UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

TEXAS UTILITIES GENERATING COMPANY, et al.

Docket Nos. 50-445-1 and 50-446-1

(Comanche Peak Steam Electric Station Station, Units 1 and 2)

CASE'S ANSWER TO APPLICANTS' STATEMENT OF MATERIAL FACTS
AS TO WHICH THERE IS NO GENUINE ISSUE REGARDING THE EFFECTS OF
GAPS ON STRUCTURAL BEHAVIOR UNDER SEISMIC LOADING CONDITIONS

in the form of

AFFIDAVIT OF CASE WITNESS MARK WALSH

1. Applicants state:

"All bolts in multiple bolt, bearing-type connections will react imposed shear loads within at most the distance of the bolt hole tolerances. (Iotti, Finneran Affidavit at 8/1/.)"

I disagree with this statement (and with some of the statements in the Affidavit). At the point all bolts begin to react the shear loads (that is, when the last bolt will have received a l lb. shear load), the first bolt that has reacted the shear load may have the shear load of 1,000 lbs., and this may have exceeded the allowable shear capacity of the bolt. This is assuming that the first bolt that reacted the shear load has not failed when the last bolt begins to resist the shear load.

^{/1/} I believe that the actual citation should be at 4-5.

One of Applicants' primary arguments which is contained in the back-up Iotti/Finneran Affidavit is regarding the definition of "oversized" bolt holes. This is addressed in detail in answer 2. following.

One example of statements with which I disagree which is made in the Affidavit of Dr. Iotti and Mr. Finneran is found on page 5 of the Affidavit (last paragraph, continuing on page 6), wherein they cite "Structural Design Guide to AISC Specifications for Buildings," by Paul F. Rice and Edward S. Hoffman (Attachment B to Affidavit).

Although the one page (268) from that document which Applicants have attached appears to be accurate /2/, their discussion and the portion cited (which is out of context) are very misleading. (See Attachment A, pages 264 through 271 of the Rice/Hoffman text.) In the portion attached by Applicants, Messrs. Rice and Hoffman are only talking about connections that receive static loads (i.e., loads that do not change direction) because the yielding stress criteria is not applicable in friction-type connections, as will be discussed later. The connections referenced by Messrs. Rice and Hoffman specifically exclude the supports that have dynamic loads (as will be shown below) such as most of those supports at CPSES. In addition, the inelastic deformation in bearing-type connections is recognized by the AISC Code at 1.5.2.2, where the allowable bearing stress is 1.35 Fy.

Therefore, the Applicants' statements are lacking reference to the

^{1/2/} It should be noted that I have not reviewed the entire text of the other reference cited by Applicants, "Plastic Design of Steel Frames," and cannot state whether or not it is taken out of context.

specific amount of inelastic deformation allowed by the AISC Code for a non-dynamically loaded structure.

On pages 265-266 of the Rice/Hoffman text, following a discussion of <u>AISC and ASTM specifications</u>, it is stated (the numbers Messrs. Rice and Hoffman have placed in parentheses refer to sections from AISC or ASTM):

"The use of ordinary (A307) bolts is limited by a number of Specification requirements. The allowable stresses are low: tension Ft = 20 ksi on the threaded area; and shear Fv - 10 ksi (1.5.2.1). The slip before full bearing is achieved on a group of ordinary bolts effectively rules out the sharing of stress in a mixed connection. Holes are to be taken as 1/16 in. larger than the nominal diameter (1.23.4), and the ordinary bolt does not expand to fill out the hole like a driven rivet nor can it be used for dependable friction. Stress sharing may not be assumed between ordinary bolts and rivets or welds (1.15.10; 1.15.11). In addition, low-strength bolts are not permitted in important field connections including . . . connections subject to vibration, impact, or stress reversal (1.15.12) . . . " (Emphases added.)

As discussed above, according to Messrs. Rice and Hoffmar (Applicants' own chosen authority), A307 bolts are not permitted in connections subject to vibration, such as those at Comanche Peak.

Applicants have admitted that the connections at Comanche Peak are subject to vibration. Applicants' witness Finneran stated, in regard to the support which Jack Doyle and I noticed that had failed during hydrotesting (Tr. 4793/15-4794/4):

"Q: (By Mr. Reynolds) Would you render an opinion on why the paint that Mr. Doyle talked about may have flaked during the flow of fluid through the pipe?

"BY WITNESS FINNERAN:

- "A. I would say that possibly vibration may have been a cause for paint coming off of the deformed area during flow of fluid during the pipe; one possible cause.
- "Q. Yes. So what you are saying is that it could have been that when the deformation was caused during construction, the paint cracked but remained on, and then when vibration occurred due to hydrostatic flow, the paint chipped off?

"BY WITNESS FINNERAN:

"A. It's a possibility. I couldn't say if that's exactly what happened." (Emphases added.)

And at Tr. 5002/24-5003/9, Mr. Finneran further testified:

"Q: (By Mr. Walsh) Is vibration a common occurrence at Comanche Peak?

"BY WITNESS FINNERAN:

"A. I think all piping systems that have fluids in them or flowing to them are possibly subject to some vibration.

"Q: How about other pipes, main steam? Will they have vibrating effects?

"BY WITNESS FINNERAN:

"A. Quite possibly there will be vibration in the main steam piping." (Emphases added.)

The ASME Code requires the Applicants to minimize vibration where it states:

"NF-3112.2 Design Mechanical Loads. . . The requirements of (a), (b), and (c) below shall apply.

". . . (c) Component supports shall be designed to minimize vibration."

In addition, according to Messrs. Rice and Hoffman (Applicants' own chosen authority), Applicants are also barred from using A307 bolts because of stress reversal.

As indicated above, Messrs. Rice and Hoffman cited the AISC code (to which the Applicants are committed through Specification MS-46A), Section 1.15.12, which states, in part:

"Field Connections

"Rivets, high strength bolts or welds snall be used for the following connections:

. . . Connections for supports of running machinery, or of other live loads which produce impact or reversal of stress.

"In all other cases field connections may be made with A307 bolts." (Emphases added.)

CASE requested, through discovery on the issue of Applicants' Motion for Summary Disposition regarding generic stiffnesses, the drawings which the Applicants used in their Motion. Of the 60 supports which the Applicants provided (I count 59, but this is immaterial to this point), 52 had reversible loads which is a reversal of stress on the supporting connection. (See Attachment B, the referenced 59 drawings.) On the drawings, the reversal of loads is shown in the block listing the loads and the direction of the load is indicated as + or - . Of the 7 supports which do not contain reversible loads (CT-1-013-006-S22S, CT-1-013-004-S32S, MS-1-001-002-C72S, MS-1-01-001-C72S. CT-1-013-002-C42S, CC-2-011-719-A53R, CT-1-013-011-S22R), 5 are spring cans and 2 are rigid-type supports. Based on this random sample, 88% of these supports require high strength bolts due to the requirement of a reversal of stress (load) /3/, according to the AISC Code (to which the Applicants are committed in design specification MS-46A).

It is also obvious from the preceding discussions that Applicants are in violation of ANSI N45.2.11, 3. DESIGN INPUT REQUIREMENTS, 3.2 Requirements, which states, in part:

"The design input requirements should include the following where applicable:

"(9) Mechanical requirements such as vibration, stress, shock and reaction forces." (Emphases added.)

^{/3/} Stress is equal to the load divided by the cross-sectional area of the item under consideration.

2. Applicants state:

"Applicants' specifications for bolt hole tolerances are 1/16" for up to 1" diameter bolts and 1/8" for 1" and greater diameter bolts. (Iotti, Finneran Affidavit at 7.)"

I agree that this appears to be Applicants' current practice (although Applicants have not provided copies of the specifications themselves with their Motion for Summary Disposition). However, I do not agree with the implication, which is obviously that Applicants' specifications are acceptable. I maintain that Applicants' practice (or specifications) is contrary to applicable codes and NRC regulations.

One of Applicants' primary arguments which is contained in the back-up Iotti/Finneran Affidavit is regarding the definition of "oversized" bolt holes. This is a crucial argument for Applicants, because according to their own statement (bottom of page 6, Iotti/Finneran Affidavit):

"The 8th Edition of the AISC Manual of Steel Construction is quite instructive on this point. At page 5-58 of the Manual, Paragraph 1.23.4.3 (Attachment C) states 'Oversized holes may be used in any or all plies of friction-type connections, but they shall not be used in bearing-type connections.'" (Emphasis added.)

Applicants claim (Affidavit, page 7) that they use <u>more stringent</u> tolerances than defined by the AISC Code (to which Applicants are committed, according to their Design Specification MS-46A). A claim the Applicants make in the Iotti/Finneran Affidavit (page 7) is:

"AISC defines 'oversized' as d+3/16" for bolts up to and including 7/8" diameter, d+1/4" for 1" bolts, and d+5/16" for bolts greater than or equal to $1 \ 1-1/8$ " (sic) diameter."

I do not agree with Applicants' representation as to AISC's definition of "oversized." A point which the Applicants <u>fail</u> to make is as shown in Attachment C to their Affidavit, AISC Table 1.23.4, "Maximum Sizes of Fastener Holes, Inches" (emphasis added) — that is, that these are the <u>maximum</u> size of holes. For a 1" diameter bolt, the <u>maximum</u> size hole for a standard hole is 1-1/16". If the hole is greater than 1-1/16" up to and including 1-1/4" for a 1" diameter bolt, the hole is considered oversized.

It is apparent that the Applicants do utilize an oversized hole for the 1" and greater bolts. As stated previously, paragraph 1.23.4.3 of Attachment C of the Applicants' affidavit (from 8th Edition, AISC Manual of Steel Construction, page 5-58), states:

"Oversized holes may be used in any or all plies of friction type connections, but they shall not be used in bearing type connections." (Emphasis added.)

It can be seen from what is shown above that bearing type connections can only be used with standard size holes. If the hole is greater than a standard size hole, bearing connections are not allowed. Therefore, the Applicants are not in compliance with the AISC Code to which they are committed (according to their design specification MS46-A).

On page 7 of Applicants' affidavit, they state:

"Thus, Applicants' specifications for bolt hole tolerances can definitely not be called 'oversized,' as that term is generally used in the construction industry."

Although the Applicants have not sized their bolt holes to the maximum allowed for an oversized condition, the bolt hole is still an

oversized hole (as discussed above). And, as the term is generally used in the construction industry, holes are considered to be oversized if they are over a standard sized hole, up to and including the <u>maximum</u> oversized hole allowed. Contrary to what Applicants state (Affidavit, page 7), they are <u>not</u> in compliance with standard industry practice.

There are several aspects of this matter of which the Board should be aware. One of the most important is whether or not Applicants even attempt to determine the size of bolt holes and, if so, how? During the 6/6/84 telephone conference call between Applicants/NRC Staff/and me, I requested documentation (original and all revisions of procedures or whatever other documentation exists) showing that QC inspectors inspect the whole tube steel base plates prior to inserting the bolt (which is the only way QC could be certain when inspecting that there were no oversize holes). (See 6/6/84 conference call Tr. 74-76.)

