

Docket Nos.: 50-277/278

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

MAR 14 1986

Dear Mr. Bauer:

SUBJECT: USE OF ASME CODE CASES N-411 AND N-397 FOR PIPING ANALYSIS -
PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

By letter dated November 8, 1985, the Philadelphia Electric Company (PECO) requested authorization to apply ASME Nuclear Component Code Cases N-411 and N-397 to piping reanalyses for Peach Bottom Units 2 and 3. The purpose of these reanalyses is to optimize the number of snubbers used in piping systems.

These reanalyses shall be performed according to the NRC Piping Review Committee recommended methodology delineated in NUREG-1061, Vol. 5, published in April 1985. Part of the recommended methodology are contained in ASME Code Cases N-411, "Alternative Damping Values for Seismic Analysis of Piping, Section III, Division 1, Class 1, 2, and 3 Construction," and N-397, "Alternative Rules to the Spectra Broadening Procedures of N-1226.3 for Class 1, 2, and 3 Piping, Section III, Division 1."

Code Case N-411 is a conditionally acceptable Code Case. Its use is approved by the staff for specific plant applications, pending a revision of Regulatory Guide 1.61, when the following information and commitments are provided:

- 1) The application of the Code Case shall be limited to piping systems analyzed by the response spectrum method only.
- 2) The alternate damping criteria of the Code Case shall be used in their entirety in any given analysis. The mixed application of the Code Case and Regulatory Guide 1.61 is not permitted.
- 3) Due to the increased flexibility of the system, the user shall check all recalculated displacements to verify there is adequate clearance between the piping system and adjacent structures, components, and equipment, and to verify the ability of mounted equipment to withstand the increased motion.
- 4) The user shall clearly indicate whether the Code Case will be used for new analyses, for reconciliation work, or for support optimization.

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Mr. E. G. Bauer, Jr.

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Code Case N-397 is an acceptable conditionally Code Case. It has been accepted by Regulatory Guide 1.84 for application to all piping analyses using the response spectrum method.

In the referenced letter, PECO made the necessary commitments, identified above, for the application of Code Case N-411. Also, the Code Cases will be used in an acceptable application, i.e., piping stress analyses using the response spectrum method. Therefore, the staff concludes it is acceptable to use Code Cases N-411 and N-397 for the Peach Bottom Units 2 and 3 snubber optimization (reduction) program. The approved application is restricted to piping analyses for the purpose of reducing the number of snubbers. This approval does not include application of these Code Cases to equipment analyses, or to piping analyses when energy absorbers are included in the stress analysis model.

If you have any questions concerning this matter, please contact us.

Sincerely

Original signed by
Daniel R. Muller

Daniel R. Muller, Director
BWR Project Directorate #2
Division of BWR Licensing

cc: See next page

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Philadelphia Electric Company

Peach Bottom Atomic Power Station,
Units 2 and 3

cc:

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