DUKE POWER COMPANY P.O. BOX 33189 CHARLOTTE, N.C. 28242

HAL B. TUCKER VICE PRESIDENT NUCLEAR PRODUCTION

December 6, 1982

TELEPHONE (704) 373-4531

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Attention: Ms. E. G. Adensam, Chief Licensing Branch No. 4

Re: Catawba Nuclear Station Docket Nos. 50-413 and 50-414

Dear Mr. Denton:

On November 3 and 4, 1982, representatives from Duke Power Company, the NRC Mechanical Engineering Branch (MEB), and Pacific Northwest Labs (MEB consultant), met in Charlotte to discuss the open items which remained from previous meetings. Attached is a list of attendees and a meeting summary.

Very truly yours,

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Hal B. Tucker

ROS/php Attachment

cc: Mr. James P. O'Reilly, Regional Administrator U. S. Nuclear Regulatory Commission Region II 101 Marietta Street, Suite 3100 Atlanta, Georgia 30303

Mr. P. K. Van Doorn NRC Resident Inspector Catawba Nuclear Station

Mr. Robert Guild, Esq. Attorney-at-Law P. O. Box 12097 Charleston, South Carolina 29412

Palmetto Alliance 2135½ Devine Street Columbia, South Carolina 29205

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cc: Mr. Jesse L. Riley Carolina Environmental Study Group 854 Henley Place Charlotte, North Carolina 28207

> Mr. Henry A. Presler, Chairman Charlotte-Mecklenburg Environmental Coalition 943 Henley Place Charlotte, North Carolina 28207

Mr. Gordon Beeman Pacific Northwest Laboratories Richland, Washington 99352 November 3, 1982 Meeting: Duke Power with NRC-MEB

Attendance

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M. L. Childers	Duke-SRAL/Licensing
R. O. Sharpe	Duke-Nuclear Production/Licensing
R. R. Weidler	Duke-Design Engineering/M&N
L. B. Castles	Duke-Design Engineering/M&N
J. N. Underwood	Duke-Design Engineering/M&N
W. L. Culpepper	Duke-Design Engineering/M&N
C. L. Ray, Jr.	Duke-Design Engineering/M&N
D. Terao	NRC/MEB
Grant Marr	PNL
Gordon Beeman	PNL
K. N. Jabbour	NRC/DL/LB#4
R. W. Bonsall	Duke-Design Engineering/M&N
D. L. Caldwell	Duke-Design Engineering/M&N

November 4, 1982

Site Visit - Mechanical Engineering Branch

Attendance

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M. L.	Childers	Duke-Design	Engineering/Licensing
R. R.	Weidler	Duke-Design	Engineering/M&N
L. B.	Castles	Duke-Design	Engineering/M&N
W. L.	Culpepper	Duke-Design	Engineering/M&N
Gordo	n Beeman	PNL	
Grant	Marr	PNL	

DUKE - NRC/MEB MEETING November 3 and 4, 1982

The following items were discussed. Agenda item numbers from previous meetings are noted where appropriate.

1. Criteria for Jet Impingement and documentation of exceptions (Item 17).

Resolution - Duke discussed their reasons for extending pipe whip criteria to include the effects of jet impingement. The NRC was in basic agreement and it was agreed that Duke would provide examples to demonstrate the validity of this approach. The proposed FSAR revision is attached. This item was closed.

2. Postulated Break Locations (Item 18).

1.

Resolution - The NRC reviewed Duke's proposed FSAR revision (attached). This item was closed.

3. Alternate Criteria for Reanalysis.

Resolution - The NRC reviewed Duke's proposed FSAR revision (attached). This item was closed.

4. Terminal End Breaks (Item 19).

Resolution - Duke provided a proposed FSAR revision (attached) that would assure that breaks were postulated in non-seismic piping and for interaction/effects with components. This item was closed.

5. Documentation of Limited Break Areas (Item 20).

Resolution - Duke agreed to provide an FSAR revision (attached) that would address this concern. This item was closed.

6. Unrestrained Whipping Pipe Inside Containment (Item 22).

Resolution - Duke agreed to provide an FSAR revision (attached) that would provide justification for isolated cases and would include system geometry, hanger location, hanger configuration, etc. This item was closed following the site visit.

7. Piping Vibration Test Program (Items 77 and 78)

Resolution - Duke agreed to submit a response as soon as possible. This item remains open.

 Interaction of Non-Seismic Piping Systems with Seismic Category 1 Systems.

Resolution - See Item 4 above.

9. Damping Valves

Resolution - This item will be resolved between Duke and the NRC's Structural Engineering Branch.

10. Functional Capability of Essential Systems (Item 86).

Resolution - Duke agreed to provide an analysis based on the attached criteria.

11. NF Jurisdictional Boundaries and use of .78 Critical Buckling (Item 76)

Resolution - Duke referred to the attached response. This item was closed following the site visit.

12. Response to IEB 79-02.

Resolution - This item is under review by the NRC.

13 and 14. Inservice Testing

Pesolution - Duke agreed to submit a program description by April 1983.

15. Bellows Penetrations (Item 35)

Resolution - The attached response was provided. This item was closed.

16. Computer Code Verification (Item 63)

Resolution - Duke agreed to provide a response by January 1, 1983.

17. Postulated Break Locations

Resolution - Duke agreed to provide a summary of postulated break locations in FSAR Section 3.6.2.5.

18. Classification of Systems (Items 117, 118, 119, 120, and 121).

Resolution - Duke agreed to provide a response (attached).

Summary of November 4, 1982 Site Visit

Unrestrained Pipe Whip

NRC and Duke representatives field reviewed the two inside containment unrestrained pipe whip cases. Both postulated breaks occur on the 2 inch line from the regenerative heat exchanger to the letdown heat exchanger. NRC representatives concluded that there were no problems with these two break locations being unrestrained based upon as-erected piping configurations and targets.

Math Models

The NRC and Duke representatives reviewed two math model break postulation problems, NI-07 (loop 1D accumulator tank injection line into the cold leg) and NI-12 (loops 1A and 1D hot leg injection from the safety injection pump).