In Applicants' 7/15/84 letter to CASE President Juanita Ellis (received by CASE 7/16/84), Applicants' counsel stated (page 2, second full paragraph):

"Second were materials concerning Applicants' practice regarding the inspection of bolt holes in base plates, which relates to the motion concerning the effect of gaps. This information is attached. Copies of an example of the Material Identification Log, and the associated hanger drawing, for support H-BR-2-5B-001-009-3 are provided. This log is filled out by the QC inspector prior to release of materials, including base plates, from the fabrication shop. Although not separately called out on the log, one of the attributes of base plates the QC inspector examines is bolt hole size." (First emphasis in the original; second emphasis added.)

I agree with the statement of Applicants' counsel that the

inspection of base plates for bolt hole size is <u>not</u> separately called out on the Material Identification Log, and in reviewing these documents (<u>see</u> Attachment C), I see no reference to the QC inspectors' verifying the hole size.

There is additional information which indicates that QC inspectors do <u>not</u> inspect for oversize bolt holes. In the sworn affidavit of Howard J. "Robbie" Robinson (sent to the Board and parties with CASE's 11/28/83 Answer to Board's 10/25/83 Memorandum (Procedure Concerning Quality Assurance)), Mr. Robinson stated (page 7):

"My duties as general foreman over the fab shop consisted of fabricating items such as pipe hangers, cable tray hangers, and Q miscellaneous steel assemblies for subsequent installation in the field. . . I did, over a period of about three years, engage in an ongoing argument with one of the foremen within the steel hanger department whose duty was to install hangers in the field where he challenged the practice in the fab shop of drilling 1" holes in base plates to the code allowable of 1-1/16" diameter for a 1" bolt. His stand had been that we were allowed to overdrill the hole to a 1-1/8" diameter. . . he . . . made the statement to me that he had been drilling them oversize all along and intended to continue to. If he in fact did drill these holes oversize, and I believe that he did, one must assume that any subsequent QC inspection failed to identify this." (Emphases added.)

(See also discussion under answer 2. preceding.)

Further confirmation of what I believe to be the truth of this matter is to be found in a document concerning an investigation conducted by Applicants into allegations which had been made. (See Attachment D, 3/9/84 TUGCO Office Memorandum to Distribution from Jerry C. Walker, Subject: Resolution of QAI-0001, and the attached 2/22/84 TUGCO Office Memorandum from Boyce Grier to Antonio Vega, Subject: Investigation of Allegations QAI #0001.) Item 3, page 2, of the

2/22/84 Memorandum discusses allegations of an alleger that an oversize hole (1-1/2") had been drilled for a 1-1/4" Hilti bolt in a hanger base plate (i.e., a hole 1/4" larger in diameter than the bolt). Mr. Grier states that he subsequently identified the support in question as CC-2-070-002-A33R (copy of the as-built drawing for the support is Attachment F to his report). He further states:

"There is nothing in the documentation package for this pipe support to indicate a requirement for or the approval of an oversize hole. I reviewed the reports of the QC in pections for the Hilti installation for this support. These are contained in the following:

"IRMH-19682, dated 7/1/81 "IRMH-53200, dated 2/15/83 "IRMH-53257, dated 2/22/83

"These reports do not indicate any nonconforming or unsatisfactory conditions. (Blacked-out) stated during his interview that he had no knowledge of oversize holes ever being drilled for Hilti bolts.

"I made inquiry of pipe support engineering (Jay Ryan) as to whether an oversize hole for a Hilti bolt in the support in question would be of concern. I was told that it would not be a problem.

"The allegation that an oversize hole had been drilled for a Hilti bolt could neither be confirmed or dismissed. It appears that physical inspection of the holes for the support in question would be the only way to resolve this matter. In view of the response from Engineering regarding the significance of this matter, it does not appear necessary to pursue the matter further." (Emphases added.)

Thus, the investigator reviewed the documentation packages and saw no indication of an oversize hole or of a requirement for or the approval of an oversize hole. He reviewed the reports of the QC inspections, which did not include the Material Identification Log which Applicants' counsel referenced as being the documentation I

requested regarding Applicants' practice for the inspection of bolt holes in base plates. When he checked with pipe support engineering (Jay Ryan), he was told that the 1/4" oversize bolt hole would be no problem, although no basis is given in the report for Jay Ryan's disposition of the problem. Based on Jay Ryan's position, the investigator ceased his investigation — even though he admitted that he could neither confirm or dismiss the allegation.

Therefore, as demonstrated above, Applicants' statement that they have no oversize holes (including those greater than the 1/8" criteria Applicants claim to use) is without substance.

3. Applicants state:

"Test data indicate that bolts of the kind Applicants use have margins of safety for shear displacements equal to the maximum bolt hole tolerances ranging from 5.6 (1 1/4" super kwick Hilti) to 3.2 (1 1/4" Richmond Inserts). (Iotti, Finneran Affidavit at 8-9.)"

I agree with this statement, but I do not see where it is material to the Board. This statement discusses <u>displacements</u> only. For the Applicants to be in compliance with IE Bulletin 79-02 the factor of safety must be based on ultimate <u>load</u>, not <u>displacement</u>.

Using the test data shown in Attachment A to Applicants' testimony in September 1982 (Applicants' Exhibit 142D, admitted at Tr. 4794, Attachment B), for a 3/4" diameter Hilti bolt loaded in shear, the load at 1/8" displacement is 10,000 lbs. The allowable load as listed in the PSE Manual (see Attachment E, PSE Manual, Section V, Hilti Concrete Anchor Bolts, Rev. 0, 1/8/82, page 8 of 10, Figure 6) is 3,693 lbs. for

a 3/4" diameter Hilti with 9-1/4" embedment. Therefore at 1/8" displacement, the Hilti bolt has exceeded its allowable by 10,000/3,693 = 2.71.

The same philosophy can be used for the Richmond insert.

Referring to Applicants' Exhibit 142D, Attachment C, sheet labeled 5, at a displacement of .125" (1/8"), the shear load is approximately (14 + 16) /2 = 15 kips. The capacity for a 1" diameter A307 bolt is 7.85 kips. Therefore, the load in the bolt has exceeded the established allowable by 15/7.85 = 1.91.

In addition, in the design of pipe supports at CPSES, the designer assumes the support is rigid at the bolted connections and does not move, and determines the stiffness of the support or determines the deflection for the support based on this assumption (that is, that the bolted connections don't move). Now the Applicants are stating that the bolted connections by themselves will move 1/8". It would appear that the Applicants are not utilizing appropriate design assumptions. Only if the Applicants were utilizing friction type connections, would their assumptions be proper.

At this time it would be appropriate to bring to the Board's attention what I believe Applicants are up to. The Applicants, in this Motion for Summary Disposition, are addressing the consequences of gaps in bearing type connections. The Applicants have claimed to this Board on the record (for example, Tr. 5154/18-5154/15, 5161/7-25, and 5208/1-17) that they utilize bearing type connections in the design of base

plates utilizing Hilti bolts. But in response to one of Cygna's questions in regards to Hilti bolts, the Applicants informed Cygna that they are designed as <u>friction</u> type connections and will not move because they are pretorqued. <u>See</u> Attachment F (copy of the 4/19/84 letter, with relevant attachments, from L. M. Popplewell, Project Engineering Manager, TUGCO, to Ms. Nancy Williams, Project Manager, Cygna Energy Services), wherein Applicants state (bottom of page 9):

"Using our design approach, the Hilti joints, since they are pretorqued, would perform as a <u>friction joint</u> within their working loads." (Emphasis added.)

This is a complete reversal of philosophy by the Applicants, not presented to the Licensing Board before. At Tr. 5208/1-7, Dr. Chang states that the loads due to pretorquing are to set the wedges and the pretorque value used is too small to be considered sufficient as a friction-type connection.

It is apparent that the Applicants are singing a different song in their response to Cygna. There is no indication within the Phase 3 Cygna Report that Cygna investigated whether or not the Hilti bolts are torqued sufficiently to be considered as a friction-type connection.

One must consider whether or not the statement made to Cygna is true (i.e., the pretorque provided to the Hilti bolts is sufficient to consider them as friction connections). The allowable shear force assuming a safety factor of 2 can be calculated by the following formula modified from the Applicants' Motion for Summary Disposition on cinched-up U-bolts, page 14 of Affidavit, modified to accommodate the shear force requirement:

 $V = (T/K \times D)(.4)/FS$

where V = the allowable shear capacity

.4 = the coefficient of friction between concrete and steel

K = torque coefficient = .3

D = diameter of bolt (say, a 3/4" diameter)

T = the applied torque

FS = factor of safety = 2

The Brown & Root procedures shown in CASE Exhibit 669B (Attachment to Deposition/Testimony of CASE Witness Jack Doyle), sheet 10P, for a 3/4" diameter bolt has a required torque of 150 foot-lbs.

The allowable shear value is thus

1/2 ((150)(12) / (.3)(.75)) (.4) = 1,600 1bs.

The allowable listed in the PSE Manual for a 3/4" diameter Hilti bolt is 3,693 lbs. or a (3693/1600)(100) = 231% difference.

The above analysis does not include creep effects on the concrete; these effects will decrease the pretorqued value. The coefficient of friction between the nut and the Hilti bolt was assumed to be .3.

Therefore, my analysis is on the very liberal side, and the Applicants' statement to Cygna that the Hilti bolt connection is a friction connection is lacking proper consideration.

In addition, when Brown & Root tested the Hilti bolts for compliance to IE Bulletin 79-02 and compared pretorque to ultimate load, they neglected to consider an important factor. This factor is that Brown & Root did not measure the load induced into the bolt due to

pretorquing, but rather the ultimate load due to pretorquing in a tension test. To have measured the pretorqued value would have required Brown & Root to measure the displacement of the bolt due to an applied load. When the bolt first begins to displace is when the pretorqued value is determined.

4. Applicants state:

"Consideration of all bolts in multiple bolt, bearing connections, with bolt hole tolerances equivalent to those used by Applicants, to react shear loads equally is accepted industry practice and is premised on the fact that the inelastic localized deformations that could result from self-limiting stresses do not unacceptably reduce the ultimate bolt capacity. (Iotti, Finneran Affidavit at 5-7.)"

I disagree with this statement. As already discussed above, accepted industry practice does not allow bearing-type connections when the bolt hole is greater than the maximum standard sized hole. The inelastic localized deformations that the Applicants are relying on have limitations that the Applicants failed to address, as shown above; i.e., allowable bearing stresses and when bearing connections can and cannot be used. Therefore, the conclusion that the Applicants have attempted to make is not complete and violates established code allowables and industry practice.

