

FEB 06 1987

Docket Nos. 50-250, 50-251  
50-335, 50-389

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Mr. C. O. Woody, Group Vice President  
Nuclear Energy Department  
Florida Power and Light Company  
Post Office Box 14000  
Juno Beach, Florida 33408

Dear Mr. Woody:

Subject: Use of American Society of Mechanical Engineers (ASME) Code Case N-411 for Turkey Point Plant, Units 3 and 4, and St. Lucie Plant, Units 1 and 2

By letter dated October 31, 1986, we responded to your request to use ASME Code Case N-411, "Alternative Damping Values for Response Spectra Analysis of Class 1, 2 and 3 Piping, Section III, Division I," at your Turkey Point and St. Lucie Plants.

We indicated that the Commission had issued Regulatory Guide (RG) 1.84, "Design and Fabrication Code Case Acceptability ASME Section III Division 1," Revision 24, dated June 1986. Code Case N-411 has been found acceptable by the staff for use without prior NRC staff approval provided conditions specified in the Regulatory Guide are met. However, as discussed with members of your staff, we indicated that additional guidance to ensure proper implementation of the regulatory positions specified in RG 1.84 would be provided for your consideration (enclosed).

We would also like to note that the staff has reviewed all uses of Code Case N-411 to assure conformance with these guidelines. Although RG 1.84 allows use of the subject code case without prior NRC staff approval, we request that you submit the details relating to the use of Code Case N-411 in relation to the guidance provided to assure conformance to the regulatory positions specified in RG 1.84 prior to the use of Code Case N-411 at your Turkey Point or St. Lucie Plants.

Should any additional clarification be needed please contact the Turkey Point Project Manager, Mr. Daniel McDonald on (301) 492-4777 or the St. Lucie Project Manager, Mr. Edmond Tourigny on (301) 492-8007.

Sincerely,

Lester S. Rubenstein, Director  
PWR Project Directorate No. 2  
Division of PWR Licensing-A

Enclosure: As stated

cc w/enclosure: See next pages

LA:PAD#2  
D. Miller  
2/2/87

LA:PRD#8  
P. Kreutzer  
2/3/87

DMcDonald  
2/4/87

LRubenstein  
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PDR ADOCK 05000250  
P PDR

SECRET

Mr. C. O. Woody  
Florida Power and Light Company

Turkey Point Plant

cc:

Harold F. Reis, Esquire  
Newman and Holtzinger, P.C.  
1615 L Street, N.W.  
Washington, DC 20036

Administrator  
Department of Environmental  
Regulation  
Power Plant Siting Section  
State of Florida  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Mr. Jack Shreve  
Office of the Public Counsel  
Room 4, Holland Building  
Tallahassee, Florida 32304

Regional Administrator, Region II  
U.S. Nuclear Regulatory Commission  
Suite 2900  
101 Marietta Street  
Atlanta, Georgia 30323

Norman A. Coll, Esquire  
Steel, Hector and Davis  
4000 Southeast Financial  
Center  
Miami, Florida 33131-2398

Martin H. Hodder, Esquire  
1131 NE, 86th Street  
Miami, Florida 33138

Mr. C. M. Wethy, Vice President  
Turkey Point Nuclear Plant  
Florida Power and Light Company  
P.O. Box 029100  
Miami, Florida 33102

Joette Lorion  
7269 SW, 54 Avenue  
Miami, Florida 33143

Mr. M. R. Stierheim  
County Manager of Metropolitan  
Dade County  
Miami, Florida 33130

