MEMORANDUM FOR: Richard L. Black, Office of the Executive Legal Director
FROM: jus C. Lainas, Assistant Director for Operating Reactors, Division of Licensing, Office of Nuclear Reactor Regulation

SUBJECT:
SUPPLEMENTAL STAFF TESTIMONY ON RANCHO SEC MEMORANDUM AND ORDER DATED MARCH 8, 1982 - HPI NOZZLE CYCLES

In response to the Rancho Secco ASLAB Memorandum and Order dated October 7, 1981, your April 9, 1982 memo transmitted John F. Stolz's affidavit to the ASLAB. The purpose of the affidavit was to provide the current status of the NRC staff's review of SMUD's initial response to Item No, 6 of the Memorandum and Order. Item No. 6 requested the following information: "SMUD and staff schedules for HPI analysis". In particular, the Board was concerned with the maximum allowable number of thermal cycles on the HPI nozzles.
Your August 18, 1982 memo to the ASLAB contained Dr. Shou-Nien How's testimony regarding the staff's review of SMUD's HPI nozzle analysis submittal. Dr. Hou's testimony indicated that the staff review will be completed by September 15, 1982. Accordingly, the enclosed testimony from Shou-Nien Hou supplies the requested information.

The staff has concluded that the HPI nozzles are adequately designed to sustain 70 manual actuation cycles in addition to the originally designed 1) 40 test cycles, 2) 40 rapid depressurization cycles and 3) heatup and cooldown cycles. Pressure loads, thermal transients and earthquake cycling effects were considered and combined in the analysis.

This information completes our response to the Board's Memorandum and Order dated March 8, 1982 on the subject of HPI nozzle cycles.


Gus C. Lainas, Assistant Director for Operating Reactors Division of Licensing

## Enclosure:

Affidavit of Shou-Nien How

## cc w/enclosure:

MPadovan, DL