5. Applicants state:

"The report CASE relied on (CASE Exhibit 1001) to support its contention that at most two bolts may be considered to react shear loads in multiple bolt, bearing connections addressed connections in which bolt hole tolerances from 1.33 times bolt diameter, up to 1/2" for 1" bolts, may be present.

"These conditions could result in a safety factor for shear displacement of only 1.1. (Iotti, Finneran Affidavit at 9-10)."

I disagree with the first sentence. As stated above, the inelastic deformations that occur with the Applicants' position will exceed established code allowables (i.e. allowables based on load, not displacement) with these oversized holes the Applicants use. What Dr. Fisher (referenced in the Iotti/Finneran Affidavit) was addressing was a warning to engineers and designers of the new Code provisions; i.e., an allowance for excessively oversize holes in column base plates where tensile forces are not commonly seen, and the shear force is accommodated by the compressive load of the column. With the old Code (i.e., the 7th Edition), no oversize hole was allowed with A307 bolts to resist a shear load. But the new Code not only allows the oversize hole but the hole can be larger because, as Dr. Fisher states, columns are generally not experiencing tensile loads. Therefore, Dr. Fisher provides methods to accommodate connections for columns that do not contain sufficient compressive loads.

I partially agree with the second sentence, to the extent that it is correct when one considers displacement only, and not allowable stress, for a nuclear power plant.

6. Applicants state:

"In a seismic event, only the first quarter cycle loading could cause preferentially loaded bolts to deflect in shear.

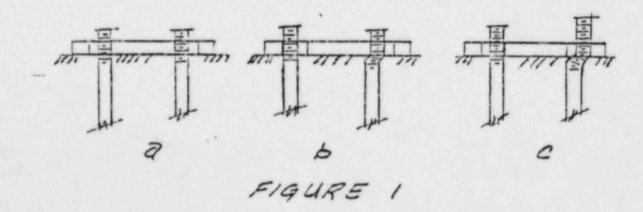
"For the remainder of the cycles the bolts will equally react the loading (Iotti, Finneran Affidavit at 13.)"

I agree with the first and second sentences; however, they are not reflective of the true extent of the problem, as discussed in the following.

The Applicants' example and position is demonstrated in Figure 1 below. At the end of the first quarter cycle loading on a two-bolt base plate, the bolt that reacts first may deform at the peak of the cycle, as shown in Figure 1b below, as the Applicants state. And as shown in Figure 1c, the bolt is permanently deformed. In addition to this, Applicants have another flaw in their presentation. They assume that the bolt is behaving in a ductile manner, under a shear load. This assumption is not consistent with the following statement from NRC Regulatory Guide 1.124 ("Service Limits and Loading Combinations for Class 1 Linear-Type Component Supports," admitted at Tr. 5901, page 1.124-2, B.1.b.):

"The increase permitted by NF-3231.1 and F-1370(a) of Section III for shear stresses or shear stress range should not be more than 1.5 times the level A service limits because of the potential for non-ductile behavior." (Emphasis added.)

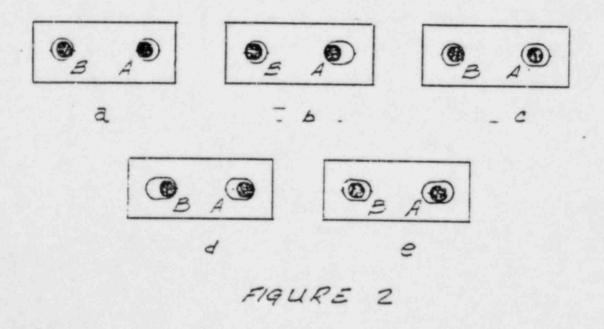
Nowhere in ASME NF are the level A service limits or the AISC Code for shear stress allowed to exceed the yield strength of the material. Therefore, the Applicants are in violation of the ASME code, as well as the AISC Code, when they allow the bolts to exceed the yield strength in shear and deform.



The above example consisted of a stiff plate and a flexible bolt.

Another condition can also occur, and that is a stiff bolt and a flexible plate, as shown in Figure 2 following.

As shown in Figure 2b, at the end of a 1/4 cycle the original circular hole for bolt A has deformed into an eliptical type of configuration. At the end of the 1/2 cycle, there is now a gap on both sides of bolt A, as shown in Figure 2c below, and there is no bearing between bolt A and the plate. At the end of the 3/4 cycle, the hole for bolt B has now deformed into an eliptical type of configuration, as shown in Figure 2d. At the end of the first full cycle, as shown in Figure 2e below, there are now two permanently elyptical-type holes with gaps twice as large as before the cyclic motion began, and neither bolt A or B is in bearing. If the original gap for a 1" diameter bolt was 1/8", the gap now is 1/4", and this would definitely be considered an oversized hole in that particular direction. This is not allowed for bearing type connections, as Applicants should agree.



The deformation discussed in example 2 is possible since the AISC Code at 1.5.2.2 allows the bearing stress of the plate to exceed the yield strength of the plate in the bearing type connection. The deformation discussed in example 1 (the condition which the Applicants cite) is possible, but would conflict with Regulatory Guide 1.124. And nowhere in the AISC Code is the bolt stress allowed to exceed the yield strength in shear.

Example 2 is realistic when one considers the A307 bolt/tube steel/Richmond insert condition. When the axial force from the tube steel member is transferring this axial load to the bolt by means of shear, the NRC Special Inspection Team (SIT) (as well as the Applicants) claimed that approximately 85% of the axial force being transferred as shear is in the flange of the tube steel member closest to the concrete. The thickness of the tube steel is at most 1/2" thick and the bolt is 1-1/2" diameter (minimum) for supports within the containment. The bolt is designed for an allowable stress value equal to 10 ksi (from Table 1.5.2.1 of the AISC Code, 7th Edition), yet the allowable bearing stress of this thin tube steel member has an allowable of 48.6 ksi for yield strength equal to 36 ksi. The allowable capacity for a 1-1/2" diameter bolt is equal to 17.67 kips. Due to the high allowable for bearing stress, the allowable force for the tube steel member is equal to 36.45 kips. This high allowable will permit deformations for the bearing type connections when cyclic loads are not a consideration. For this reason, example 2 shown above is more realistic for the supports at Comanche Peak than the Applicants' example and position. In either case, the gap is an unacceptable

condition for a dynamically loaded structure, and is not permitted under the AISC Code, Section 1.15.12 discussed in item 1, page 3, of this affidavit.

7. Applicants state:

"The effect of gaps in seismic analyses cannot be defined in absolute terms. The effect is dependent on many factors, including the nature of the excitation (magnitude and distribution of frequencies), and the size, orientation and number of gaps. (Iotti, Finneran Affidavit at 13-14.)"

As indicated on page 14 of the Applicants' Affidavit, the existence of gaps in bearing type connections is a very complicated issue by the fact that non-linearities introduce additional impact loadings, as well as impact damping, and as the Applicants stated: "Clearly, consideration of such effects would require complex analyses which depart from accepted practices." (Page 14 of Affidavit.) Not only do I agree with this statement, but the AISC Code has recognized the complexity of the gap in bearing type connections due to cyclic loads. Paragraph 1.15.12 Field Connections requires high strength bolts for supports which produce impact or reversal of stress, as discussed above in Answer 1, page 3 of this Affidavit.

Therefore, the complexity to which the Applicants refer is their own doing. The Applicants <u>decided</u> to use bearing type connections with low strength bolts, and consequently are now attempting to justify their erroneous decision. The Applicants have resorted to crying on the Board's shoulder about how complex it would be if they were required to analyze the supports as they now exist.

8. Applicants state:

"Impact damping also occurs in seismic events where gaps are present.

"To account for this damping, however, would require consideration of effects that require complex analyses which depart from accepted design practices. (Iotti, Finneran Affidavit at 14.)"

I agree with the first sentence.

I agree with the second sentence, as discussed above in answer 7. However, I disagree with their back-up statement on page 14 of the Iotti/Finneran Affidavit, that the impact damping values would be greater than those specified by Regulatory Guide 1.61, for the following reasons: If the Applicants' position is that a higher damping value would be allowed for bearing type connections, it is obvious that Regulatory Guide 1.61 does not allow bearing type connections for cyclic loads, or it would have been listed as a specific item, with a higher damping value. But since bearing-type connections are not common industry practice for seismically qualified supports, Regulatory Guide 1.61 did not list it. Therefore, the Applicants' conclusion that a higher damping value should be allowed due to the bearing type connection would conflict with Regulatory Guide 1.61, as well as the AISC Code (to which Applicants are committed.)

9. Applicants state:

"Material damping will take place as the gap is transversed without a corresponding feed of energy from the seismic event.

"This is a beneficial effect for the seismic response of the system. (Iotti, Finneran Affidavit at 14-15.)"

I agree with the first sentence, as far as it goes, and if one is not concerned with the inelastic behavior and unpredictable behavior of the connection.

I disagree with the second sentence, because you lose the ability to predict the response of the system; you do not know where supports will be moving due to the bearing type connection; you do not know which supports will have the inelastic deformations of the bolts.

10. Applicants state:

"Each of the factors discussed in Findings 7-9 cannot be accounted for in the typical linear response spectrum analyses, as are used at Comanche Peak. (Iotti, Finneran Affidavit at 15.)"

I agree with this sentence, but that does not necessarily mean that the Applicants' position is a correct one. To begin with, IE Bulletin 79-02 required the Applicants to perform tests on expansion anchor bolts. The Applicants neglected to measure the amount of displacement that occurs at the allowable shear value. This is the Applicants' own negligence.

Another important factor which the Applicants were negligent on is the use of the Richmond insert/A307 bolt/tube steel connection. 10 CFR 50.34(a)(2) states:

"50.34 Contents of applications; technical information

- "(a) Preliminary safety analysis report. Each application for a construction permit shall include a preliminary safety analysis report. The minimum information to be included shall consist of the following: . . .
 - "(2) A summary description and discussion of the facility, with special attention to design and operating characteristics, unusual or novel design features, and principal safety considerations." (Emphasis added.)

This Richmond insert/A307 bolt/tube steel connection is not mentioned in the Applicants PSAR, although it is unusual and novel, as I have stated and the Applicants' own witnesses have admitted. (See Walsh, Tr. 3145/6-3146/8; Krishnan, Finneran, Scheppele, Reedy, and Chang, Tr. 5061/18-5065/8.)

In addition, during the 7/3/84 meeting in Bethesda between the NRC Staff and Cygna Energy Services regarding the Cygna Phases 1 and 2 Independent Assessment Program, during a discussion between the Staff's Mr. Terao and Cygna's Ms. Williams, Mr. Terao also indicates that he recognizes that this is an unusual and novel design and points out the importance of the design organization's (such as Gibbs & Hili) having followed ANSI N45.2.11, Section 6.2, which states:

"The extent of the design verification required is a function of the importance of the safety of the item under construction, the complexity of the design, the degree of standardization, the state of the art, and the similarity with previously proven designs."

