

## UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

FEB 2 6 1985

Docket Nos. 50-352/353

Mr. Edward G. Bauer, Jr.
Vice President & General Counsel
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Dear Mr. Bauer:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - LIMERICK

As part of the Independant Design Verification Program (IDVP) conducted for Limerick Potential Finding Report 019 was identified. The staff's review of PFR-019 for purposes of the IDVP has been completed. However the staff's Mechanical Engineering Branch is continuing its review of PFR 019 with respect to design loading combinations for ASME Code Class 1, 2 and 3 piping and support systems. Apparently the jet impingement loads from all potential break locations have not been incorporated in the load combination for the faulted condition of the ASME code stress analysis. This was based upon an extension of the provisions of SRP 3.6.2 for pipe whip analysis to apply to jet impingement loading.

The staff is reviewing this issue and has the following position: Regulatory Guide 1.46, Footnote 14, NUREG 75/087 - SRP 3.6.1 - BTP APCSB 3-1 B.2.(2), and NUREG 0800-SRP 3.6.2 III.2 all clearly state that an unrestrained whipping pipe is considered capable of causing breaks in impacted pipes of smaller nominal pipe size and developing through - wall leakage cracks in impacted piping of equal or larger nominal pipe size with thinner wall thickness. Because of the differences in the nature of the loads from a whipping pipe and jet flow from a break or crack, the staff has not permitted the above guidelines for whipping pipes to be extended to jet impingement even though the equivalent static load from a jet is generally less than that from a whipping pipe.

To enable the staff to continue its review of this subject, the following information is requested:

1. Identify the piping and supports in the Limerick plant which are affected. Include system description and plant location.

## LIMERICK

Mr. Edward G. Bauer, Jr Vice President & General Counsel Philadelphia Electric Company Philadelphia, Pennsylvania 19101

Troy B. Conner, Jr., Esquire Conner and Wetterhahn 1747 Pennsylvania Ave, N.W. Washington, D. C. 20006

7ori G. Ferkin Assistant Counsel Governor's Energy Council 1625 N. Front Street Harrisburg, Pennsylvania 17105

Federic M. Wentz County Solicitor County of Montgomery Courthouse Norristown, Pennsylvania 19404

Eugene J. Bradley Philadelphia Electric Company Associate General Counsel 2301 Market Street Philadelphia, Pennsylvania 19101

Mr. Vincent Boyer Senior Vice President Nuclear Operations Philadelphia Electric Company 2301 Market Street Philadelphia, Pennsylvania 19101

Mr. Suresh Chaudhary Resident Inspector U.S. Nuclear Regulatory Commission P. O. Box 47 Sanatoga, PA 19464

James Wiggins, SR. R.I. U. S. Nuclear Regulatory Commission P. O. Box 47 Sanatoga, Pennsylvania 19464 Mr. Marvin I. Lewis 6504 Bradfurd Terrace Philadelphia, Pennsylvania 19149

Frank R. Romano, Chairman Air & Water Pollution Patrol 61 Forest Avenue Ambler, Pennsylvania 19002

Charles W. Elliott, Esquire Brose & Poswistilo, 1101 Bldg. 325 N. 10th Street Easton, Pennsylvania 18402

Ms. M. Mulligan Limerick Ecology Action 762 Queen St. Pottstown, Pennsylvania 19464

Mr. Karl Abraham Public Affairs Officer Region I U.S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, PA 19806

Thomas Gerusky, Director
Bureau of Radiation Protection
Dept. of Environmental Resources
5th Floor, Fulton Bank Bldg.
Third and Locust Streets
Harrisburg, Pennsylvania 17120

Sugarman, Denworth & Hellegers 16th Floor Center Plaza 101 North Broad Street Philadelphia, Pennsylvania 19106

Robert L. Anthony Friends of the Earth Delaware Valley 103 Vernon Lane, Box 186 Moylan , Pennsylvania 19065

Martha W. Bush
Deputy City Solicitor
Municipal Services Bldg.
15th and JFK Blvd.
Phildelphia, Pennsylvania 19107

David Wersan, Esq. Assistant Consumer Advocate Office of Consumer Advocate 1425 Strawberry Square Harrisburg, Pennsylvania 17120

Steven P. Hershey, Esq. Community Legal Services, Inc. Law Center North Central - Bevry Bldg. 3701 North Board Street Philadelphia, Pennsylvania 19140

Mr. J. T. Robb, NS-1 Philadelphia Electric Company 2301 Market Street Philadelphia, Pennylsvania 19101

Timothy R. S. Campbell, Director Department of Emergency Services 14 East Biddle Street West Chester, Pennsylvania 19380 Director, Pennsylvania Emergency
Management Agency
Basement, Transportation &
Safety Building
Harrisburg, Pennsylvania 17120

Angus Love, Esq. 107 East Main Street Norristown, Pennsylvania 19402

Helen F. Hoyt, Chairman Administrative Judge Atomic Safety & Licensing Board U.S. Nuclear Regulatory Commission Washington, D. C. 20555

Dr. Jerry Harbour Administrative Judge Atomic Safety & Licensing Board U.S. Nuclear Regulatory Commission Washington, D. C. 20555

Dr. Richard F. Cole Administrative Judge Atomic Safety & Licensing Board U.S. Nuclear Regulatory Commission Washington, D. C. 20555

Mr. Spence W. Perry, Esq.
Associate General Counsel
Federal Emergency Management Agency
Room 840
500 C St., S.W.
Washington, D. C. 20472

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 Demonstrate that safe shutdown of the Limerick plant can be accomplished when the required jet impingement loads are included in the evaluation of target piping systems.

Sincerely,

Original signed by:

A. Schwencer, Chief Licensing Branch No. 2 Division of Licensing

cc: See next page

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