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October 18, 1984

Docket No. 50-423 B11343

Director of Nuclear Reactor Regulation Mr. B. J. Youngblood, Chief Licensing Branch No. 1 Division of Licensing U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Reference: (1) W. G. Counsil letter to B. J. Youngblood, Request for Exemption From General Design Criterion 4, dated September 12, 1984.

Dear Mr. Youngblood:

## Millstone Nuclear Power Station, Unit No. 3 Modification to Request for Exemption from General Design Criterion 4

In accordance with agreements reached with the Mechanical Engineering Branch (MEB) Staff during the September 13, 1984 meeting at the Millstone site, Northeast Nuclear Energy Company (NNECO) hereby modifies the Reference (1) exemption request. All reference to considerations for including the P-1 snubbers in the exemption request should be disregarded.

Prior to the Reference (1) submittal, the analysis had identified that the concrete embedments for 2 out of the 44 snubbers installed on the reactor coolant loop (P-1 snubbers on the reactor coolant pumps in the A and B cubicles) could not develop sufficient strength to meet design allowable values for the faulted load case including the primary coolant loop LOCA effects. Since that submittal, the analysis of the embedments has been refined resulting in an acceptable design as currently installed. Therefore, since no modifications would be required to qualify the embedments, the P-1 snubbers need not be included in the Reference (1) exemption request.

A summery of the refined analysis follows. The structural supports for the P-1 snubbers in the A and B cubicles are reinforced concrete corbel type structures cast integrally with the surrounding floor slab and the cubicle walls extending above. The reanalysis has considered the interaction of all the reinforcing steel within the corbel, as well as the additional capacity obtained from the embedded steel extending from the surrounding wall and slab. The configuration of the support was reviewed and the potential failure surface was determined. The section was then analyzed as a corbel defined by ACI 318-71, using actual mill

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THE CONNECTICUT LIGHT AND POWER COMPANY WESTERN MASSACHUSETTS ELECTRIC COMPANY HOLYOKE WATER POWER COMPANY HORTHEAST UTILITIES SERVICE COMPANY MORTHEAST UTILITIES SERVICE COMPANY MORTHEAST NUCLEAR EMERGY COMPANY certifications for reinforcement and estimated concrete compressive strength from test results. As a result of incorporating the actual failure surface with the total reinforcing steel available to resist shear across this section, it has been determined that the corbel has adequate capacity to resist the postulated loads.

If you have any questions or concerns regarding this submittal, please feel free to contact my licensing staff directly.

Very truly yours,

NOR THEAST NUCLEAR ENERGY COMPANY et. al.

BY NORTHEAST NUCLEAR ENERGY COMPANY Their Agent

g. Coursel

Senior Vice President

By: W.F.Fee Executive Vice President

STATE OF CONNECTICUT

) ss. Berlin

Then personally appeared before me W. F. Fee, who being duly sworn, did state that he is Executive Vice President of Northeast Nuclear Energy Company, an Applicant herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Applicants herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

otary Public

My Commission Expires March 31, 1988