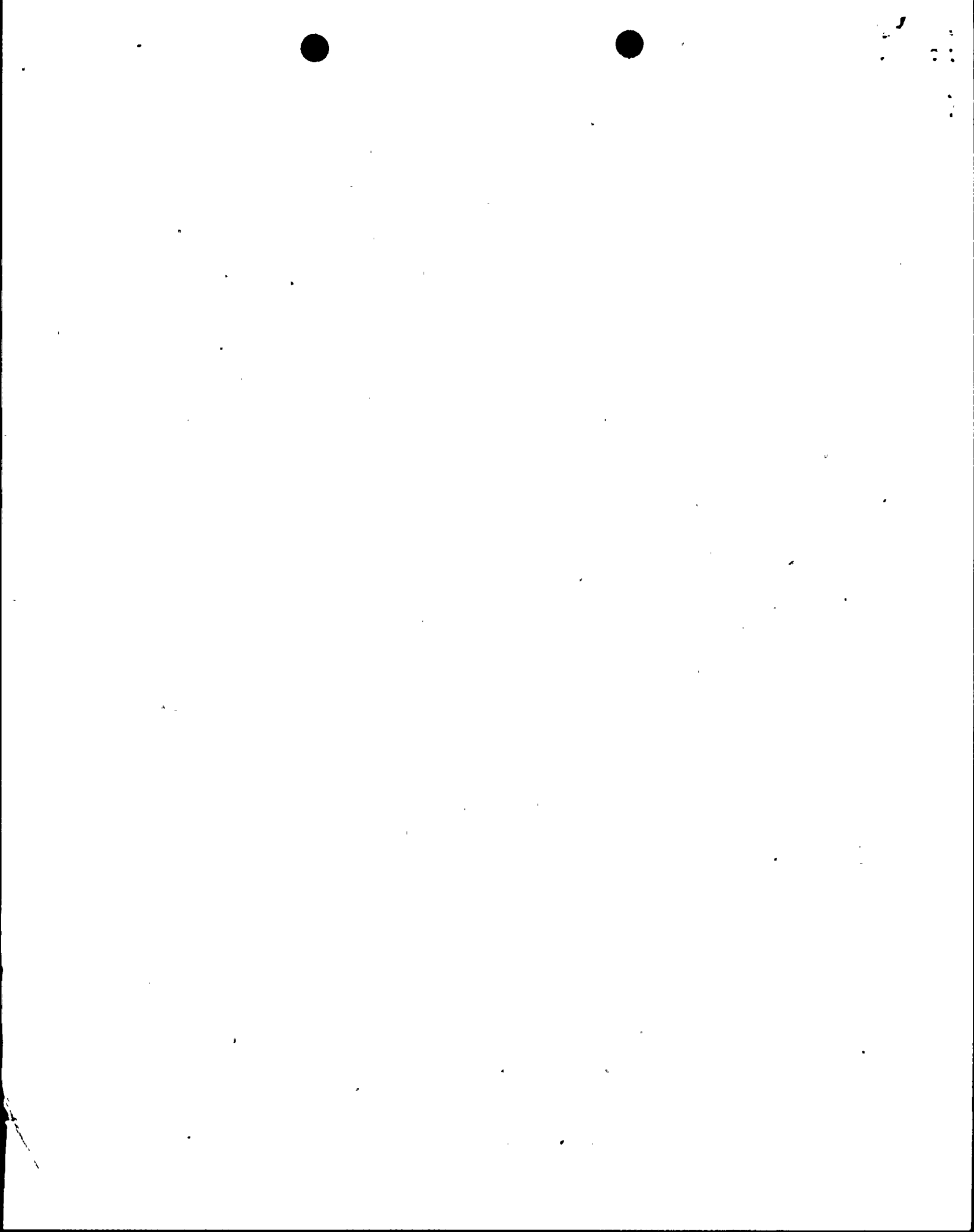
Mr. Chris J. Baker, Plant Manager  
Turkey Point Nuclear Plant  
Florida Power and Light Company  
P.O. Box 029100  
Miami, Florida 33102

Resident Inspector  
U.S. Nuclear Regulatory Commission  
Turkey Point Nuclear Generating Station  
Post Office Box 57-1185  
Miami, Florida 33257-1185

Attorney General  
Department of Legal Affairs  
The Capitol  
Tallahassee, Florida 32304

Mr. Allan Schubert, Manager  
Office of Radiation Control  
Department of Health and  
Rehabilitative Services  
1317 Winewood Blvd.  
Tallahassee, Florida 32301

Intergovernmental Coordination  
and Review  
Office of Planning & Budget  
Executive Office of the Governor  
The Capitol Building  
Tallahassee, Florida 32301



Mr. C. O. Woody  
Florida Power & Light Company

St. Lucie Plant

cc:

Mr. Jack Shreve  
Office of the Public Counsel  
Room 4, Holland Building  
Tallahassee, Florida 32304

Mr. Allan Schubert, Manager  
Public Health Physicist  
Department of Health and  
Rehabilitative Services  
1323 Winewood Blvd.  
Tallahassee, Florida 32301

Resident Inspector  
c/o U.S. NRC  
7585 S. Hwy A1A  
Jensen Beach, Florida 33457

Regional Administrator, Region II  
U.S. Nuclear Regulatory Commission  
Executive Director for Operations  
101 Marietta Street N.W., Suite 2900  
Atlanta, Georgia 30323

State Planning & Development  
Clearinghouse  
Office of Planning & Budget  
Executive Office of the Governor  
The Capitol Building  
Tallahassee, Florida 32301

Harold F. Reis, Esq.  
Newman & Holtzinger  
1615 L Street, N.W.  
Washington, DC 20036

Norman A. Coll, Esq.  
McCarthy, Steel, Hector and Davis  
14th Floor, First National Bank Building  
Miami, Florida 33131

Administrator  
Department of Environmental Regulation  
Power Plant Siting Section  
State of Florida  
2600 Blair Stone Road  
Tallahassee, Florida 32301

