



GENERAL ATOMIC

GENERAL ATOMIC COMPANY
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February 15, 1979

Mr. William Gammill
Assistant Director for Advanced Reactors
Division of Project Management
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Gammill:

Enclosed are fifty (50) copies of General Atomic Company's response to your Additional Information Request on H-451 graphite of February 5, 1979. We trust that this response, in conjunction with our previous responses to your requests for additional information, will provide you with sufficient information to complete your review by your committed date of March 31, 1979.

Sincerely,

G. L. Wessman, Director
Plant Licensing Division

GLW:mk

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STATE OF CALIFORNIA)
) ss.
COUNTY OF SAN DIEGO)

After being duly sworn, the person known to me to be G. I. Wessman of General Atomic Company, signed the within document this 15th day of February 1979.

WITNESS my hand and official seal.



Brenda B. Dawson

Notary Public

RESPONSE TO NRC QUESTION 130.2(b) ON H-451 GRAPHITE

QUESTION

130.2(b) In your response to 130.(b), you indicated that the seismic analysis of FSV H-327 reactor internals was conducted as a dynamic analysis, treating the core as a monolithic beam. Since the reactor core is basically a three-dimensional structure and can be subjected to multi-directional earthquakes, provide a discussion on the validity of using such a simplified mathematical model and procedure of analysis. The discussion should be based on the state-of-the-art information available on the subject matter.

RESPONSE

The seismic analysis of the Fort St. Vrain H-327 reactor internals has been accepted by the NRC (AEC) as a satisfactory basis for determining the acceptability of the core mechanical design. No evidence is available to indicate that use of more complex mathematical models and analysis procedures would obtain inadequate margins for the protection of public health and safety. Furthermore, none of the state-of-the-art information and procedures referred to have been validated, approved by NRC, or accepted by NRC for determining core seismic safety margins on the Fort St. Vrain project. Accordingly, their use would not be appropriate.