- a) NI-07 The field review included postulated break locations and pipe whip arresters, i.e., pipe whip restraints and the crane wall, for restraint function.
- b) NI-12 The field review included postulated break locations and pipe whip arresters, i.e., pipe whip restraints, for restraint function.
- 19. Intersystem LOCA (Item 96)

Resolution - Duke provided a draft copy of Technical Specification 3/4.4.7.2, Operational Leakage. This specification will be submitted as discussed in FSAR Chapter 16. A copy of this Technical Specification and the referenced Flow Diagrams are attached. PART OF Item 1

CNS

- 3) Seismic loadings equivalent to the Operating Basis Earthquake (OBE) are used in the analysis of piping systems for the purpose of postulating break locations. Protective structures are designed to withstand the effects of the postulated piping failure in combination with loadings associated with the Operating Basis Earthquake (OBE) and Safe Shutdown Earthquake (SSE) within the respective design load limits for the structures.
- e) Consideration is given to the potential for a random single failure of an active component subsequent to the postulated pipe rupture. Where the postulated piping break is assumed to occur in one of two or more redundant trains of a dual-purpose moderate-energy essential system (i.e., one required to operate during normal plant conditions as well as to shut down the reactor and mitigate the consequences of the piping rupture), single failures of components in the other train or trains of that system only are not assumed; provided the system is designed to seismic Category I standards, is powered from both offsite and onsite sources, and is constructed, operated, and inspected to quality assurance, testing, and inservice inspection standards appropriate for nuclear safety systems.
- f) In the event of a postulated break in the piping in one unit, safe reactor shutdown of the affected unit cannot preclude the capability for safe shutdown of the reactor of the unaffected unit(s).
- g) Containment structural integrity is maintained by limiting the combination of break sizes and types to the design basis capability (i.e., temperature, pressure, and leakage rate) of the containment.
- h) For those postulated breaks classified as a loss-of-reactor coolant, the design leak tightness of the containment fission product barrier shall be maintained.
- i) The conditions within the control room or any other location where manual action is required to assure safe shutdown to the cold condition are such as to assure habitability and comply with the requirements of General Design Criterion 19.
- j) A whipping pipe or jet is assumed not to cause failure of other pipes of equal or greater size and equal or greater thickness. Smaller and thinner pipes are assumed to encounter unacceptable damage upon impact. A whipping pipe or jet is considered capable of developing through-wall leakage cracks in equal or larger nominal pipe sizes with thinner wall thicknesses, except where experimental or analytical data for the expected range of impact energies demonstrate the capability to withstand the impact without failure.

- Add below here.

k) Piping Breaks Within The LOCA Boundary (See Figure 3.6.2-1)

 All LOCA breaks are allowed to damage any non-LOCA line except essential systems, and steam and feedwater lines.

> If such exception is taken, the analytical technique or experimental data used will be documented in the FSAR.

Ierminal ends are considered as piping originating at structures or components . (such as vessel and equipment nozzles and structural piping anchors) that act as rigid constraint to the piping thermal expansion. Typically, the anchors assumed for the piping code stress analysis would be terminal ends. The branch connection to the main run is one of the terminal ends of a branch run, except intersections of runs of comparable size and fixity which have a significant effect on the main run need not be considered terminal ends when the stress analysis model includes both the run and branch piping and the intersection is not rigidly constrained to the building structure.

CNS

- a) Breaks in Duke Class A piping are postulated at the following locations (see Table 3.2.2-3 for class correlations):
 - The terminal ends of the pressurized portions of the run.
 - At intermediate locations selected by either one of the following methods:
 - At each weld location of potential high stress or fatigue, such as pipe fittings (elbows, tees, reducers, etc.), valves, flanges, and welded attachments, or

Item # 18

- ii) At all intermediate locations between terminal ends where the following stress and fatigue limits are exceeded.
 - a) The maximum stress range shall not exceed 2.4 S except as noted below.
 - b) The maximum stress range between any two load sets (including the zero load set) shall be calculated by Eq. (10) in Paragraph NB-3653, ASME Code, Section III, for normal and upset plant conditions and an operating basis earthquake (OBE) event transient.

If the calculated maximum stress range of Eq. (10) exceeds the limit (2.4 S) but is not greater than 3 S, the limit of U < 0.1 shall be met.

If the calculated maximum stress range of Eq. (10) exceeds 3 S_m, the stress ranges calculated by both Eq. (12) and Eq. (13) in Paragraph NB-3653 shall not exceed 2.4 S_m or the limit of U < 0.1.

where: '

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= primary-plus secondary stress-intensity range, as calculated from Equation (10) in Subarticle NB-3600 of the ASME Boiler and Pressure Vessel Code, Section III.

U shall not exceed 0.1

#2 (Sten 18)

