

SEABROOK STATION Engineering Office: 1671 Worcester Road Framingham, Massachusetts 01701 (617) - 872 - 8100

August 21, 1984

SBN- 705 T.F. B7.1.2

United States Nuclear Regulatory Commission Washington, D. C. 20555

Attention: Mr. George W. Knighton, Chief Licensing Branch No. 3 Division of Licensing

References:

- (a) Construction Permits CPPR-135 and CPPR-136, Docket Nos. 50-443 and 50-444
- (b) NUREG-0896, "Safety Evaluation Report Related to the Operation of Seabrook Station Units 1 and 2", dated March 10, 1983
- (c) PSNH Letter, dated August 9, 1984, "Alternate Pipe Break Design Criteria", J. DeVincentis to G. W. Knighton

Subject:

Safety Evaluation Report (SER) Outstanding Issue No. 5, "Loading Combinations, Design Transients, and Stress Limits"

Dear Sir:

In response to Safety Evaluation Report Outstanding Issue No. 5, which is delineated in Section 3.9.3.1, Reference (b), the Public Service Company of New Hampshire (PSNH) will summarize herein the methodology employed to ensure functional capability of essential ASME Class 1 piping at Seabrook Station. This summary is derived from an evaluation performed for PSNH by the Westinghouse Electric Corporation. This evaluation was based on the assumption that NRC approval has been granted for postulated Reactor Coolant Loop (RCL) pipe rupture elimination through the application of mechanistic fracture mechanics techniques. In Reference (c), PSNH requested that the Staff grant partial exemption from 10CFR50 Appendix A, General Design Criteria 4 (GDC-4) requirements for postulating breaks in RCL piping. Therefore, the validity of this report is contingent on your approval of this exemption request. Similar GDCR-4 exemption requests have already been approved for other utilities.

The analysis contained in the \underline{W} report was performed for essential Class 1 piping systems for which functional capability must be demonstrated. These piping systems were evaluated to the following three stress criteria:

 The ASME Boiler and Pressure Vessel Code, Section III, 1971 Edition, up to and including Winter 1972 Addenda. Subsection NB and Appendix F. This is the code of record as indicated the Seabrook FSAR.

B409120148 840821 PDR ADOCK 05000443 United States Nuclear Regulatory Commission Attention: Mr. George W. Knighton, Chief August 21, 1984 Page 2

- The ASME Boiler and Pressure Vessel Code, Section III, 1980 Edition, up to and including Winter 1981 Addenda, Subsection NB, Level C primary stress limits.
- 3. Westinghouse recommended Criterion for functional capability of Class 1 piping. This criterion is included as Attachment A.

Having evaluated the results of the <u>W</u> report, PSNH has concluded that functional capability of essential Class 1 Piping Systems has been sufficiently demonstrated. Justification for this conclusion is based on:

- The ASME Code evaluations were performed for approximately 4300 analysis points and of these only six analysis points exceeded the criteria allowables. The number of piping components (six) that exceeded criteria allowables were very few relative to the total number analyzed.
- 2. For the six points that exceed criteria allowables:
 - a. The maximum margin above Criterion 2 allowables was less than 9%.
 - b. The maximum margin above Criterion 3 allowables was less than 3%.
- 3. The resultant deformation of the piping components at these points would be minimal.
- Flow area for thick-walled piping components, in this case all being concentric reducers, not elbows, is not significantly reduced even for large displacements.

Consequently, PSNH feels that the functional capability of essential Class 1 Piping Systems has been sufficiently demonstrated. Your prompt review of this letter is requested.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

John Rectments

Engineering and Licensing

Attachment cc: Atomic Safety and Licensing Board Service List William S. Jordan, III Diane Curran Harmon, Weiss & Jordan 20001 S Street N.W. Suite 430 Washington, D.C. 20009

Roy P. Lessy, Jr., Esquire Office of the Executive Legal Director U.S. Nuclear Regulatory Commission Washington, DC 20555

Robert A. Backus, Esquire 116 Lowell Strees P.O. Box 516 Mancehster, NH 03105

Philip Ahrens, Esquire Assistant Attorney General Department of the Attorney General Augusta, ME 04333

Mr. John B. Tanzer Designated Representative of the Town of Hampton 5 Morningside Drive Hampton, NH 03842

Roberta C. Pevear Designated Representative of the Town of Hampton Falls Drinkwater Road Hampton Falls, NH 03844