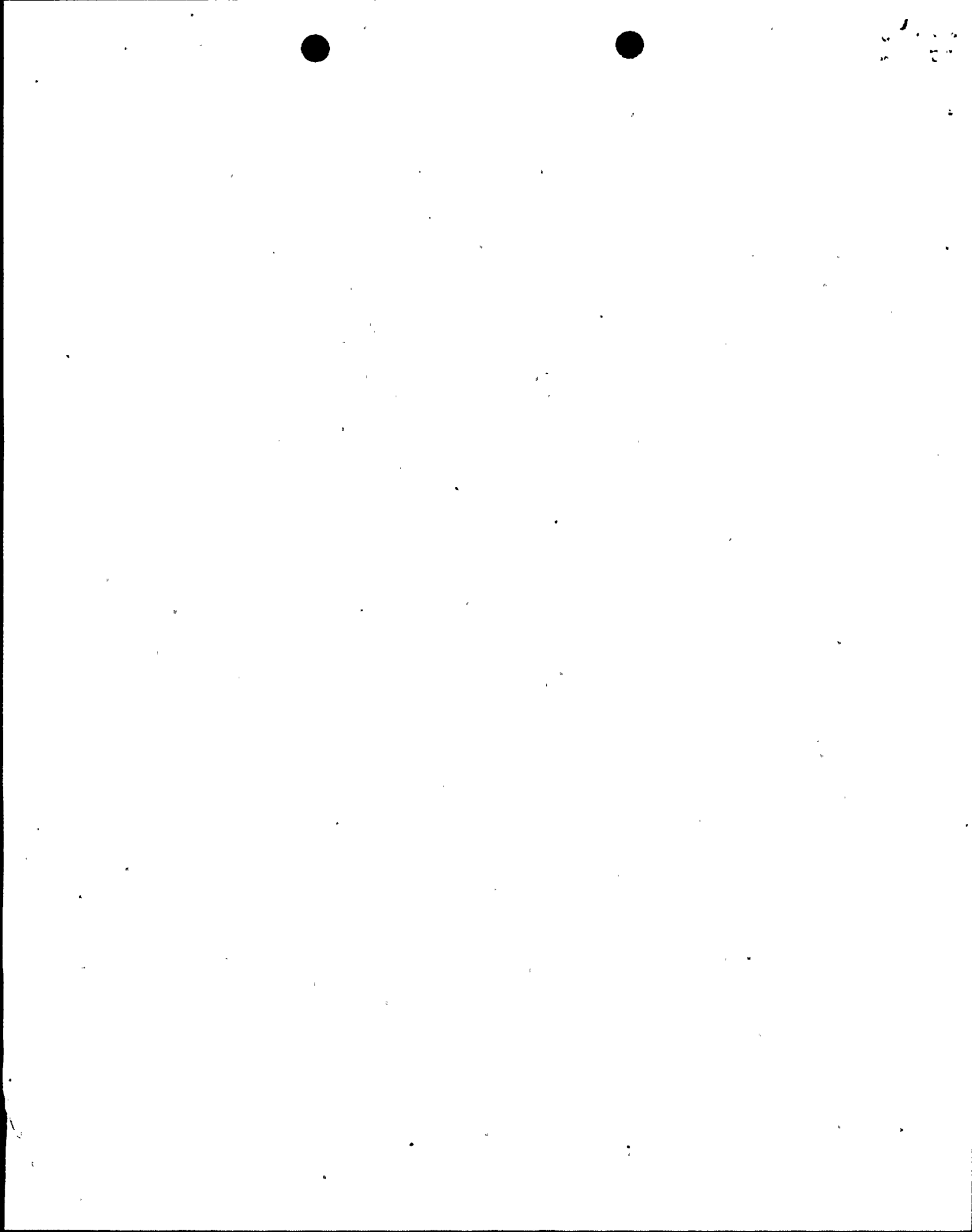
Mr. Weldon B. Lewis, County  
Administrator  
St. Lucie County  
2300 Virginia Avenue, Room 104  
Fort Pierce, Florida 33450

Mr. Charles B. Brinkman, Manager  
Washington - Nuclear Operations  
Combustion Engineering, Inc.  
7910 Woodmont Avenue  
Bethesda, Maryland 20814

Enclosure

Additional Guidances for Implementing Code Case N-411  
Florida Power and Light Company

1. The damping values specified in Code Case N-411 may be used only in those analyses in which current seismic spectra and procedures have been employed. Seismic ground motions defined by the Housner spectra cannot be considered as "current". Details on seismic input to be used in conjunction with the use of Code Case N-411 damping values in the snubber optimization program(s) should be documented.
2. For equipment other than piping the damping values specified in Regulatory Guide 1.61, "Damping Values for Seismic Design of Nuclear Power Plants," should be used.
3. The damping values specified in Code Case N-411 may be used only in analyses which assume an upper bound envelope of the individual response spectra for all support locations to calculate maximum inertial responses of multiply-supported items. Seismic input by other means, such as time histories and independent support motions, should not be used in conjunction with the new damping values.
4. It must be verified that the cumulative effect of the changes of loads on piping supports that are in turn supported by a structural element of a building, such as walls, slabs, beams and columns, does not exceed the load carrying capacity of the affected structural element.
5. The FSAR and other applicable documents must be amended as previously indicated. The application of Code Case N-411 shall be described in the FSAR and a commitment shall be included in the FSAR to maintain in the licensee's engineering records a current list and individual files of all pipe stress packages reanalyzed using Code Case N-411.



6. Where predicted maximum piping displacements using Code Case N-411 criteria exceed the current design calculations by an amount greater than acceptable tolerance levels, a physical verification of the availability of adequate clearance with adjacent structures, equipment and components must be performed. For equipment mounted on piping such as valves with extended structures, proper account must be taken for both rotation and translation in arriving at the predicted maximum displacement at the extreme ends of pipe mounted equipment.



