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Washington Public Power Supply System

P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000

May 16, 1985 GO1 85-0116

Director of Nuclear Reactor Regulation Attention: Elinor G. Adensam, Chief Licensing Branch No. 4 Division of Licensing U. S. Nuclear Regulatory Commission Washington D.C. 20555

- Subject: NUCLEAR PROJECT NO. 1 DOCKET NO. 50-460 REQUEST FOR CODE CASE N-411 APPROVAL
- Reference: Letter: G. W. Knighton to R. J. Harrison: Seismic Piping Analysis - Seabrook Station Docket Nos: 50-443 and 50-444

In accordance with Article NCA 1140 of the ASME Section III Code, the Supply System requests approval to apply Code Case N-411 as described below.

On September 17, 1984, the Main Committee of the ASME approved Code Case N-411. This Code Case provides alternate damping values for the seismic analyses of Class 1, 2 and 3 piping systems which may be used in lieu of the values given in Table N-1230-1 of Section III of the ASME Boiler and Pressure Vessel Code. The N-1230-1 values, incidentally, are the same as those given in Regulatory Guide 1.61. It is requested that the use of Code Case N-411 be approved by your office for the design of the WNP-1 plant. The N-411 damping values, which were originally recommended by the Pressure Vessel Research Committee (PVRC), would be applied in the following circumstances:

- In the piping design conformance analyses where their use would preclude the requirements for hardware modifications.
- 2. Where appropriate, in the optimization of pipe supports (redesign and new design) for seismic requirements.

Based on the use of the N-411 damping values, the piping design conformance analyses for the WNP-1 project will continue to include, but will not be limited to, verification that:

- All support locations are necessary,
- Excessive pipe deflections are not introduced when supports are optimized,

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- Postulated pipe break locations have been properly considered,
- Equipment nozzle loads have also been properly considered.

Each analysis utilizing the damping values of Code Case N-411 will be so specified on the N-5 Data Report.

The mechanism for implementing the above will be incorporated into our project procedures, and the use of the code case damping values will be documented in a future amendment to the FSAR and the piping design specification.

Please note that permission to apply Code Case N-411 damping values has already been granted to another nuclear project (see reference). As the piping conformance analyses have already been initiated, the Supply System would appreciate receiving your approval for WNP-1 to apply Code Case N-411 by June 28, 1985.

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G. C. Sorensen, Manager Regulatory Programs (340)

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