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DCP/SOP	s _n /s _m	Sm	s _n	Comp. type	
43/66W	2.614	16,292	42,587	AWBW	
94/160W	2.942	16,292	47,931	FILW	2.241
69/99W	2.480	16,328	40,493	AWBW	
-Equation	1 10 stres		L		
n-Equation m-allowab n and Sm	n 10 stres le stress stresses a	s re given i	n psi.	REFERENCE: Computer Sec 80/11/03. 19	4. # 5.25.4
n-Equation m-allowab n and S _m	n 10 stres le stress stresses a	s re given i Duke Power	n psi.	REFERENCE: Computer Sec 80/11/03. 15	4. # 5.25.4
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DCP/SOP	s _n /s _m	Sm	s _n	Comp. type	
52/93W	2.562	16,292	41,740	AWTT	
55/97W	2.563	16,292	41,756	AWBW	
71,71A/ 132R,133I	2.780	16,328	45,392	BELB	
71A/133L	2.756	16,328	45,000	AWTT	
73/135W	2.725	16,292	44,396	AWTT	
75/139W	2.564	16,292	41.773	AWBW	
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S_{m} -allowable S_{m} and S_{m} st	stress e stress tresses an	s re given ir	n psi.	REFERENCE: Computer S 80/10/31.	: Seq. #
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		Catawba Un:	it #1		
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	DCP/SOP	s _n /s _m	Sm	s _n	Comp. type]
	19/20W	2.770	20,000	55,400	FILW	
1.11	24/26W	2.419	20,000	48,380	FILW	
	25/27W	2.466	20,000	49,320	FILW	
	25,26/ 27R, 28L	2.989	20,000	59,780	SELB	
	26/28W	2.474	20,000	49,480	FILW	
	-42/55W	2.743	20,000	54,860	FILW	1.000
	44/58R	2.699	20,000	53,980	SELB	
	44A/59W	2.539	20,000	50,780	FILW	
	38/93B	2.665	20,000	53,300	STEE	
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DCP/SOP	s _n /s _m	Sm	Sn	Comp. type	
13/34W	2.503	17,430	43,627	AWTT	
A14/36W	2.510	17,430	43,749	AWBW	
18/47W	2.866	17,430	49,954	AWTT	
C07B/30L	2.791	17,430	48,647	BELB	
Sn-Equation	n 10 stres	S			
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		Duke Power	Company		
		Catawba Un	it #1		
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DCP/SOP	s _n /s _m	Sm	s _n	Comp. type	
AA2B/8W	2.504	17,430	43,645	FGBW	
45/15W	2.406	20,000	48,120	AWTT	
45A/16W	2.447	20,000	48,940	AWTT	
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DCP/SOP	s _n /s _m .	Sm	s _n	Comp. type
10A/10W	2.949	16,820	49,602	AWBW
12B,13/				
14R,15L	2.480	16,820	41,714	BRED
13/15W	2.471	16,820	41,562	FILW
15A/17W	2.429	20,000	48,580	FILW
16/20W	2.482	20,000	49,640	FILW
17/21W	2.472	20,000	49,440	FILW
17AA/22W	2.427	20,000	48,540	FILW
148/135W	2.997	16,820	50,410	FILW
149D/141R	2.843	16,820	47,819	CRVP
149E/142L	2.986	16,820	50,225	CRVP
S_n -Equation S_n -allowabl S_n and S_m s	10 stres e stress tresses a	s re given i	n psi.	REFERENCE: Computer Sec 81/02/09. 17
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98/92W	2.466	16,820	41,478	FILW	
98,99/ 92R,93L	2.479	16,820	41,697	SRED	
181D/144W	2.784	20,000	55,680	FILW	
185A/146W	2.879	20,000	57,580	FILW	
187/148W	2.666	16,820	44,842	FILW	
187,187A/ 148R,149L	2.663	16,820	44,792	SRED	
189B/153W	2.876	16,820	48,375	AWBW	1.11
193/158W	2.616	16,820	44,001	AWBW	
S _n -Equation	10 stres	s			
S_{n} and S_{m} st	e stress tresses a	re given in	n psi.	REFERENCE Computer 81/01/30.	: Seg. # 08.40.56
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DCP/SOP	s _n /s _m	Sm	s _n	Comp. type	7
C01A/4W	2.435	19,800	48,213	AWBW	7
69A/87R	2.787	20,000	55,740	BELB	1.0.53
70/88L	2.810	20,000	56,200	BELB	
5 _n -Equation	n 10 stres:	S			
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DCP/SOP	s _n /s _m	Sm	Sn	Comp.
C31A/4W	2.706	19,800	53,579	AWBW
C71A/86R	2.531	20,000	50,620	CRVP
C71B/87L	2.581	20,000	51,620	CRVP
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S _n -Equation Sallowabl	10 stress	S	1.8	REJEPENCE:
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DCP/SOP	s _n /s _m	Sm	s _n	Comp. type	
34A/74W	2.455	16,820	41,293	AWBW	
36/76B	2.716	20,000	54,320	BTEE	
50A/85W	2.824	16,862	47,618	AWTT	
C15A/86W	2.527	16,862	42,610	AWTT	
C15A/86R	2.432	16,862	41,008	BELB	
C15B/87L	2.638	16,862	44,482	BELB	
C14A/90W	2.625	16,820	44,153	AWBW	
C14B/91WR	2.898	16,820	48,744	AWBW	
44/94R	2.599	16,862	43,824	BELB	
42/96L	2.692	16,862	45,393	BELB	
C11A/98W	2.713	16,820	45,633	AWBW	
C11B/99W	2.645	16,820	44,489	AWBW	
C18A/107W	2.586	16,820	43,496	AWBW	
C18B/108W	2.677	16,820	45,027	AWBW	
66/113R	2.585	16,862	43,588	BELB	
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68/115L 2.573 C21A/117W 2.924 C21B/118W 2.700	16,862	43,386	BELB
C21A/117W 2.924 C21B/118W 2.700	16.820		DUND
C21B/118W 2.700		49,182	AWBW
	16,820	45,414	AWBW
C22A/121W 2.664	16,862	44,920	AWTT
C22A/121R 2.722	16,862	45,898	BELB
C22B/122L 2.550	16,862	42,998	BELB
C22B/122W 2.617	16,862	44,128	AWTT
73A/123W 2.992	16,862	50,451	AWTT
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4/4R	2.447	16,840	41,207	BELB	
7AA/9R	2.549	16,840	42,925	BELB	
7BB/10L	2.489	16,840	41,915	BELB	
7CC/11R	2.439	16,840	41,073	BELB	
7DD/12L	2.506	16,840	42,201	BELB	
8/14R	2.591	16,840	43,632	BELB	
9/15L	2.614	16,840	44,020	BELB	
16/28R	2.949	16,532	48,753	BELB	
17/29L	2.944	16,532	48,670	BELB	
20W/36W	2.653	16,520	43,828	AWTT	
20C/39R	2.864	16,532	47,348	BELB	
80/48K	2.854	16,292	46,497	CRVP	
81/49L	2.871	16,292	46,774	CRVP	
81C/50R	2.832	16,328	46,241	BELB	
81E/52L	2.810	16,328	45,882	BELB	
81D/51W	2.917	16,328	47,629	AWBW	
83/56W	2.403	16,292	39,150	AWBW	
66/114W	2.981	16,820	50,140	FILW	
65/115W	2.776	20,000	55,520	FILW	
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	DCP/SOP	s _n /s _{in}	Sm	s _n	Comp. type	
	34B/123R	2.517	16,820	42,336	CRVP	
1.2	34C/124L	2.532	16,820	42,588	CRVP	
	45B/144L	2.460	16,800	41,328	CRVP	
	46A/146R	2.644	16,800	44,419	CRVP	
	46B/147L	2.663	16,800	44,738	CRVP	
	47A/149R	2.627	16,800	44,134	CRVP	
	47B/150L	2.472	16,800	41,530	CRVP	
	50/156R	2.545	16,800	42,756	CRVP	
	71/183W	2.794	20,000	55,880	FILW	
1	72/184W	2.773	20,000	55,460	FILW	
	117/192W	2.552	16,292	41,577	AWBW	
	142/226R	2.989	16,800	50,215	BRED	
	145/230L	2.826	16,800	17.476	BRED	
	S_and S	n 10 stres le stress	55		REFERENCE: Computer Se	q. #
	n and Sm	stresses a	ire given in p	51.	82/03/26. 1	7.03.29
			Duke Power Co	ompany		
			Catawba Unit	#1		
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DCP/		s _n /s _m	Sm	S	n	Comp. type
31/32		2.975	16,328	48,	576	BELB
32M		2.623	16,328	42,	828	BELB
32N		2.582	16,328	42,	159	BELB
320		2.748	16,328	44,	869	BELB
32P		2.834	16,328	46,	274	BELB
33		2.877	16,292	46,	872	CRVP
34		2.770	16,292	45,	129	CRVP
35		2.555	16,328	41,	718	BELB
36		2.585	16,328	42,	208	BELB
62		2.560	16,328	41,	800	BELB
63		2.888	16,840	48,	634	BELB
69		2.980	16,840	50,	183	BELB
75A		2.842	16,520	46,	950	AWTT
78B		2.588	16,520	42,	754	AWTT
101Z		2.823	16,800	47,	426	AWBW
101Y		2.414	16,800	40,	555	AWBW
101A		2.854	16,800	47,	947	CRVP
101C		2.723	16,800	45,	746	CRVP
1011		2.700	16,800	45,	360	AWBW
117		2.885	20,000	57,	700	FILW
112		2.554	16,292	41,	610	AWBW
118		2.774	20,000	55,	480	FILW
S _n -Equ	ation	10 str	ess			
S _m -allo	owable	stres	S			REFERENCE:
Sn and	S _m st	resses	are given i	n psi.	152	82/03/23
 			Duke Pouro	Com	2011	02/03/23.
			Catawba Ur	nit #1	iny	
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DCP/SOP	s _n /s _m	Sm	s _n	Comp. type	
126	2.766	20,000	55,320	FILW	
5 -Equatio	n 10 stres	c			
n -allowab	le stress			REFERENCE	:
in and C	stresses a	re given in	psi.	Computer	Seq. #
n and Sm				82/03/23.	17.47.3
n and Sm				1	
n and Sm		Duke Power	Company	J	
n and S _m		Duke Power Catawba Un	Company it #1	0093-101	PAGE