Mr. Terao discusses examples of an unconventional design, then states (7/3/84 Meeting Tr. 57):

"I don't really see that there's a problem with Richmond inserts, just like there is no problem with the modeling of dual function restraints, in other words, just the Richmond inserts alone, taken by themselves, there's no problem.

"But it has to do with the design considerations that go along with it. And one of design considerations is the use of the tube steel with the holes in it as anchorage for the Richmond insert."

(See full discussion, 7/3/84 Staff/Cygna meeting Tr. 50-57.)

11. Applicants state:

"Each of the factors discussed in Findings 7-9 can only be accounted for with difficulty by performing nonlinear time history analyses. (Iotti, Finneran Affidavit at 15.)"

I agree with this statement. Based upon this statement by itself, it would seem reasonable that the Board require the Applicants to either perform the non-linear time-history analysis which they reference above or utilize a friction-type connection in the supports that are already constructed. But, as discussed in answer 12. below, the utilization of a friction-type connection would validate the assumptions the designers used in their original analysis.

12. Applicants state:

"Identifying the effects of gaps by comparison of the results of nonlinear time history (with gaps) and response spectrum (without gaps) analyses is difficult and one may not discern whether particular results are attributable to differences in individual variables or assumptions or the analytical techniques themselves. (Iotti, Finneran Affidavit at 15-16.)"

I agree with this statement. From what the Applicants have just stated, it would appear that they must be required to install at all supporting connections a friction-type connection to validate their original assumptions, and to have them fabricated as friction-type connections. The Applicants may, in the future, state that their being required to redesign their supports for friction-type connections would be costly (in the hopes that the Board will give them yet a third chance), but as stated above in the previous answers, the Applicants should have done it right to begin with.

13. Applicants state:

"Comparison of the results obtained by response spectra analyses and nonlinear time history analyses which simulate actual gaps in systems show that

- "a) the seismic response spectrum method, which ignores the nonlinearities, is more conservative than the non-linear time domain method (which includes gaps), and
- "b) the effect of gaps on reduction of response frequency is negligible due to the transient nature of the seismic acceleration loading."

"(Iotti, Finneran Affidavit at 16-17.)"

I disagree with Applicants' statements, because if what Applicants state were true, the AISC Code would allow bearing type connections in dynamically loaded structures and supports — it does not. If the Applicants wish to use the nonlinear time domain method (which includes gaps) to be less conservative than the response spectra method, that would be their option; but as stated above in answer 12, this is not realizatic.

In summary, I believe that the Applicants did not properly consider the effects of gaps in the initial or final (i.e., vendor certified) design of pipe supports. The AISC Code does not allow bearing type connections in supports where there is a cyclic type load. The Applicants, on the majority of their supports, have cyclic type loads. They utilize bearing type connections and are therefore in conflict with the AISC Code (to which they are committed). The Applicants rely on references to inelastic deformations to justify their position but omit the consideration of full cyclic loads in the inelastic deformation discussions. They depend on damping factors that are not recognized by the NRC in Regulatory Guide 1.61 for a

justification, after the fact, of their negligence. Because of these gaps, the Applicants are not able to predict how these systems will react to imposed loadings.

If they planned to use this unusual and unique design, Applicants should have initially included it in their PSAR — they did not. They freely admit that it would be difficult to properly analyze the asbuilt condition of the supports as they now exist. And finally, Applicants state that the gaps that do exist at Comanche Peak in pipe supports (which I believe are in violation of the AISC Code) are more conservative than the Code requires the Applicant to comply with. In essence, Applicants are trying to convince the Board that not complying with the AISC Code is conservative. I do not agree.

Attachments:

- Attachment A -- "Structural Design Guide to AISC Specifications for Buildings," by Paul F. Rice and Edward S. Hoffman, pages 264 through 271 -- (see answer 1, page 2)
- Attachment B -- 59 drawings (received on discovery re: Applicants' Motion for Summary Disposition regarding generic stiffnesses), demonstrating reversible loads -- (see answer 1, page 5)
- Attachment C -- Copies of an example of the Material Identification Log and associated hanger drawing for support H-BR-2-5B-001-009-3, regarding Applicants' practice re: inspection of bolt holes in base plates -- (see answer 2, pages 8-9)
- Attachment D -- 3/9/84 TUGCO Office Memorandum to Distribution from Jerry C. Walker, Subject: Resolution of QAI-0001, and attached 2/22/84 TUGCO Office Memorandum from Boyce Grier to Antonio Vega, Subject: Investigation of Allegations QAI #0001, regarding allegations of oversize bolt hole -- (see answer 2, pages 9-10)
- Attachment E -- PSE Manual, Section V, Hilti Concrete Anchor Bolts, Rev. 0, 1/8/82, page 8 of 10, Figure 6, re: allowable load for Hilti bolt -- (see answer 3, pages 11-12)
- Attachment F -- 4/19/84 letter with relevant attachments, from L. M. Popplewell, Project Engineering Manager, TUGCO, to Ms. Nancy Williams, Project Manager, Cygna Energy Services, advising Cygna that Hilti joints perform as a friction joint -- (see answer 3, page 13)

The preceding CASE's Answer to Applicants' Statement of Material Facts

As To Which There Is No Genuine Issue was prepared under the personal

direction of the undersigned, CASE Witness Mark Walsh. I can be contacted

through CASE President, Mrs. Juanita Ellis, 1426 S. Polk, Dallas, Texas

75224, 214/946-9446.

My qualifications and background are already a part of the record in these proceedings. (See CASE Exhibit 841, Revision to Resume of Mark Walsh, accepted into evidence at Tr. 7278; see also Board's 12/28/83 Memorandum and Order (Quality Assurance for Design), pages 14-16.)

I have read the statements therein, and they are true and correct to the best of my knowledge and belief. I do not consider that Applicants have, in their Motion for Summary Disposition, adequately responded to the issues raised by CASE Witness Jack Doyle and me; however, I have attempted to comply with the Licensing Board's directive to answer only the specific statements made by Applicants.

Mark Wash

DOCKETED

'84 AGO 15 PI2:15

Structural Design Guide to AISC Specifications for Buildings

Paul F. Rice Edward S. Hoffman



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CONNECTIONS

General

The latest AISC Specifications permit a wide variety of connections. The basic requirement, appropriate with the sophisticated combinations of different types of steel to be connected, different design requirements of connections, and different means of connections, is a performance requirement consistent with the overall development of the Specifications. This requirement states simply "... that the design of connections be consistent with the assumptions as to the type of construction..." (1.2). Each of the detailed requirements for the design of connections simply builds upon this basic requirement. By implicitly or explicitly requiring that the design of a particular type of connection be consistent with the design assumptions as to the type and amount of force to be transmitted, and rotation capacity (or rigidity) consistent with the rotation assumed necessary to develop the connection forces, the basic performance requirement is completed (1.2).

The Specifications explicitly recognize inelastic behavior in connections of members designed as elastic: "virtually unchanged" angles at the joints in rigid frames, "non-elastic" deformation of parts of connections in Type 2 and 3 construction, and "inelastic rotation" for wind connections with Type 2 construction (1.2). Elastic behavior in the connections of members under plastic design is implicitly recognized (2.1).

Scope

For the purposes of this Chapter, connections are most conveniently considered as classified on two bases; (1) materials used (rivets, bolts, pins, or welds), and (2) the assumed behavior of the connection (design requirements: rigid, semi-rigid, or plastic for moment; shear transmission only; tensile or compressive force only; or combinations). In addition to forming joints between two or more steel members or parts of members, connections are required to elements composed of other structural materials. For composite action with concrete elements not bonded by encasement, shear connections are required (1.11.1). Shear connections may utilize specially designed shear connectors or standard welded stud connectors (1.11.4; 1.4.6). For connection of steel column bases to transmit any direct tension or shear, anchor bolts are required (1.22).

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It is not intended in this chapter to duplicate the design aids, detail data, and examples in the AISC Handbook, Part 4, Connections. Equally, space limitations do not permit presentation of a wide range of examples to illustrate even the recently published research in this area. (See "Selected References".) Rather, the purpose here is limited to explanations and illustrations of all applicable Specification requirements that might be overlooked or troublesome in routine work. This aim will include indication of reasonable interpretations to resolve apparent conflicts or ambiguities in the Specifications, and extension of such interpretations where the Specifications seem to have omissions. It has been desirable to extend this aim somewhat in that design aids for bearing plate and base plate connections were included as well as an extension of concrete bearing connection design to cover an apparent gap between the AISC Specifications and the ACI Building Code. During the interim between preparation and publication, AISC specifications were revised to agree with the latest ACI Building Code.

Rivets, Pins, and Bolts

Rivets and Pins. The requirements for the use of rivets and pins were established many years ago and were in many AISC Specifications. Since most of the late research has been directed toward welded, and more recently high-strength bolted connections, there has been little change in the Specifications for the use of rivets. Familiarity with the requirements for, and a sharply reduced use of, rivets in building construction results in little need for interpretations of these Specifications. Rivets of Grades 1 and 2 are available under ASTM A502 (1.4.3). Allowable stresses (for tension and bearing only) are given in Table 1.5.2.1 (1.5.2.1). Net sections for tension members must be used (1.14.2); computed as prescribed (1.14.3); and allowance of $\frac{1}{16}$ in. made plus the nominal diameter of the rivet holes (1.14.5).

The use of pin connections, originally popular in truss construction, has declined in modern steel building, and is usually encountered only for very special situations requiring special design. The general requirements for the use of pins are brief and essentially unchanged from previous Specifications (1.14.6).

Perhaps the most used application of these Specification requirements today will be in alterations or additions to existing buildings in which rivets or pins were used. For new construction, bearing-type connections can not be assumed to share stress with welds (1.15.10). If used in combination, the welds must be designed for the entire stress. In strengthening existing construction, bearing connections can be assumed to carry the inplace loads, and the new welds designed only for the additional stress (1.15.10).

Bolts. Bolts may be classified by strength as (1) low, A307, for $F_t = 20$ ksi; and (2) high, A325, for $F_t = 40$ ksi, and A490, for $F_t = 54$ ksi...(1.5.2.1). The ordinary low strength (A307) bolts are usable only in bearing connections (1.5.2.2). The high strength bolts may be designed for either bearing or friction connections (1.5.2.1).

The use of ordinary (A307) bolts is limited by a number of Specification requirements. The allowable stresses are low: tension $F_t = 20$ ksi on the threaded area; and shear $F_v = 10$ ksi (1.5.2.1). The slip before full bearing is achieved on a group of ordinary bolts effectively rules out the sharing of stress in a mixed connection. Holes are to be taken as $\frac{1}{16}$ in larger than the nominal diameter (1.23.4), and the ordinary bolt does not expand to fill out the hole like a driven rivet nor can it be used for dependable friction. Stress sharing may not be assumed between ordinary bolts and rivets or welds (1.15.10; 1.15.11). In addition, low-strength bolts are not permitted in important field connections including column splices in all buildings with $H \ge 200$ ft., and where width/height < 0.25; also where width/height < 0.40, for $H \ge 100$ ft.; beam-column or column-bracing connections

where H > 125 ft.; frames carrying cranes with more than five-ton capacity; and connections subject to vibration, impact, or stress reversal (1.15.12); nor for flange-to-web nor cover plate-to-flange connections of built-up girders (1.10.4).