Mrs. Sandra Gavutis Designated Representative of the Town of Kensington RFD 1 East Kingston, NH 03827

Jo Ann Shotwell, Esquire Assistant Attorney General Environmental Protection Bureau Department of the Attorney General One Ashburton Place, 19th Floor Boston, MA 02108

Senator Gordon J. Humphrey U.S. Senate Washington, DC 20510 (Attn: Tom Burack)

Diana P. Randall 70 Collins Street SEabrook, NH 03874

Donald E. Chick Town Manager Town of Exeter 10 Front Street Exeter, NH 03833 Brentwood Board of Selectmen RED Dalton Road Brentwood, New Hampshire 03833

Edward F. Meany Designated Representative of the Town of Rye 155 Washington Road Rye, NH 03870

Calvin A. Canney City Manager City Hall 126 Daniel Street Portsmouth, NH 03801

Dana Bisbee, Esquire Assistant Attorney General Office of the Attorney General 208 State House Annex Concord, NH 03301

Anne Verge, Chairperson Board of Selectmen Town Hall South Hampton, NH 03842

Patrick J. McKeon Selectmen's Office 10 Central Road Rye, NH 03870

Carole F. Kagan, Esq. Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Mr. Angie Machiros Chairman of the Board of Selectmen Town of Newbury Newbury, MA 01950

Town Manager's Office Town Hall - Friend Street Amesbury, Ma. 01913

Senator Gordon J. Humphrey 1 Pillsbury Street Concord, NH 03301 (Attn: Herb Boynton)

Richard E. Sullivan, Mayor City Hall Newburyport, MA 01950

ATTACHMENT A

Westinghouse Criteria for Demonstrating Functional Capability of Class I Piping Systems

Included herein are proposed Westinghouse criteria for demonstrating the functional capability of Class 1 piping. These criteria apply to piping systems with $P/t \leq 16$.

A. For elbows and bends, functional capability may be considered assured when the following requirement is met:

$${}^{2B_1} \frac{PD_1^2}{D_0^2 O_1^2} + B_2 \frac{M1}{Z} \le 1.8 S_y$$

where $B_1 = (-0.1 + 0.4h)$ and $0 \le B_1 \le 0.5$

$$B_{2} = \begin{cases} 1.3/h^{2/3} \text{ for } a_{0} > 90^{\circ} \\ 0.895 \ h^{0.912} > \text{ for } a_{0} = 90^{\circ} \\ 1.0 & \text{ for } a_{0} = 0^{\circ} \end{cases}$$

but not less than 1.0, linear interpolation may be used for $0 < a_n < 90^\circ$

Other terms defined in NB-3652, $Z = \frac{2I}{D_0}$, in.³.

B. For straight pipes, girth butt weld, girth fillet weld, girth socket weld connections, tapered transitions and longitudinal butt welds, functional capability may be considered assured when the following requirement is met:

¢

-2-

$$2B_1 \frac{PD_1^2}{D_0^2 - D_1^2} + B_2 \frac{M1}{Z} \le 1.8 \text{ Sy}$$

$$B_1 = 0.5, B_2 = 1.4$$

where $Z = \pi r_m^2 t$, r_m is pipe mean radius and t is the thickness of the pipe.

C. For branches and tees, functional capability can be considered assured if the following condition is met:

$$2B_1 \frac{PD_1^2}{D_2^2 - D_1^2} + B_{2b} \frac{M_p}{Z_b} + \frac{M_p}{Z_p} \le 1.8 \text{ sy}$$

where B_1 , B_{2b} , B_{2r} , Z_b and Z_r are defined in NB-3650 of the ASME Section III Code of the 1983 Edition.

D. For reducers, functional capability can be considered assured when the following requirement is met:

$$2B_1 \frac{PD_1^2}{D_0^2 - D_1^2} + B_2 \frac{M_1}{Z} \le 1.8 \text{ sy}$$

where $B_1 = 0.5$ for $a \le 30^{\circ}$ and $B_1 = 1.0$ for $a > 30^{\circ}$ $B_2 = 1.0$ and $Z = \pi r_m^2 t$

where a = cone angle of reducer, deg.

-

. .

E. For bolting of flanged joints, functional capability

can be considered assured when the Level D requirements of

ASME SEction III Code 1983 Edition (NB-3658) are met.

.*