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June 28, 1984

Mrs. Juanita Ellis  
President, CASE  
1426 South Polk Street  
Dallas, Texas 75224

Subj: Texas Utilities Electric Company et al.  
(Comanche Peak Steam Electric Station,  
Units 1 and 2); Docket Nos. 50-445 and 50-466

Dear Juanita:

Enclosed are copies of documents CASE requested during our telephone conference regarding Applicants' various motions for summary disposition. We are also transmitting copies of these documents to the NRC staff. A list of the documents we are providing is set forth below, with a reference to the particular motion to which the documents relate.

Document Set

Subject

- 1. Calculation showing use of 2 and 4 percent damping parameter for computing coupling factors for closely spaced modes is conservative. (Applicants' Motion Regarding Alleged Errors Made In Determining Damping Factors)
- 2. Explanation of the linearity assumed for the load deflection curves for Hilti bolts. Enclosed is an explanation and two figures illustrating this point. (Applicants' Motion Regarding The Effects of Gaps)
- 3. Test data for PSA-1 snubbers, with attached explanation. (Item 2.) (Applicants' Motion Regarding The Effects of Gaps)

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4. Information regarding the modeling of snubbers by NPSI. CASE should note that NPSI does not model snubbers in that this activity is the function of the piping analyst. NPSI does provide necessary information to Gibbs & Hill for modeling the snubbers. We have enclosed a summary of the method for modeling snubbers with the ADLPIPE program. (Applicants' Motion Regarding the Effect of Gaps)
5. Tabulation of the effects of friction only on supports referenced in Applicants' Affidavit Regarding Consideration of Friction Forces. This information was prepared at the request of the NRC.

CASE also requested information regarding the survey of A/E firms concerning the use of generic stiffnesses, mentioned in Applicants' motion regarding the use of generic stiffnesses. This item was provided to the NRC Staff in the meeting held on June 20. It was incorporated into the transcript of that meeting, which we understand the Staff has provided to you.

Finally, CASE also requested an explanation of certain matters which Mr. Walsh raised during the conference calls. Accordingly, we provide the following information.

(1) Mr. Walsh questioned why it is appropriate to use damping factors from Regulatory Guide 1.61 for piping, when active valves and pumps which are on the piping are qualified for OBE damping factors only. In response to this inquiry, we provide the following response:

It is incorrect to assume that, because active valves or pumps may be located at a random point in the piping run, Regulatory Guide 1.61 (Table 1, Note 2) is intended to penalize the entire piping system by the use of lower damping factors simply because of the existence of the active component. The higher damping factors permitted for piping analysis for the SSE may be used to establish end loads for the active components. However, valves and pumps are normally specified and procured prior to piping analysis and are qualified for more stringent spectra than

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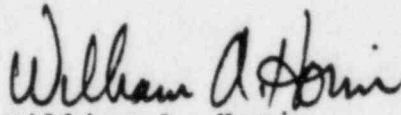
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the piping. Thus, spectra are furnished for those active components directly, which will reflect the lower damping factor of the OBE.

(2) Mr. Walsh asked what Gibbs & Hill's practice was regarding the consideration of friction in support design. We provide the following information:

Gibbs & Hill only designs moment restraints. For these supports the friction forces induced from deadweight plus thermal loads are small compared to the other support loads and, therefore, are neglected.

Sincerely,

  
William A. Horin  
Counsel for Applicants

Enclosures  
WAH/sea

cc: w/encl      NRC Staff  
      w/o encl    Remainder of Service List