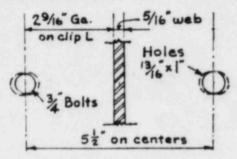
High strength bolts (1.16.1) and welds are considered essentially equivalent as connections, and, for friction-type joints assembled prior to the welding, the high-strength bolts may be assumed to share stress with welds in a mixed connection (1.15.10) or with rivets (1.15.11). Gross sections may be used for the design of compression members (1.14.2), and for the flanges of both built-up and rolled-shape girders provided the area of holes is equal to or less than fifteen percent of gross flange area (1.10.1). For tension members net section area is the basis of design (1.14.2). In friction-type joints resisting direct tension, the shear stress permitted with his strength bolts must be reduced (1.6.3).

Slotted Holes for Bolted Shear Connections. The use of short-slotted holes is permitted under 1974 AISC Specification for "Structural Joints Using ASTM A-325 or A-490 Bolts," Section 3, subject to the approval of the designer. They can be used in either friction-type or bearing-type connections, provided a washer is installed over the hole.

The normal hole size for a $\frac{3}{4}$ " ϕ bolt is $\frac{13}{16}$ ", whereas a short-slotted hole is $\frac{13}{16}$ " deep by 1" long (or $\frac{3}{16}$ " longer in the horizontal dimension). While the Specifications state that the hole can be either vertical or horizontal, the authors suggest only the horizontal slotted method be used. End clip holes only would be slotted, not the holes in the connection beam or column. See sketch, a full scale view of the end clip holes and bolt relationship for a typical $\frac{5}{16}$ " thick web.

The advantages to this system are many, several of which are:

- Greater erection speed with less field burning of misaligned holes.
- The use of one size clip angle with a set gauge will accommodate web thickness from ³/₁₆" to ⁹/₁₆".
- The reduction in sizes of clips to fabricate and stock should help reduce costs.
- The speed of erection (and elimination of mill web thickness tolerance problems) should help reduce cost.



Short-slotted holes layout for clip & - shear connection

Welds

General. Full penetration groove-welds can be designed for full development, same stress as the base metal (1.5.2.1), by selection of the specified matching electrode and welding process (1.17.2). For all fillet, plug, and slot welds, and partial penetration groove-welds, reduced permissible stresses upon the effective throat area (1.14.7) are specified (1.5.2.1). In no case may the stresses exceed that for the base metal, or if different, the weaker base metal (1.5.2.1).

Special Considerations. A number of minor special considerations arise in the specification of welding. Generally, net sections are not a consideration except for plug and slot welds in which the gross area of the holes is deducted to check the fifteen percent maximum allowed (1.10.1; 1.14.3). The Specifications require preheating for various conditions, including all work when the temperatures are below 32°F (1.23.6). Except for single- and double-angle or similar minor members, welds are to be laid out to avoid eccentric axial force or such eccentricity must be considered in the design of the connection

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As previously noted, will quired as a mixed connerequired prior to the weld also important, though no generated in the operation strained, leave correspond local inelastic yielding, be warping and lamellar tear caution of a specified sequavoid warping. Even after to retain adverse residual pected, stress relief by he service is not provided un

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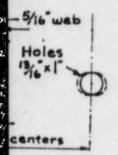
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and the member connected (1.15.3). For the usual state connection requiring flexibility to accommodate the necessary simple-end rotations assumed, the locations of the welds and the selection of the connection elements must be coordinated (1.15.4).

As previously noted, where welding at high-strength bolted friction-type joints is required as a mixed connection with shared stress, the final tightening of the bolts is required prior to the welding. The sequence of completing purely welded connections is also important, though not explicitly covered by the Specifications (1.23.6). The heat generated in the operations of welding creates intense shrinkage strains which, if restrained, leave corresponding residual stresses (1.23.6). These stresses can be relieved by local inelastic yielding, but where local inelastic yielding is also restrained or limited, warping and lamellar tearing may result. For many welded assemblies, the simple precaution of a specified sequence of welding may be employed to balance the strains and to avoid warping. Even after this precaution, certain complex assemblies may be expected to retain adverse residual stresses. For cases where this condition is anticipated or suspected, stress relief by heating must be specified by the Engineer (1.23.6). (Note: this service is not provided unless it has been specified and will normally be an added cost.)

The use of a proper sequence to avoid creation of shrinkage stresses or to minimize same can also be specified in many connections where lamellar tearing might occur. Particularly with thicker sections, where both the direction of the shrinkage is completely restrained and the resulting stress is normal to the surface of the section, consideration should be given to the welding sequence. If the condition can not be eliminated by a practicable sequence as a first choice for a solution, it may be possible to relieve the strains without developing large stresses by use of soft wire "cushions" or by revision of the entire connection detail. At least for simple cases it should, of course, be more economical to specify a particular welding sequence. (See Examples this chapter.)

Connection Design

Classification. In addition to the general requirements previously cited for the design of connections, certain arbitrary minimum design requirements for connections have been established. All connections for members carrying calculated stress must be "designed to support not less than six kips" (except lacing, sag bars, and girts), presumably six kips shear in flexural members, six kips tension in ties, and six kips bearing in compression members, all at allowable stress levels (1.15.1). Eccentric connections of axially loaded members are to be designed to transmit the resulting moments as well as the axial force (1.15.2). These minimum requirements naturally become most significant in the design of light members such as axially loaded members in trusses. Connections for such members are required to meet an additional requirement that they transmit the design load or the minimum six kips, whichever is larger, and develop at least half of the effective strength of the member (1.15.7). Note: joists are regarded as a special very limited-size truss in which the minimum connection capacity is simply specified as twice the design load for open web steel joists (4.5); or for the longspan and deep longspan joists, as the design stress or half the allowable strength of the member (103.5b). (See Chapter 4: Joists: Examples.)

As noted previously, connection types may be classified on the basis of the connection method or the design function. Broadly, connections may be described as *flexible* (for the transmission of shear only, 1.15.4), or *rigid* (maintaining the angle between the members connected and transmitting full moment capacity of the most flexible element at the

^{*&}quot;Commentary on Highly Restrained Welded Connections," Engineering Journal, AISC, 10, No. 3, 1973.

joint as well as the shear, 1.15.5), or semi-rigid (transmitting a pre-determined fraction of the full moment capacity as a rigid joint and further loads in shear as a flexible joint with corresponding angle change to supply rotation for the additional loads, 1.15.5; 1.2).

Flexible Connections. "Flexible" connections are designed to transmit shear without exceeding allowable unit stresses on the connectors as a group or the connection as a whole. The use of an average capacity for each of several connector elements sharing the total load is justified by allowing self-limiting localized stresses determined by an elastic joint analysis to exceed the yield point and create inelastic localized deformations of the connector materials, or by inelastic deformations of the connection elements (1.15.4). The simplest examples of localized deformation occur in the assembly of bearing-type bolted connections where the cumulative tolerances permitted exist on (1) out-of-round in the bolts, (2) oversize holes $(\frac{1}{16})$, and (3) center-to-center location of the holes in the different elements connected. The extreme degree of such inelastic action occurs with a two-bolt bearing-type connection where one bolt is loosely fitted and one is very tight. Until the material of the connected element surrounding the loaded bolt or the bolt yields and deforms $(+\frac{1}{16})$, the load is not shared and a 50 percent adjustment will be developed as the load increases. For larger (and thus more important) members, more bolts or rivets will be required and the degree of adjustment required on each will be less. Lesser adjustments are required for a long line of bolts or rivets intended to share stress equally. Even if perfectly fitted, yielding and inelastic deformations occur, maximum at and beginning at the first loaded bolt or rivet, and decreasing to a minimum at the last. (See Figs. 5-1

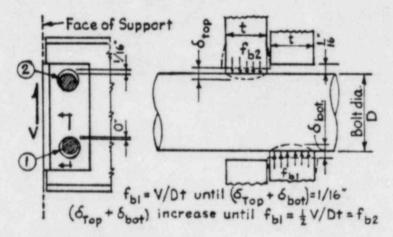


FIG. 5-1 Self-Limiting, Localized Deformations-Two Bolts.

and 5-2.) After this localized inelastic adjustment in the connectors for shear transmission, consider the inelastic adjustments that occur to reduce the "elastic theory" moments.

Inelastic deformation in the connection elements, typically angles, will occur and reduce the restraint which would transmit moment. The common double-angle shear bearing connection is extremely stiff longitudinally for the transmission of shear, and it depends upon the minor inelastic bearing deformations around each fastener to equalize the shear stresses in the fasteners. The same double-angle member is relatively flexible and will twist to permit a relatively large angular rotation reducing moment transmission. (See Fig. 5-3.)

Experience and tests confirm the practical assumptions of shear transfer only and the



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FIG. 5-2 Self-Lir



FIG. 5-3 Self-Limi: Angles.

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Bolts.

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Inelastic deformations occur successively in the plates at each fastener and in the fasteners, beginning and largest at the first loaded, and continuing until the elastic strains in the spaces s, . so, so, and su become proportional to equal stress in all fasteners.

FIG. 5-2 Self-Limiting Deformations-Axial Stress on Line of Separate Fasteners.

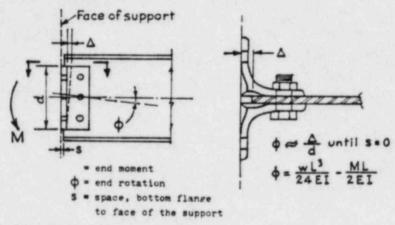


FIG. 5-3 Self-Limiting Deformation (Twist) in the Connection Elements (_|L) Two Angles.

use of an average shear stress per unit weld or separate fastener. The actual rotations observed in one series range from 0.84 to 0.97 times Φ_0 , the "simple beam rotation." These limits corresponding to moments ranging from three to sixteen percent were approximately the same for a single end plate connector or the common double-angle connector.1 Figure 5-4 presents the usual device for an approximate analysis. An additional caution reported from these tests is that the moment stiffness increases abruptly when the space "s" (see Fig. 5-3) closes and the lower flange transmits compression to the face of the support. Coping the bottom flange where a quick analysis of the proportions of depth and required angle change show the usual clearance to be inadequate may be desirable for deep connections.

For Type 2 construction (flexible connections) all the reactions should be shown on the design drawings; alternatively, only those exceeding one half the tabulated uniform load capacity for the sections used, together with a general note that connections shall be designed for one half the capacity unless otherwise noted, should be shown.