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DCP/SOP	s _n /s _m	Sm	Sn	Comp. type
83,83/ 50R,51L	2.985	20,000	59,700	BELB
107,108/ 818,821	2 624	18 040	47 227	PPPD
108/82W	2.422	16,830	40.762	AWBW
SEquation	n 10 stres	S		
S _n -Equation S _m -allowab	n 10 stres le stress	S		REFERENCE :
S _n -Equation S _m -allowab S _n and S _m	n 10 stres le stress stresses a	re given in	n psi.	REFERENCE: Computer Seq.
S _n -Equation S _m -allowab S _n and S _m	n 10 stres le stress stresses a	s re given in Duke Power	n psi.	REFERENCE: Computer Seq. 80/09/29. 16.55
S _n -Equation S _m -allowab S _n and S _m	n 10 stres le stress stresses a	re given in Duke Power Catawba Un	n psi. Company it #1	REFERENCE: Computer Seq. 80/09/29. 16.55

DCP/SOP	s _n /s _m	Sm	s _n	Comp. type
88/123W	2.580	20,000	51,600	FILW
89/124W	2.870	20,000	57,400	FILW
94/130W	2.508	20,000	50,160	FILW
95/131B	2.750	20,000	55,000	STEE
104/137W	2.602	20,000	52,040	FILW
-110/148W	2.456	20,000	49,120	FILW
110,111/ 148R,149L	2.877	20,000	57,540	SELB
111/149W	2.442	20,000	48,840	FILW
118,118A/ 157R,158L	2.751	20,000	55,020	SELB
118B/159W	2.404	20,000	48,080	FILW
118B,120/ 159R,160L	2.888	20,000	57,760	SELB
120/160W	2.534	20,000	50,680	FILW
S _n -Equation S _m -allowabl S _n and S _m s	10 stres e stress tresses a	ss are given in Duke Power	n psi. Company	REFERENCE: Computer Sec 82/01/11. 17
		Catawba Un	it #1	
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DCP/SOP	s _n /s _m	Sm	Sn	Comp. type	
S4/4W	2.511	20,000	50,220	FILW	
S6/8W	2.681	20,000	53,620	FILW	
S7/9W	2.734	20,000	54,680	FILW	
S20/25W	2.467	20,000	49,340	FILW	
S31/39W	2.531	20,000	50,620	FILW	
S35/44W	2.835	20,000	56,700	FILW	
S36/45W	2.594	20,000	51,880	FILW	
				NO 1942-003	
SEquation	n 10 stres	s			
S _n -Equation S _m -allowab S _n and S _m	n 10 stres le stress stresses a	s re given in	n psi.	REFERENC Computer 81/08/13	E: Seq. # . 20.06.49.
S _n -Equation S _m -allowab S _n and S _m	n 10 stres le stress stresses a	s re given in Duke Power	n psi. Company	REFERENC Computer 81/08/13	CE: Seq. # . 20.06.49.
S_n -Equation S_m -allowab S_n and S_m s	n 10 stres le stress stresses a	s re given in Duke Power Catawba Un	n psi. Company it #1	REFERENC Computer 81/08/13	E: Seq. # . 20.06.49.

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DCP/SOP	s _n /s _m	Sm	Sn	Comp. type
81C/7W	2.662	20,000	53,240	FILW
77/10W	2.778	20,000	55,560	FILW
76/11W	2.847	20,000	56,940	FILW
74/13W	2.999	20,000	59,980	FILW
73/15W	2.810	20,000	56,200	FILW
72/16W	2.757	20,000	55,140	FILW
70,71/ 17R,18L	2.590	20,000	51,800	SELB
69,68/ 19R,20L	2.668	20,000	53,360	SELB
65/24W	2.645	20,000	52,900	FILW
63L/25W	2.597	20,000	51,940	FILW
63/37B	2.402	20,000	48,040	STEE
62/38W	2.502	20,000	50,040	FILW
61,60/ 39R,40L	2.755	20,000	55,100	SELB
59/41W	2.430	20,000	48,600	FILW
58/42W	2.815	20,000	56,300	FILW
S _n -Equation S _n -allowal	on 10 stres	SS	1	REFERENCE:
S _n and S _m	stresses a	are given i	n psi.	Computer Seq. 81/08/13. 18.48
		Duke Power	Company	
		Catawba Un	nit #1	
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DCP/SOP	s _n /s _m	Sm	s _n	Comp. type]
67/9R,10L	2.454	20,000	49,080	SELB	
12/16W	2.845	20,000	56,900	FILW	
13/17W	2.617	20,000	52,340	FILW	
14,15/ 18R,19L	2.523	20,000	50,460	SELB	
16,17/ 20R,21L	2.968	20.000	59.360	SELB	
17/21W	2.531	20,000	50,620	FILW	
21/28W	2.541	20,000	50,820	FILW	
31/40W	2.422	20,000	48,440	FILW	
16/20W	2.412	20,000	48,240	FILW	
S _n -Equation S _m -allowabl S _n and S _m s	10 stres e stress tresses a	re given in	n psi.	REFERENCE Computer 81/08/14.	Seq. 1
		Duke Power	Company		
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- Sm = allowable design stress-intensity value, as defined in Subarticle NB-3600 of the ASME Boiler and Pressure Vessel Code, Section III.
 - = the cumulative usage factor, as calculated in accordance with Subarticle NB-3600 of the ASME Boiler and Pressure Vessel Code, Section III.
- 3) If there are no intermediate locations where S exceeds 2.4 S or U

