



ARKANSAS POWER & LIGHT COMPANY

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March 28, 1986

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Mr. George W. Knighton, Director
PWR Project Directorate No. 7
Division of PWR Licensing - B
U. S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Request for NRC's Approval to Use
ASME Code Case N-411 For ANO-2

Dear Mr. Knighton:

Pursuant to the provisions of 10CFR50.55a(a)(3), the purpose of this letter is to request the NRC's approval to utilize ASME Code Case N-411, "Alternative Damping Values for Seismic Analysis of Piping," for response spectrum analyses of selected piping at Arkansas Nuclear One - Unit 2 (ANO-2).

We understand that the NRC considers Code Case N-411 a conditionally acceptable Code Case and one that may be approved on a case-by-case basis for specific plant applications. Following is a description of AP&L's planned usage of Code Case N-411 for the NRC's consideration in approving this application for ANO-2.

1. AP&L plans to utilize Code Case N-411 damping values for selected new response spectrum analyses, reconciliation and modification work, and snubber/support optimization. Damping values obtained from Figure 1 of the Code Case will be incorporated into seismic analyses for Operating Basis Earthquake (OBE) and Design Basis Earthquake (DBE) events.

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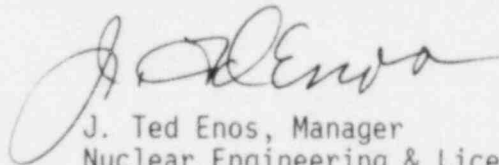
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2. AP&L plans to consider Code Case N-411 damping criteria as a valid alternative to the original ANO-2 FSAR criteria for piping analysis and related work (e.g., reconciliation and modification work, and snubber/support optimization) at ANO-2. The ANO-2 FSAR will be revised as appropriate to reflect the acceptability of the alternative use of Code Case N-411. The balance of the ANO-2 FSAR commitments relative to dynamic analysis of piping and supports will not change.
3. When performing an analysis utilizing the alternate damping criteria of Code Case N-411, it is AP&L's intention to utilize the alternate damping criteria in its entirety for a given analysis. However, for instances where N-411 curves are not available (e.g., NSSS attachments) AP&L may elect to conservatively utilize available damping values provided they are less than or equal to the N-411 values. It should be emphasized that AP&L will not mix Code Case N-411 damping criteria with that of Regulatory Guide 1.61.
4. AP&L plans to utilize Code Case N-411 damping criteria for piping systems analyzed by response spectrum methods and not for piping systems analyzed by time-history analysis methods.
5. If, as a result of utilizing Code Case N-411 criteria, ANO-2 piping supports are subsequently moved, modified or eliminated, any expected increases in piping displacements will be checked to ensure that no adverse interaction will occur with adjacent safety-related structures, components or equipment and that any mounted safety-related equipment can withstand the increased motion.

Enclosed is a check for \$150.00 as the appropriate application fee required by 10CFR170.12 for this review. We request NRC's expeditious review of this request as we anticipate using Code Case N-411 criteria for work in our upcoming ANO-2 refueling outage currently scheduled to start June 13, 1986.

Very truly yours,



J. Ted Enos, Manager
Nuclear Engineering & Licensing

JTE/DET/sg

Enclosure