^{1&}quot;Moment-Rotation Characteristics of Shear Connections," Kennedy, October, 1969, 6, No. 4, Engineering Journal, AISC.

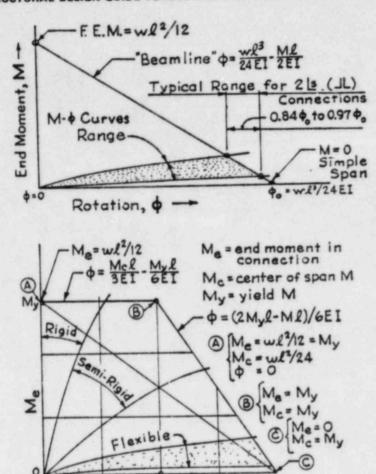


FIG 5-4 Uniformly Loaded Elastic Beam Line-Rotations at Connection.

Line A B: Me = My

Line BC: Ma=My

Rigid Connections (Type I Construction). The AISC Specifications requirement is quite realistic: that rigid connections hold the original angles "virtually" unchanged (1.2). This requirement in elastic design is usually satisfied by connections designed to develop the full section of the flexural member or the full moment at yielding of the more flexible member connected. It will be noted from Fig. 5-4 that the rigid frame analysis ($\Phi = 0$ at the allowable stress) may be satisfied by such a connection which would have a very small rotation at 0.66 to $0.60F_y$, but would be capable of a significant rotation at yielding of the flexural member (line A-B).

A diagram similar to Fig. 5-4 but with point A representing an end moment, $M_e = M_p$, and point C, a center span moment, $M_e = M_p$, can be prepared for plastic design. Connections capable of achieving full collapse load (hinges at both ends and center of span) would be required to reach $\Phi = 0.5 \Phi_0$, point B. The simpler concept of "plastic redesign," where only end hinges are required to form at the factored load, would require connections with a somewhat less rotation capacity, along line A-B. See Fig. 5-5.

Semi-Rigid Connections (Type 3 Construction). (See Fig. 5-4.) Ideally, the semi-rigid connections for Type 3 construction will behave elastically between the $\Phi = 0$ ordinate

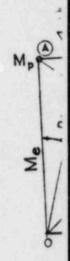


FIG. 5

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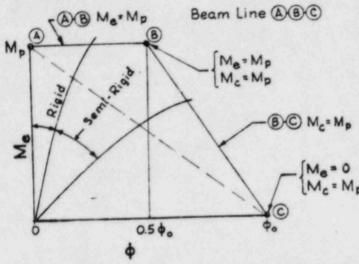


FIG. 5-5 Uniformly Loaded Plastic or Rotations at Connection.

and the "rigid" connection up to a predetermined end moment. Upon reaching this predetermined end moment (M_y) for the connection, a rotation capacity sufficient to develop the yield moment at the center of the span, $M_c = M_y$, should be available. In practical cases where the nearest available rolled section will be above the design capacity required, the excess capacity will be provided at the midspan. As in plastic redesign, end hinges only will form at the full design load. Since these hinges are designed for $M_e = M_y$, more rotation capacity is required (to cross line B-C).

Masonry Bearing Connections

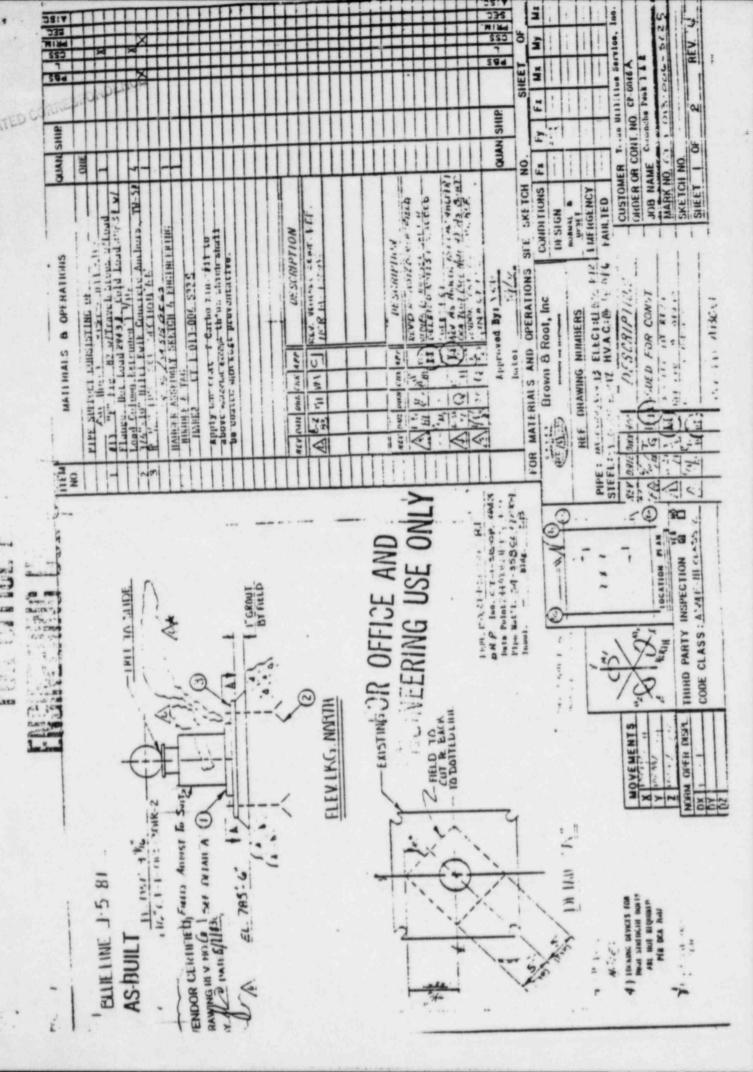
General. The AISC Specifications provide very conservative allowable stresses for bearing on masonry and concrete which apply in the absence of Code (statutory Building Code) regulations (1.5.5). For all masonry laid up in mortar, most statutory codes also provide low allowable stresses. Usually, codes distinguish among solid masonry units, bricks or block, and hollow units as well as among different classes of mortar and masonry materials. Values so prescribed range in general from 50 psi to 400 psi. The AISC Specification is therefore seldom applicable since it includes only stone masonry, $F_p = 0.400$ ksi, and brick laid in "cement" mortar, $F_p = 0.250$ ksi (1.5.5). The authors recommend use of the masonry bearing values prescribed in local Codes or those recommended by national associations dealing with masonry products. For bearing stresses on concrete, the AISC Specifications, $F_p = 0.35f_c$ on the full area and $F_p = 0.35f_c \sqrt{A_2/A_1} \le 0.70f_c$ on fractions of the area, utilize recent ACI Building Code (ACI 318-71) refinements for economy.** The ACI Building Code is of course usually applicable under local statutory codes. For beam-bearing plates and column base plates on concrete, the authors recommend the use of bearing values prescribed by the ACI Building Code.

Beam Bearing Plates. The approved design (Chapter 2, pp. 82-83, AISC Handbook) for beam bearing plates is the formula:

$$t = \sqrt{3} f_p(n)^2 / F_b$$

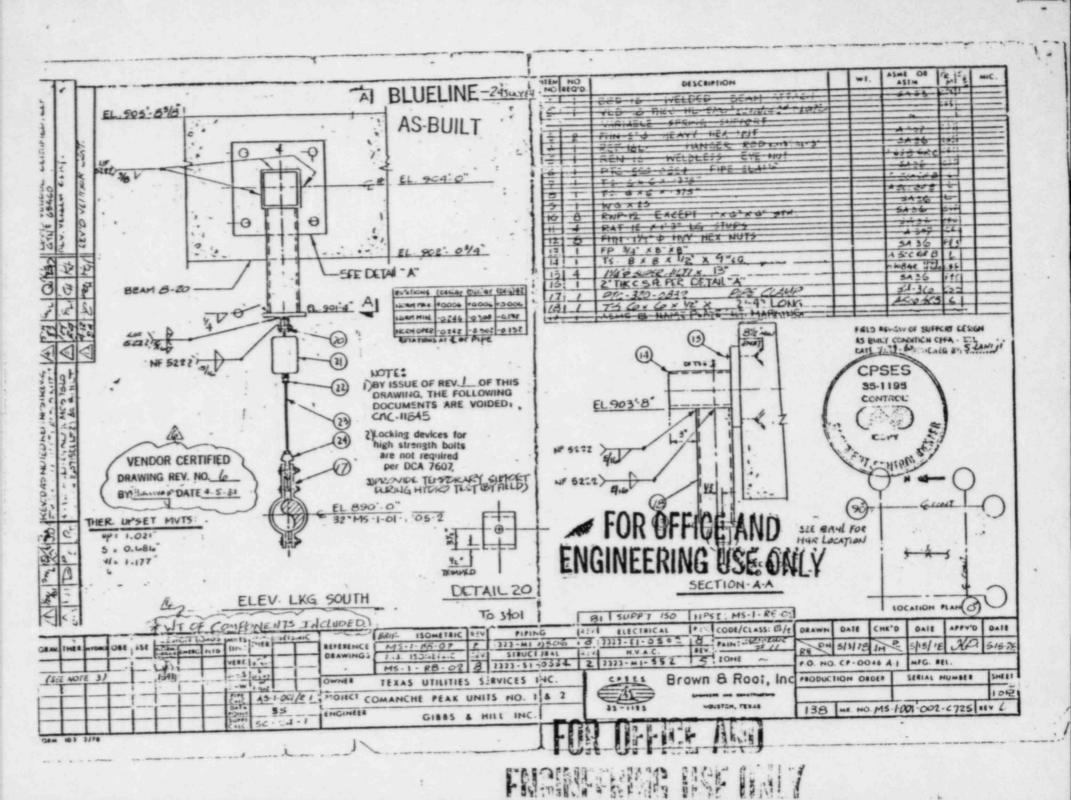
(Continued on page 274)

^{*}All mortars utilize cementitious materials and the term "cement" can be quite properly applied to all.
**Supplement No. 3, 1974.