exceeds 0.1, a minimum of two locations are chosen based upon highest stress. Intermediate breaks are not postulated in sections of straight pipe where there are no pipe fittings, flanges, valves or welded attachments.

- 4) As a result of piping reanalysis which follows the completion of the original problem interaction analysis, the highest stress locations may be shifted; however, the initially determined intermediate break locations will not be changed unless one of the following conditions exists.
 - i) Maximum stress ranges or cumulative usage factors exceed the threshold levels in 2)ii) a), b) or c) above.
 - ii) A change is required in pipe parameters, such as major differences in pipe size or wall thickness.
 - iii) Breaks at the new highest stress locations are determined to have significantly higher stress values from the original locations, and result in consequences to safety related systems requiring additional safety protection.
- Breaks in Duke Class B and C piping are postulated at the following locations (See Table 3.2.2-3 for class correlations):
 - 1) The terminal ends of the pressurized portions of the run.
 - At intermediate locations selected by either one of the following methods:
 - at each weld location of potential high stress or fatigue, such as pipe fittings (elbows, tees, reducers, etc.), valves, flanges and welded attachments, or
 - ii) at all locations where the stress, S, exceeds 0.8 $(1.2S_{h} + S_{A})$,

where:

U

S = stresses under the combination of loadings associated with the normal and upset plant condition loadings and an OBE event, as calculated from the sum of equations

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(9) and (10) in Subarticle NC-3600 of the ASME Boiler and Pressure Vessel Code, Section III.

- S_h = basic material allowable stress at maximum (hot) temperature from the allowable stress tables in Appendix I of the ASME Boiler and Pressure Vessel Code, Section III.
- SA = allowable stress range for expansion stresses, as defined in Subarticle NC-3600 of the ASME Boiler and Pressure Vessel Code, Section III.
- 3) If there are not at least two intermediate locations where S exceeds $0.8 (1.2 \text{ S}_{\text{h}} + \text{S}_{\text{A}})$, a minimum of two separated locations are chosen based upon highest stress. Intermediate breaks are not postulated in sections of straight pipe where there are no pipe fittings, flanges, valves, or welded attachments. The pattern of postulated intermediate break locations is determined separately for the normal plant condition load combination and for that upset plant condition which has the highest stress.
- 4) As a result of piping reanalysis which follows the completion of the original problem interaction analysis, the highest stress locations may be shifted; however, the initially determined intermediate break locations will not be changed unless one of the following conditions exists.
 - i) Maximum stress ranges exceed the threshold level of 0.8 (1.25 $_{\rm h}$ + ${\rm S}_{\rm A}$).
 - ii) A change is required in pipe parameters, such as major differences in pipe size or wall thickness.
 - iii) Breaks at the new highest stress locations are determined to have significantly higher stress values from the original locations, and result in consequences to safety related systems requiring additional safety protection.
- c) Breaks in Duke Class E, F, G and H piping are postulated at the following locations (See Table 3.2.2-3 for class correlations)
 - 1) The terminal ends of the pressurized portions of the run.
 - 2) At intermediate locations selected by one of the following methods:
 - i) For Class E, F, G, and H Piping:

At each weld location of potential high stress or fatigue, such as pipe fittings (elbows, tees, reducers, etc.), valves, flanges, and welded attachments; or

ii) For Class F Piping:

· · · · ·

At all locations where the stress, S, Exceeds 0.8 (1.2 $S_h + S_A$), where:

- S = stresses under the combination of loadings associated with the normal and upset plant condition loadings and an OEE event, as calculated from the sum of equations (9) and (10) in subarticle NC-3600 of the ASME Boiler and Pressure Vessel Code, Section III.
- S_h = basic material allowable stress at maximum (hot) temperature, per ANSI B31.1.0.
- S_A = allowable stress range for expansion stresses, per ANSI B31.1.0.
- 3) For Class F Piping:

If there are not at least two intermediate locations where S exceeds 0.8 (1.2 $S_h + S_A$), a minimum of two separate locations are chosen based upon highest stress. Intermediate breaks are not postulated in sections of straight pipe where there are no pipe fittings, flanges, valves or welded attachments.

- 4) As a result of piping reanalysis which follows the completion of the original problem interaction analysis, the highest stress locations may be shifted; however, the initially determined intermediate break locations will not be changed unless one of the following conditions exists.
 - i) Maximum stress ranges exceed the threshold level of 0.8 (1.25 $_{\rm H}$ + ${\rm S}_{\rm A}$).
 - ii) A change is required in pipe parameters, such as major differences in pipe size or wall thickness.
 - iii) Breaks at the new highest stress locations are determined to have significantly higher stress values from the original locations, and result in consequences to safety related systems requiring additional safety protection.
- 3.6.2.1.2.2 Postulated Piping Break Locations For Moderate-Energy Piping Systems

Systems identified as containing moderate-energy piping are examined by detailed drawing review for postulated through-wall cracks as defined below. Systems analyzed for consequences of postulated piping cracks are listed in Table 3.6.1-2.

To assure protection of safety-related structures, supteme on components, CNS

break locations is determined separately for the normal plant condition load combination and for that upset plant condition which has the highest stress.

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- c) Preaks in Duke Class E, F, G and H piping are postulated at the following locations (See Table 3.2.2-3 for class correlations)
 - 1) The terminal ends of the pressurized portions of the run.
 - 2) At intermediate locations selected by one of the following methods:
 - i) For Class E, F, G, and H Piping:

At eachyweld location of potential high stress or fatigue, such as pipe fittings (elbows, tees, reducers, etc.), valves, flanges, and welded attachments; or

ii) For Class F Piping:

At all locations where the stress, S, Exceeds 0.8 (1.2 S_h + S_A), where:

S = stresses under the combination of loadings associated with the normal and upset plant condition loadings and an OBE event, as calculated from the sum of equations (9) and (10) in subarticle NC-3600 of the ASME Boiler and Pressure Vessel Code, Section III.

