a unique design for each support. The loads applied to these anchorages in general are much smaller than the maximum loads these anchorages can accept. In all cases the applied load is within the conservatively designed maximum load for that anchorage. In addition, the small bore pipe supports were designed using a static analysis. This analysis is more conservative, by a factor of at least 1.5, than the dynamic analysis used for large bore piping as shown in FSAR section 3.7.3.4.4.

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Therefore, it is our position that since the 2½ inch and larger anchorage installations were found to be adequate and satisfied the FSAR design criteria, and since the 2 inch and under anchorages were designed more conservatively than the 2½ inch and larger anchorages and since all supports were installed under the same conditions, the 2 inch and under support anchorages are also adequate and satisfy the FSAR design criteria.

The inspection records are available at the site for review.

Very truly yours,

Robert E. Uhrig

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/TCG/ah

cc: Harold F. Reis, Esquire