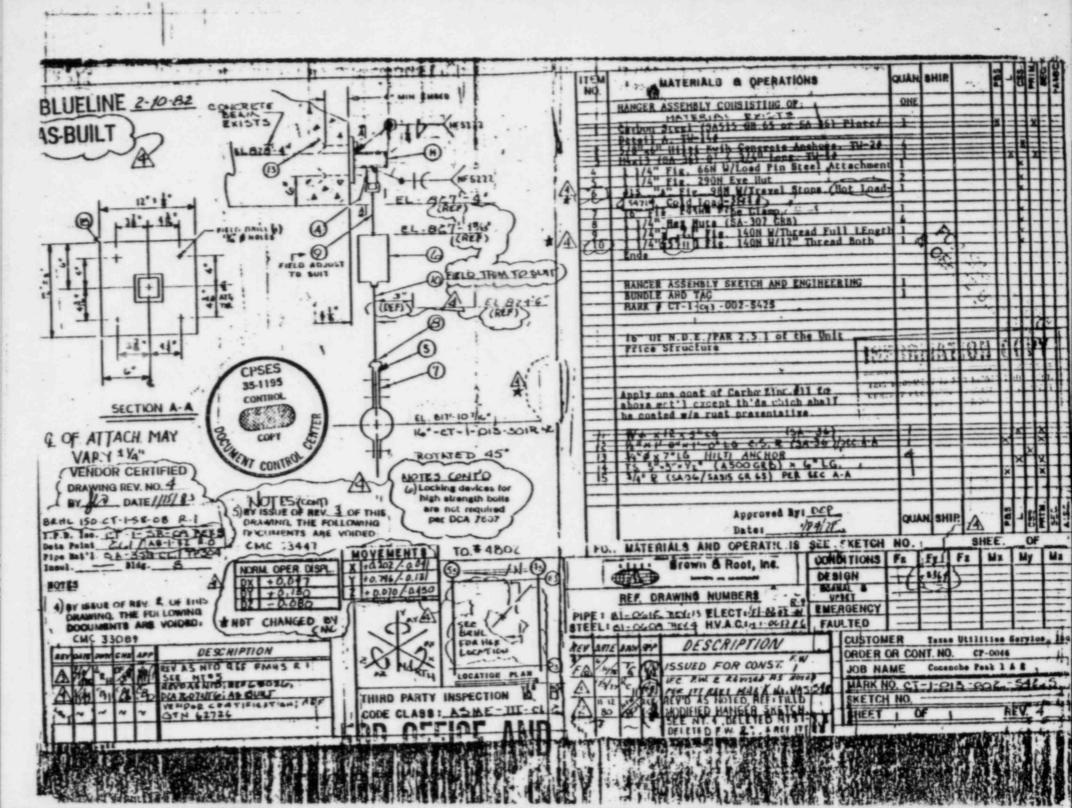


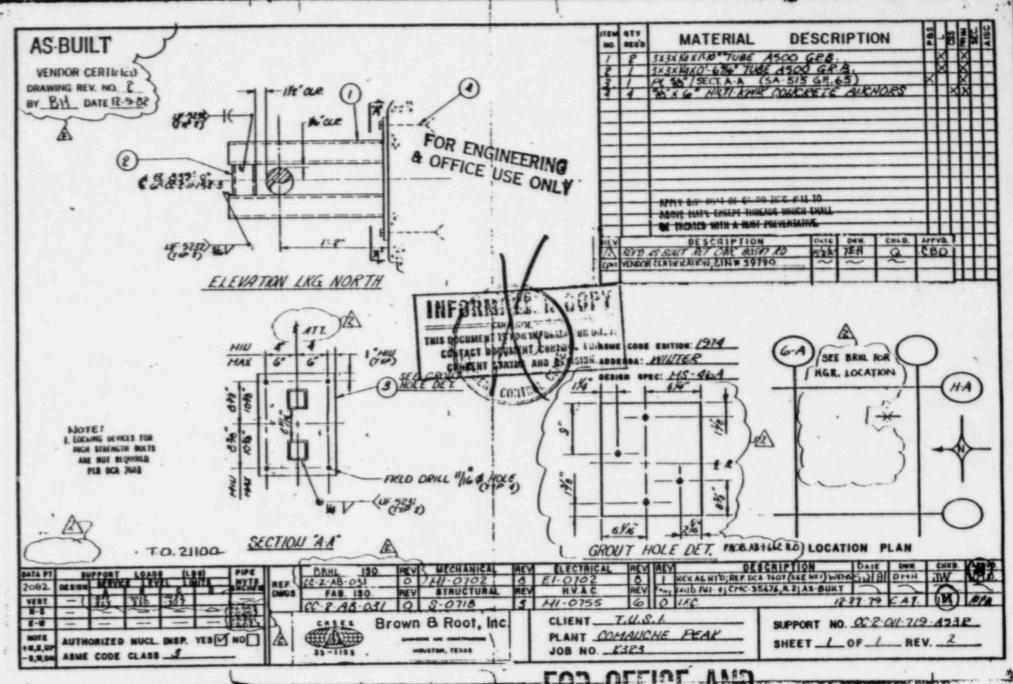
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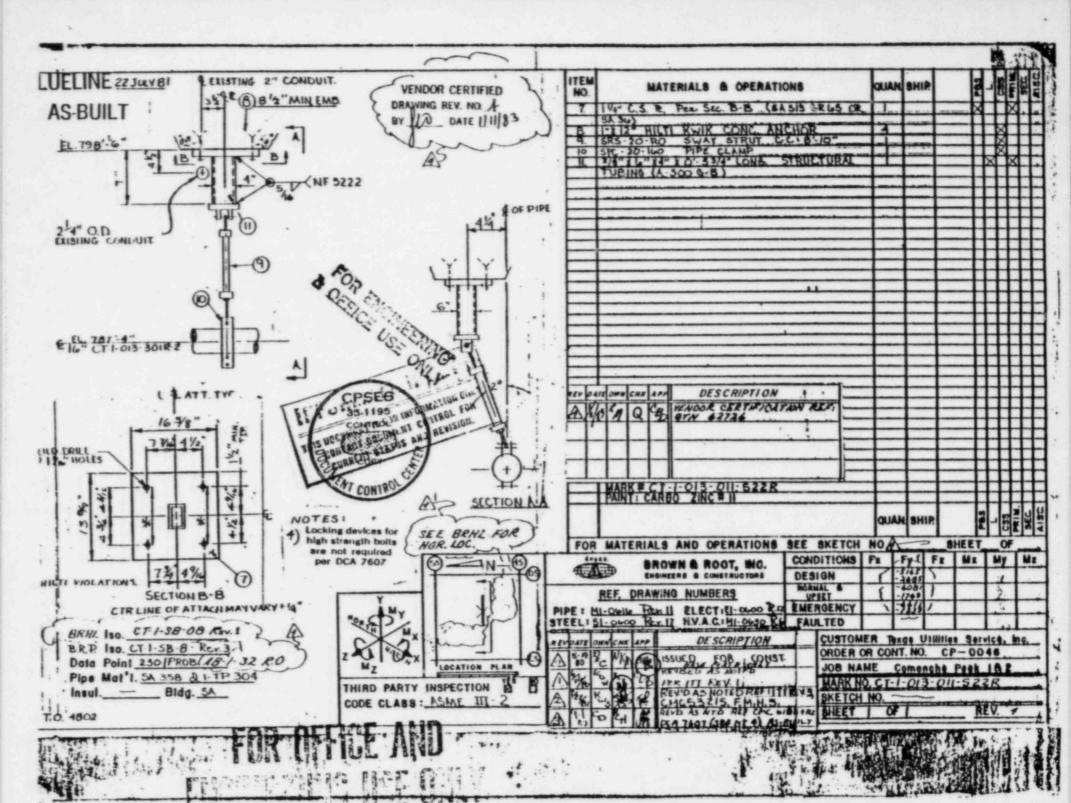
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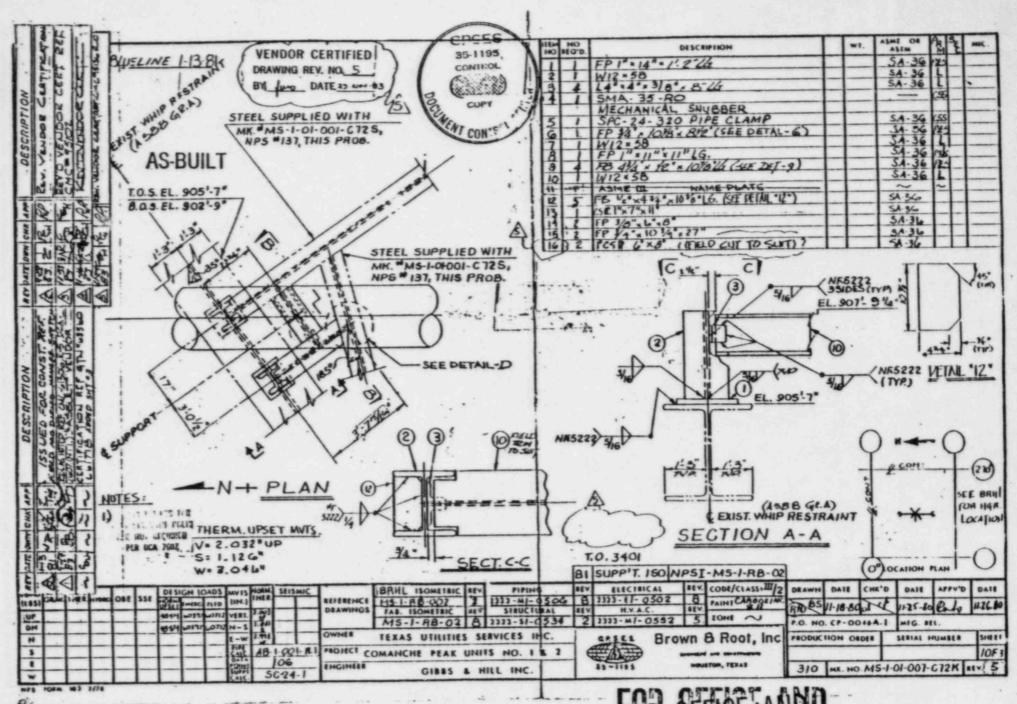




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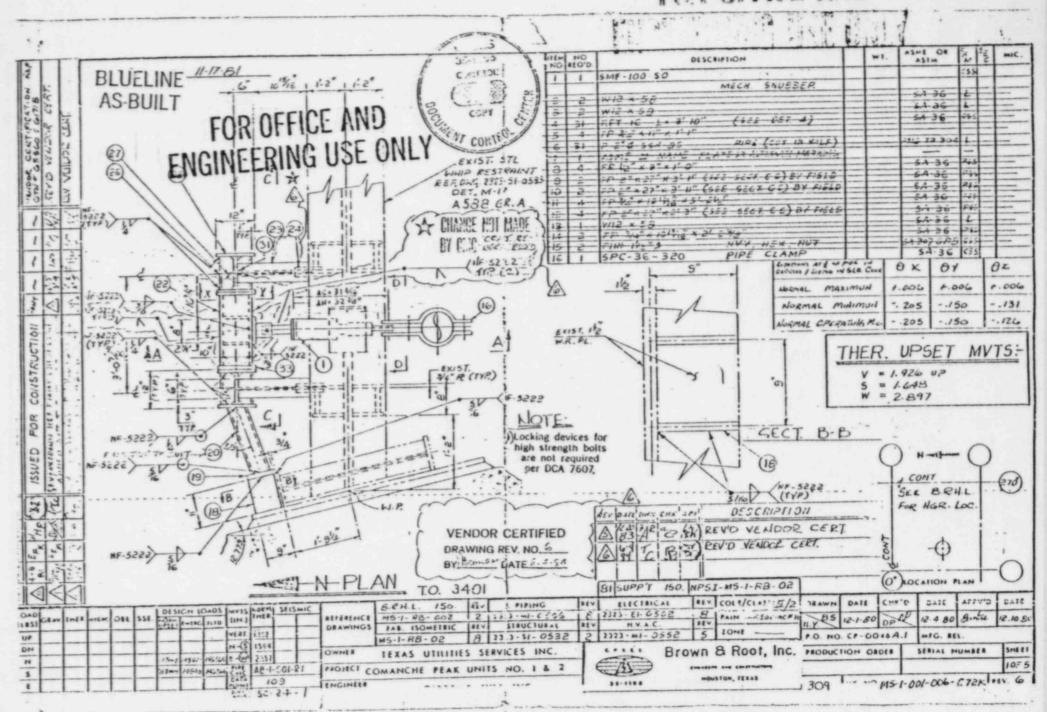
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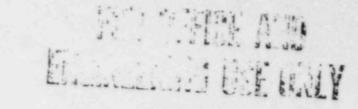