- S_h = basic material allowable stress at maximum (hot) temperature, per ANSI B31.1.0.
- S_A = allowable stress range for expansion stresses, per ANSI B31.1.0.
- 3) For Class F Piping:

If there are not at least two intermediate locations where S exceeds 0.8 (1.2 S + S_A), a minimum of two separate locations are chosen based upon highest stress. Intermediate breaks are not postulated in sections of straight pipe where there are no pipe fittings, flanges, valves or welded attachments.

3.6.2.1.2.2 Postulated Piping Break Locations For Moderate-Energy Piping Systems

Systems identified as containing moderate-energy piping are examined by detailed drawing review for postulated through-wall cracks as defined below. Systems analyzed for consequences of postulated piping cracks are listed in Table 3.6.1-2.



- Cracks in Duke Class B, C and F piping are postulated at the following a) locations:
 - The terminal ends of the pressurized portions of the run. 1)
 - At intermediate individual locations of potential high stress or 2) fatigue (e.g. pipe fittings, valves, flanges and welded attachments) that result in the maximum effects from fluid spraying, flooding or environmental conditions except in portions of piping where the maximum stress range is less than 0.4 (1.2 $S_{h} + S_{A}$) as defined in items b)2)ii) and c)2)ii) of Section 3.6.2.1.2.1.
- Cracks in Duke Class E, G and H piping are postulated at the following b) locations:
 - The terminal ends of the pressurized portions of the run. 1)
 - At intermediate individual locations of potential high stress or 2) fatigue (e.g. pipe fittings, valves, flanges and welded attachements) that result in the maximum effects from fluid spraying, flooding or environmental conditions.
- Postulated Break Type, Size, and Orientation 3.6.2.1.2.3
- Circumferential Pipe Breaks a)

The following circumferential breaks are postulated in high-energy fluid system piping at the locations specified in Section 3.6.2.1.2.1.

- Circumferential breaks are postulated in fluid system piping and 1) branch runs exceeding a nominal pipe size of 1 inch, except where the maximum stress range exceeds the limits of Section 3.6.2.1.2.1, items b) and c)2)ii) but the circumferential stress range is at least 1.5 times the axial stress range.
- Where break locations are selected in fittings in accordance with 2) Section 3.6.2.1.2.1 without the benefit of detailed stress calculations, breaks are postulated at each weld, in piping greather than one inch NPS, to the fitting, valve, or welded attachment. Alternately, a single break location at the section of maximum stress range may be selected as determined by detailed stress analyses or tests on a pipe fitting.
- any such limited Circumferential breaks are assumed to result in pipe severance and 3) separation amounting to at least a one-diameter lateral displacement of the ruptured piping sections unless physically limited by piping restraints. No limited break areas will be used for compartment pressurization calculations. If limited break areas are used for jet impingement reviews, the basis N will be the installation of rigid rupture restraints; and a break areas along with their locations will be documented in the FSAR.

- The dynamic force of the jet discharge at the break location is based 4) on the effective cross-sectional flow area of the pipe and on a calculated fluid pressure as modified by an analytically or experimentally determined thrust coefficient. Limited pipe displacement at the break location, line restrictions, flow limiters, positive pump-controlled flow, and the absence of energy reservoirs may be taken into account, as applicable, in the reduction of jet discharge.
- Pipe whipping is assumed to occur in the plane defined by the piping 5) geometry and configuration, and to cause pipe movement in the direction of the jet reaction. For the purpose of analysis, breaks are assumed to reach full opening size within one (1) millisecond after break initiation. Replace with words on attached page.

b) Longitudinal Pipe Breaks

The following longitudinal breaks are postulated in high-energy fluid system piping at the locations specified in Section 3.6.2.1.2.1.

- Longitudinal breaks in fluid system piping and branch runs are pos-1) tulated in nominal pipe sizes 4 inches and larger, except where the maximum stress range exceeds the limits of Section 3.6.2.1.2.1, items b) and c)2)ii) but the axial stress range is at least 1.5 times the circumferential stress range.
- Longitudinal breaks are not postulated at: 2)
 - Terminal ends provided the piping at the terminal ends contains a) no longitudinal pipe welds.
 - At intermediate locations where the criterion for a minimum b) number of break locations must be satisfied.
- Longitudinal breaks are assumed to result in an axial split without 3) pipe severance. Splits are oriented (but not concurrently) at two diametrically-opposed points on the piping circumference such that the jet reaction causes out-of-plane bending of the piping configuration. Alternately, a single split may be assumed at the section of highest tensile stress as determined by detailed stress analysis (e.g., finite element analysis).
- The dynamic force of the fluid jet discharge is based on a circular 4) or elliptical (2D x 1/2D) break area equal to the effective crosssectional flow area of the pipe at the break location and on a calculated fluid pressure modified by an analytically or experimentally determined thrust coefficient. Line restrictions, flow limiters, positive pump-controlled flow, and the absence of energy reservoirs may be taken into account, as applicable, in the reduction of jet discharge.

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Item 6

Unrestrained Whipping Pipe

Postulated pipe whip for target review will be defined by engineering judgement based on piping geometry, jet thrust direction, break location analysis type, and hanger location and type. When further confirmation is required, postulated piping breaks and targets are field seviewed after the drawing based analysis has been completed. For the purposes of analysis, breaks are assumed to reach full opening size in one millisecond after break initiation.

3.9.3.1, pages 3.9-40 to 43

This section does not address the criteria used to assure the functional capability of essential systems when they are subjected to loads in excess of those for which Service Limit B Limits are specified. By essential systems are meant those ASME Class 1, 2 and 3 and any other piping systems which are necessary to shut down the plant following, or to mitigate the consequences of an accident. Provide such criteria.

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RESPONSE TO QUESTION 86

On Catawba Nuclear Station Duke will apply the following criteria to essential piping in order to assure that functional capability is maintained when subjected to loads in excess to those for which Upset Limits are specified.

