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Water Reactor
Divisions

Nuclear Technology Division

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September 9, 1980

NS-TMA-2304

Mr. Richard P. Snaider
Generic Issues Branch
U. S. Nuclear Regulatory Commission
1717 H Street
Washington, D. C. 20555

Dear Mr. Snaider:

Subject: Additional Comments on NUREG-0577

Reference: NS-TMA-2290 dated August 7, 1980

Thank you for the opportunity to discuss NUREG-0577 at your meeting with industry representatives on August 27, 1980. The opinion of the Westinghouse representatives who attended the meeting is that the meeting was constructive and provided a good exchange of information.

This letter documents several of the comments made by Westinghouse at that meeting. These comments are in addition to the comments identified in my reference letter.

1. NUREG-0577 does not distinguish between integral and non-integral supports. Integral supports, characterized by integral attachments to the pressure boundary, have had more restrictive fracture toughness requirements. NUREG-0577 does not acknowledge these differences.
2. NUREG-0577 should consider A688 and A471 (AISI 4340 chemistry) which are primary materials of construction for supports.
3. The KISCC curves do not appear to be consistent with available data. In addition, they do not cover A540, A688 or A471 steels (AISI 4340) used extensively for component supports and for nuclear component bolting.

I hope that these comments and the other discussion provided by Westinghouse at the August 27, 1980, meeting are useful in your planned revision of the NUREG document.

Very truly yours,

T. M. Anderson, Manager
Nuclear Safety Department

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