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Docket Nos. SEN 50-482, SEN 50-483, SEN 50-484,
SEN 50-485 and SEN 50-486

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Rochester Gas & Electric Corporation
 ATTN: Mr. John Arthur
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Kansas Gas & Electric Company
 ATTN: Mr. Glenn L. Roester
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Gentlemen:

SUBJECT: REINFORCING STEEL COVER TOLERANCES IN CONTAINMENT STRUCTURE
FOR SNUPPS PLANTS

By letter, dated February 13, 1977, from Nicholas A. Petrick, the SNUPPS utilities requested that we confirm the design requirements for the SNUPPS containment structure, as discussed at a meeting held on January 23, 1978, between representatives of the Commission's staff and the SNUPPS utilities and their contractors.

The specific issue for which the February 13, 1978 letter requested resolution concerns the minimum concrete cover over reinforcing steel on the outer face of the containment structure. For this minimum, the SNUPPS PSAR refers to BC-IDP-5 which states that the minimum concrete cover shall be two inches. At the January 23, 1978 meeting, your representatives stated that this minimum cover can be reduced by construction tolerances.

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Union Electric Company
 Rochester Gas & Electric Corporation - 2 -
 Northern States Power Company
 Kansas Gas & Electric Company

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We have completed our evaluation of the information presented in the February 13, 1978 letter and the results of our evaluation are presented in the Enclosure. As stated in the Enclosure, we reaffirm our position, as presented at the January 13, 1978 meeting, that the minimum concrete cover over reinforcing steel on the outer face of the containment structure shall be no less than two inches.

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Please advise us if you have any questions concerning our evaluation.

Sincerely,

Original Signed by,
 O. D. Parr
 Olan D. Parr, Chief
 Light Water Reactors Branch No. 3
 Division of Project Management

Enclosure:
 As Stated

cc w/enclosure:

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OFFICE	LWR #3-CPM	LWR #3-RC			
SURNAME	ELicitra/LLM	ODParr			
DATE	3/10/78	3/12/78			

ENCLOSURE

STAFF EVALUATION OF THE
DESIGN CRITERIA FOR SNUPPS PLANTS CONTAINMENT STRUCTURE

In a letter to E. G. Case dated February 13, 1978, the applicant has submitted information in support of its contention that the reinforcing steel cover for the concrete containment may be a minimum of 1-1/3 inches and a maximum of 1-1/2 inches. The basic issue is whether the minimum and maximum reinforcing steel cover specified by the code may be altered by placement tolerances.

The applicant has presented the following arguments in support of its position:

- (1) The design and placing drawings conform to the minimum and maximum cover requirements as specified in BC-TOP-5A which is referenced in the SNUPPS PSAR. These are the same requirements as specified in CC-3534 and CC-3535 of Division 2 of the ASME B & PV Code. However, the applicant claims that the tolerances permitted by Section 3.8.1.6.6.1 of the PSAR allow variations in the minimum and maximum values.
- (2) A reference to the ACI Committee 224 Report has been cited that states "the cracking mechanism in two-way action slabs and plates is controlled only to a small extent by the magnitude of the concrete cover". Furthermore, they note that the containment is prestressed which will minimize the potential for any significant crack openings.
- (3) They have performed calculations in accordance with Reference 2 as cited in their letter that demonstrates that there will be sufficient bond development with a minimum cover of 1-1/3 inches.
- (4) Imposition of more stringent requirements will necessitate revision of the reinforcing steel detail drawings, thus necessitating reinforcing redesign of the containment.

The staff has reviewed the applicant's submittal and the referenced documents and has drawn the following conclusions:

- (1) The minimum and maximum covers specified in BC-TOP-5A are controlling for both design and construction. The specified cover should be appropriately modified to accommodate the placing tolerances stated in Section 3.8.1.6.6.1. The staff notes that its position is consistent with a code interpretation made by the Working Group on Design of Section III, Division 2, of the ASME B & PV Code. As noted by the applicant, this interpretation was not supported by the Subgroup on Materials, Construction and Examination and therefore has not been resolved within the code committee. However the staff feels that the Working Group on Design should have the jurisdiction on this matter.

- (2) The applicant's reference to ACI Committee Report 224 does not present any conclusive evidence regarding the absolute minimum cover requirements for corrosion protection. It is also noted that the same report states that for beams and one-way slabs "the thickness of the concrete cover is an important variable, but not the only geometric consideration".
- (3) The applicant has not presented the calculations that demonstrate there will be sufficient bond development with a cover of 1-1/3 inches. Their conclusion does not appear to be consistent with the conclusion in Reference 2 which states: "Comparison of current provisions for development length with the proposed design recommendations shows that for minimum cover current provisions are unconservative".
- (4) The staff does not believe that its interpretation of the cover requirements will have a significant cost impact on the applicant. An increase in the specified cover may necessitate a drawing change, but it should not require a redesign of the containment. If a change in the depth of a section is a concern, it could be accommodated by a tightening of the placing tolerances. It is noted that the applicant's placing tolerances are greater than those specified in both ACI 318-71 and ACI 349-76. - -
- (5) The staff is also concerned that the applicant's interpretation of cover requirements could result in a cover as small as 1/2 inch for the mechanical connectors used with #18 bars.

In conclusion, the staff's position is the same as that stated in the January 23, 1978 meeting with the applicant. It is summarized as follows:

1. The staff considers that the commitment of a 2-inch minimum concrete cover for the concrete containment, as made in Section CC-3533.1 of Appendix C to BC-TOP-5 for #6 through #18 reinforcing steel, controls both design and construction. The value is a minimum, meaning that the absolute minimum cover to assure corrosion control in the actual construction shall not be less than 2 inches. The staff expects for Callaway, Unit #1 that by wall lift #6 all reinforcing in sizes #6 through #18 will meet this requirement.
2. The staff considers that the commitment of a depth of not more than $t/5$ to reinforcing steel, that is considered face reinforcement as made in Section CC-3534 of Appendix C to BC-TOP-5, controls design and construction. The value is a maximum as rounded to the next whole

inch, meaning the absolute maximum depth in order to provide surface crack control for the concrete containment. The staff expects for Callaway, Unit #1 that by wall lift #6 all face reinforcing will meet this requirement. The staff will consider special cases on this requirement where necessary wall blockouts may require local variations to the maximum depth to face reinforcing.

3. The staff considers items 1 and 2 to apply only to the concrete containment as indicated by the applicant's commitments. ACI 318-71 provisions, as committed to by the applicant, will govern requirements similar to these for the other Category I structures.

ATTACHMENT 7