- Reference 1 will be applied to determine the acceptance of functional capability for ASME Class 1 piping and fittings.
- ASME Class 2 & 3 piping and fittings with the exception of stainless steel elbows will be accepted as meeting functional capability when the following equation is met:

$$\frac{PmaxDo}{4t_{n}} + \frac{0.75i (MA + 1.875MB)}{Z} \leq 1.8 \text{ Sh}$$

3. ASME Class 2 & 3 piping and fittings that do not meet equation 1 will be accepted as meeting functional capability when Do/tn \leq 50 and the following equation is met.

$$\frac{B1PmaxDo}{2t_n} + \frac{B2(MA + 1.875MB)}{Z} \leq 2.25 \text{ Sh} \begin{array}{c} \text{But not} \\ \text{greater} \\ \text{than } 1.8 \text{ Sy} \end{array}$$

Eq. 9 ASME Code NC-3600 W'81 addenda

4. ASME Class 2 & 3 stainless steel elbows will be accepted as meeting functional capability when Do/tn \leq 50 and the following equation is met.

$$\frac{B1PmaxDo}{2t} + \frac{B2(MA + 1.875MB)}{Z} \leq 1.8 \text{ Sy}$$

Eq. as developed by Westinghouse for Comanche Peak Steam Electric Station.

5. Reference 1 will be applied to determine the acceptance of functional capability for ASME Class 2 & 3 stainless steel elbows and those that do not meet equation 1 when 50 < Do/tn < 100.

The criteria as shown in 1 through 5 will be included in the FSAR. Reference

 NEDO-21985 "Functional Capability Criteria for Essential Mark II Piping," General Electric Company San Jose, CA 95125. Item 76 - 3.9.1.4.7, page 3.9-24

Provide your interpretation of jurisdictional boundaries as they pertain to NF supports. Justify your position.

Response:

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Subsection NF of the ASME Boiler and Pressure Vessel Code defines requirements for structural elements for both component supports and piping supports. In reviewing application of this subsection to structural elements of pipe supports Duke Power Company has defined jurisdictional boundaries to be within the scope of subsection NF when the ASME code provisions are clearly applicable and result in rational structural requirements for design and construction. Many aspects of structural steel design have a long and established history of adequate and reasonable application by structural engineers. For this reason, Duke Power Company uses applicable codes and standards other than ASME standards for the majority of structrual steel design associated with pipe supports. Boundaries between items designed and fabricated to Subsection NF and those designed and fabricated to codes and standards applicable to building structural items are clearly designated on all drawings released for construction. Guidelines for defining these standard boundaries are provided in Duke specification CNS-1206.00-04-0001 Design Specification For Nuclear Safety Related Component Supports (QA Condition 1). A copy of this document has been previously provided to NRC representatives.

As justification for our position we have been asked by the staff to show approximate equivalence across jurisdictional boundaries for several specific items.

 Presence of clearly defined structural requirements on both sides of the jurisdictional boundary.

The Design Specification clearly defines design criteria to be followed on both sides of the NF boundary. For both normal and upset conditions, structural steel is designed to normal allowable limits per AISC requirements, regardless of boundary. For the faulted condition, additional conservatism over and above that required by Appendix F is provided by limiting steel stress to 1.33 x AISC allowables within the NF boundary and to 1.5 x AISC allowables outside the NF boundary. This is consistent with allowable values used for building structural steel. Limiting stresses under faulted conditions to the elastic stress range as provided by these measures provides that the structure performs as predicted by elastic analysis procedures that are well documented and provides a degree of conservatism due to additional capacity in the inelastic range of materials which is not utilized.

2. Consideration of the relevance of buckling as a factor in support design.

For normal and upset conditions, use of AISC allowable stresses results in appropriate safety factors against buckling for these conditions.

Use of the 1.5 factor on AISC allowable stresses for the faulted condition subsequently reduces the safety factor against buckling but maintains adequate margins for this condition. In the region of "short column" buckling (for fy=36, $\underline{k1} \leq 126$) formulas presented by AISC

and use of the 1.5 factor allows values of allowable stress to approach 0.9 x yield strength. Critical buckling as presented by the Euler approach is not the predominant failure mode in this region. For KL/r values above the critical buckling coefficient, AISC limits stresses to 12/23 x critical buckling stress. Use of the 1.5 for faulted loading increases this limit to 18/23 x critical buckling stress. This value is slightly higher than the 2/3 value proposed by the staff.

In actuality, buckling strength is seldom the controling factor in structural steel for pipe support design. Bending and shear forces are the predominant limiting stress considerations. Coupling these limits with deflection limitations imposed on the supports, required to make the supports relatively stiff compared to the piping for stress analysis validation, removes most consideration of buckling from the analytical approach to pipe support design. Predomanance of tube steel in support design, primarily due to superior properties for torsional resistance, provides relatively low L/r ratios for design, further obviating the need for a stringent review of buckling as a critical factor. However, changing the design specification to account for a 2/3 factor on buckling rather than 18/23 would require individual review of each of more than 20,000 calculations already completed for Nuclear Safety Related pipe supports at the Catawba Station. In short, we feel the slight difference in buckling limits has little, if any, relevance in support design and the methods and allowable stresses used for Catawba present a safe and adequate situation.

3. Use of initial overdesign as an added conservatism.

Page 2 76

Beginning in December 1979, new support designs initiated for Catawba Nuclear Station were conservatively designed by incorporation of an additional 25% of piping loads supplied into design loads for the support. Rational for this conservatism included reduction of changes due to revised loadings by reanalysis and increased margin available when field conditions would not allow all elements of the design drawing to be fabricated per drawing requirements. Although such changes have resulted in encrouchment into the margin in many cases, for an even greater number of cases, the margin is now increased as piping loads have decreased. Coupled with the fact that the full capacity of a member is seldom used when structural engineers provide a design which is limited only by a maximum criteria, pipe support designs for the Catawba Station are certainly conservative and provide high confidence that adequate structures for pipe supports are produced.

Materials control and mill test certification reports.

Materials purchased for Catawba Nuclear Station are classified on site as either safety related or non-safety related. Materials used within the NF jurisdictional boundary which are not "bulk stock" items, such as component standard supports are purchased from an authorized supplier per Subsection NA-3700 and NCA-3800. Certified mill test reports in accordance with NF-2130(a) are obtained showing compliance with Section III Subsection NF requirements for Class I materials. Traceability of

Page 3 , # 76

component standard supports are maintained for Class A supports. Bulk stock items, such as miscellaneous steel are received on site with certified mill test reports. Tube steel inside the NF boundary is purchased to requirements of Code Case N-71-8.

