



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

MAY 24 1985

Docket Nos.: 50-498
and 50-499

Mr. J. H. Goldberg
Group Vice President - Nuclear
Houston Lighting and Power Company
Post Office Box 1700
Houston, Texas 77001

Dear Mr. Goldberg:

SUBJECT: USE OF ASME CODE CASE N-411 FOR THE SOUTH TEXAS PROJECT UNITS 1
AND 2

Your letter of April 12, 1985 (Serial No. ST-HL-AE-1196) requested authorization to use ASME Code Case N-411 for application in the response spectrum seismic analysis of piping systems at the South Texas Project Units 1 and 2. The staff has reviewed your request and hereby grants it subject to the discussion which follows.

Code Case N-411, "Alternative Damping Values for Seismic Analysis of Piping, Section III, Division I, Class 1, 2 and 3 Construction" is a conditionally acceptable Code Case and is approved by the staff for specific plant applications pending revision of Regulatory Guide 1.61. Utilities wishing to use this Code Case shall submit in their request the following information or commitments:

- (a) Commit to use the case for piping systems analyzed by response spectrum methods and not those using time-history analysis methods.
- (b) Indicate if the case is to be used for new analyses or for reconciliation work and for support optimization.
- (c) Due to the increased flexibility of the system commit to check all system predicted maximum displacements for adequate clearance with adjacent structures, components and equipment, and that the mounted equipment can withstand the increased motion.
- (d) When the alternate damping criteria of this Code Case are used, they will be used in their entirety in a given analysis and shall not be a mixture of Regulatory Guide 1.61 criteria and the alternate criteria of this Code Case.

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HL&P has complied with these commitments in the letter of April 12, 1985. Therefore, since the commitments with respect to Code Case N-411 are documented in the referenced letter, the staff finds your request to use Code Case N-411 to be acceptable for use at South Texas Projects Units 1 and 2 in the response spectrum seismic analysis of piping systems. The staff also approves reflecting this change in a subsequent amendment to the FSAR, as stated in your letter.

Sincerely,

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Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing

cc: See next page

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~~Docket File 50-498/499~~

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