Design drawings define materials specifications inside the NF jurisdictional boundary as SA/A showing that the appropriate ASTM specification and ASME specification are equivalent. Tube steel furnished per Design drawings reference Code Case N-71-8. Material furnished on Design drawings outside the NF boundary reference the appropriate ASTM specification. Both material inside and outside the NF boundary for structural items other than component standard supports are furnished from Nuclear Safety Related field bulk stock and are equivalent as certified mill test reports are furnished as previously mentioned. Receipt of CMTR's are part of initial receiving inspection procedures.

5. Weld inspection and NDE requirements.

Weld inspection inside the NF boundary is performed per Duke Power Company QA requirements for ASME Code work and meets requirements of Subsection NF, Article NF-5000. An Authorized Nuclear Inspector, independent of Duke Power Company, reviews each support package prior to fabrication. The ANI has opportunity to add inspection hold points and additional NDE requirements as appropriate.

All welders utilized for supports on ASME Code piping are qualified for both requirements of AWS D1.1 and ASME Section IX.

Predominant weld types on welds within and outside the NF boundary are fillet and partial penetration welds. Visual inspection is performed by qualified QC inspectors for all welds with other NDE requirements specified where appropriate.

 Duke Power Company control of design and construction and resultant "reasonableness" of job.

Duke Power Company designs, fabricates and erects the supports for Catawba Nuclear Station. This provides unique advantages in the enforcement of requirements both within the NF jurisdictional boundary and outside that boundary. The intent of specification requirements is maintained throughout the design and construction process through direct communication between designer, fabricator and erector. This close interface is not always possible when design, fabrication and erection are contracted to different companies. Item 35 - Table 3.6.1-3, page 3, SAR Section 3.6.2.4

Provide an example of the analysis conducted to assure that Duke penetration designs are acceptable.

Response

Duke presented an example analysis to determine torsional rotations. This analysis was acceptable to the NRC. The manufacturer of the bellows joint of the penetration assemblies has determined that the maximum resulting torsional rotations for the Main Steam and Feedwater penetrations are acceptable as follows:

Type I Main Steam System

Condition	Torsional Rotation
Normal	.00342 radians
Upset	.00369 radians
Faulted	.00374 radians
Faulted	.00374 radians

Type II Feedwater System

Condition Normal Upset

Faulted

Torsional Rotation

.00028 radians .00120 radians .00222 radians 117. Table 3.2.1-2

Waste Evaporator Feed Tank, RCP Motor Oil Drain Tank, Vent. Unit Cond. Drain Tank

Identify the OBE and SSE seismic requirement for these components.

Response: FSAR Table 3.2.1-2 (Page 1) has been revised to indicate the seismic requirements for these components.

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Table 3.2.1-2 (Page 1) Summary of Criteria - Equipment

		Quatity	(Note 3)			(Note 2)	Sais	al.c	Tarna	uđo	
Equipment	Scope	Required	Category	Code	Location	Source	OBE	SSE	Wind	Missile	Remarks - Including Any Environmental Requirements
Cranes		10	1.1	As Applicable	c						Containment Accident Pressure, Dead and Equipment,
concernment Porer creme									1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-		Live Loads, Hold Down Device, Note 1
Cask Crane	D	×	1	As Applicable	AB		×	×	•	•	Dead and Equipment, Live Loads, Hold Down Device, Note 1
Cranes (Excluding Reactor Buil	lding D		111	As Applicable	-		•	-			Dead and Equipment, Live Loads
Refueling Machine		x	1	As Applicable	C		x	x			
Fuel Handling Machine		x	1	As Applicable	AB		x	x			
Tanks											
Recycle Monitor	0		111	ASME VIII	AB						Class E
Laundry and Hot Shower	0		111	ASME VIII	AB		-		-		Class E
Waste Monitor	D		111	ASME VIII	AB		-				Class E
Mixing and Settling	0		111	ASME VIII	AB						Class E
Mixing and Settling Reagent	0		111	ASME VIII	AB		-			*	Class E
Floor Orain	0		111	ASME VIII	AB		-	-			Class E
Chemical Drain	0		111	ASME VIII	AB			-	-		Class E
RCB. Mat on this Bank surgers and	States and in case of	and the second s	No. of Concession, name	The state of the second st	States of the local division of the local di		~	~~			
Waste Gas Decay	0	X	TTI	ASME III	AB		A.	×			
Waste Drain	D	x	1	ASME III	AB		×	x			
Waste Evaporator Feed	0	x	1	ASME VIII	AB		-				
Vent. Unit Cond. Drain	0	х	1	ASME VIII	AB		-	-			Not Code Stamped
Spent Resin Storage	0	×	1	ASME III	AB		×	x			
Refueling Water Storage	D	x	1	ASME 111	YD		×	×			the second s
Reactor Makeup Water Storage	0		111	ASME VIII	¥0			-			Not Code Stamped
Boron Recycle Holdup	D	x	I	ASME III	AB		*		See Note (4)	(4)	
Boric Acid	0	x	1	ASME III	AB		×	×	See Note (4)	See Note (4)	
Eval Oil Storage	0		1	ASME 111	YD		x	×			Burled - Not Code Stamped
Formanent Facilian Surge	0	x	i i	ASME 111	AB		x	x			
Steam Cao Blondown	0		111	ASME VIII	TB			-			
Backwach	0		111	ASHE VIII	78		-				Not Code Stamped
linger Surge	õ		111	ASME VIII	TB						
Condensate Storage	0		141	ASME VIII	TB.			5 m			Not Code Stamped
linner Surge Dome	0		D1	ASME VIII	TB						
Evan Concentrate Holdun	ő		111	ASME VIII	AB						Class E - Not Code Stamped
Damin Water Storage	ñ		111	ASME VIII	58		*		×		
Heater Blownff	ő		111	ASME VIII	TO						
"/" Heater Drain	0	and the second se	111	ASHE VIII	TB						
BCW Storage	õ		111	ASME VIII	58		-				Not Code Stamped
Turbine Oil Transfer	0		111	ASME VIII	TB			-	1 A		Not Code Stamped
Fire Protection Pressuring	0	The second	111	ASME VIII	SB						
Filtered Water	0	10 A.	111	ASME VIII	58		*		x		Not Code Stamped
Y I Sulfueir Acid	0		111	ASME VIII	YD				x		Not Code Stamped
Evap Concentrates Batch	õ	-	111	ASME VIII	AB			•			Class E - Not Code Stamped

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118. Provide a P&I Diagram showing the Steam Generator Blowdown System. Response: See attached flow diagrams CN-1580-1.0 and CN-2580-1.0.