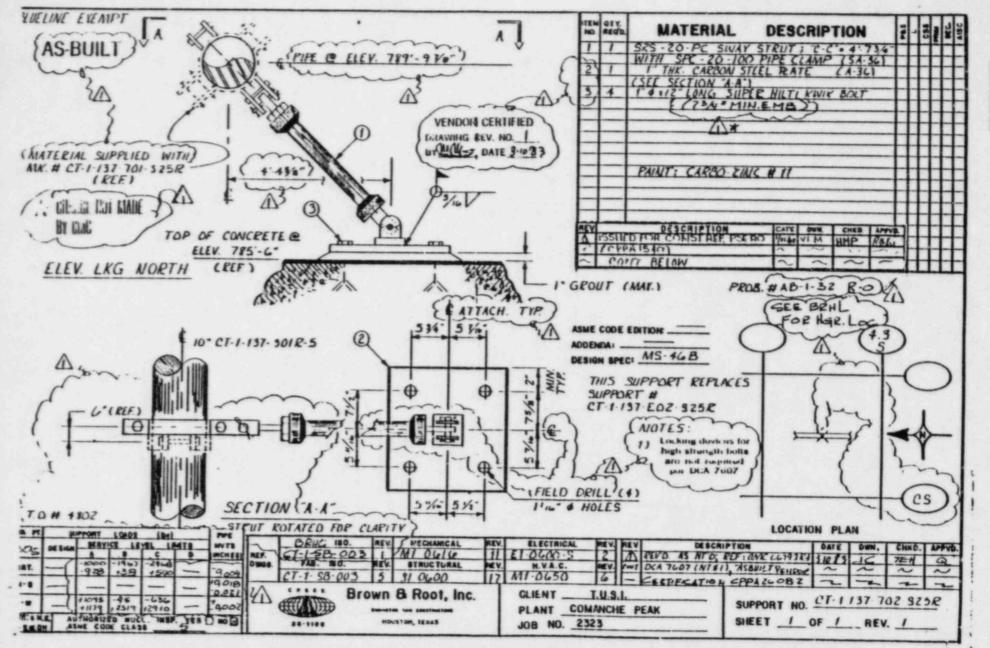
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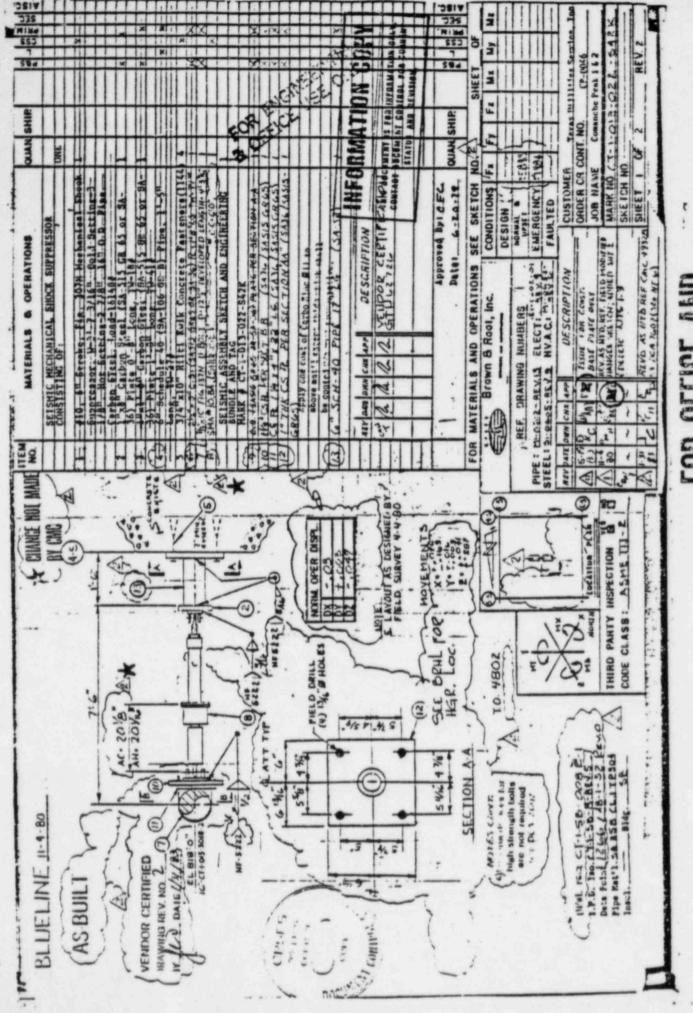
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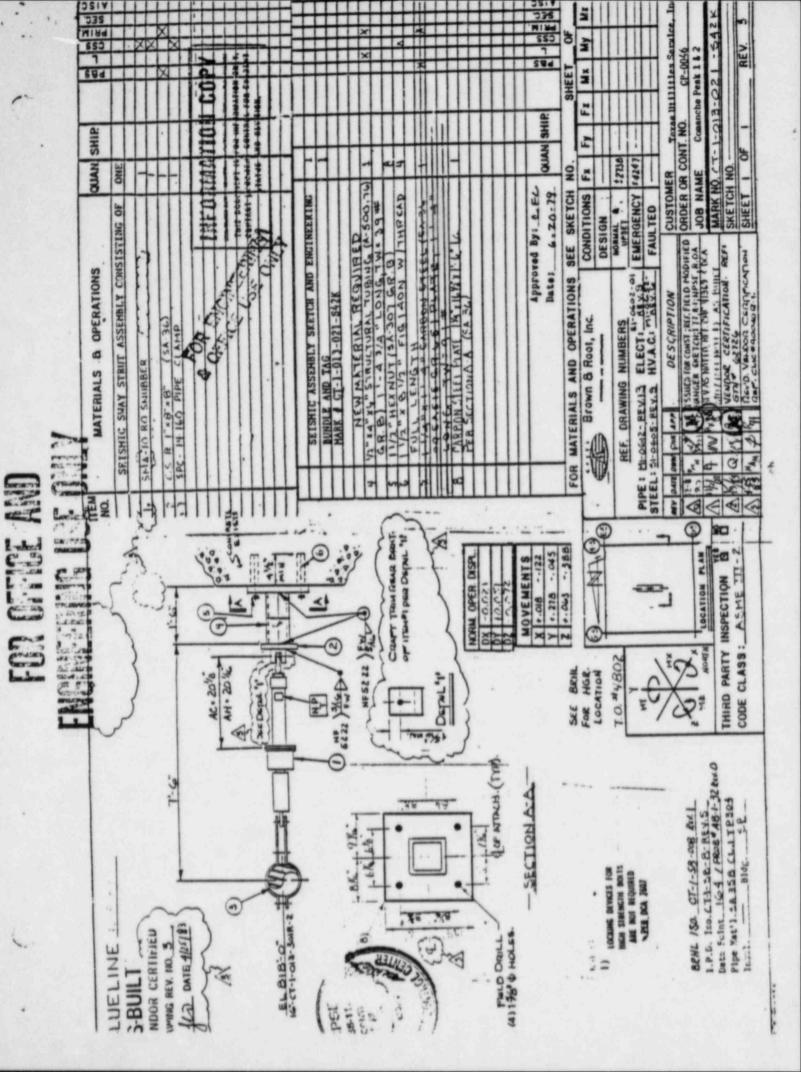


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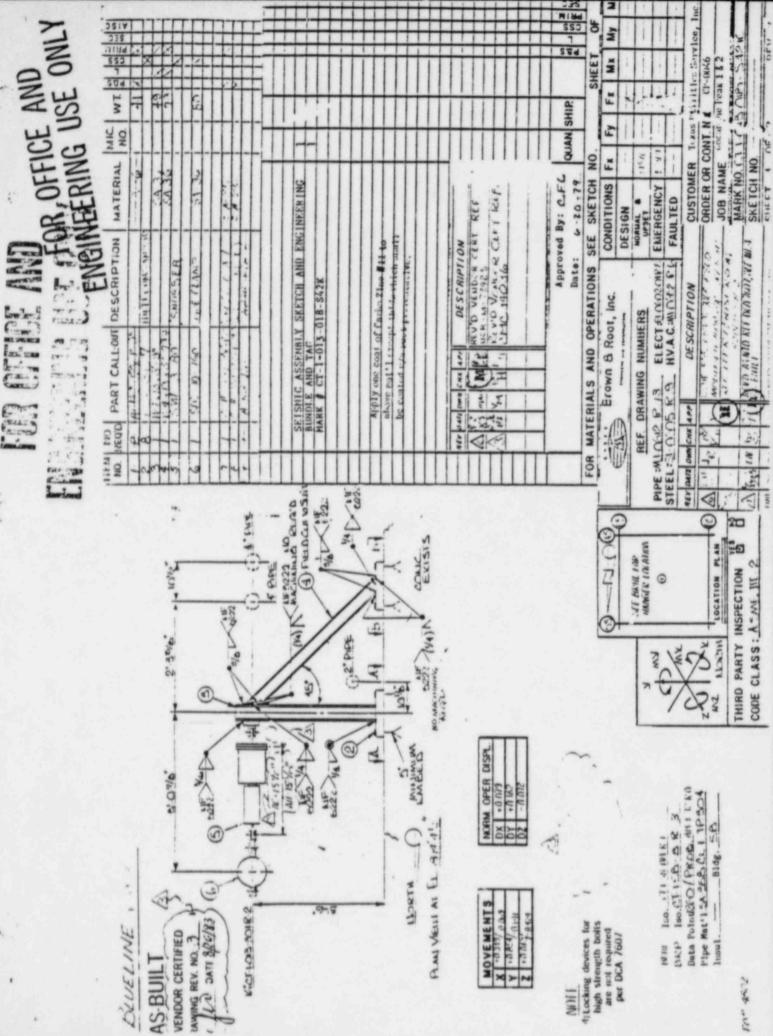


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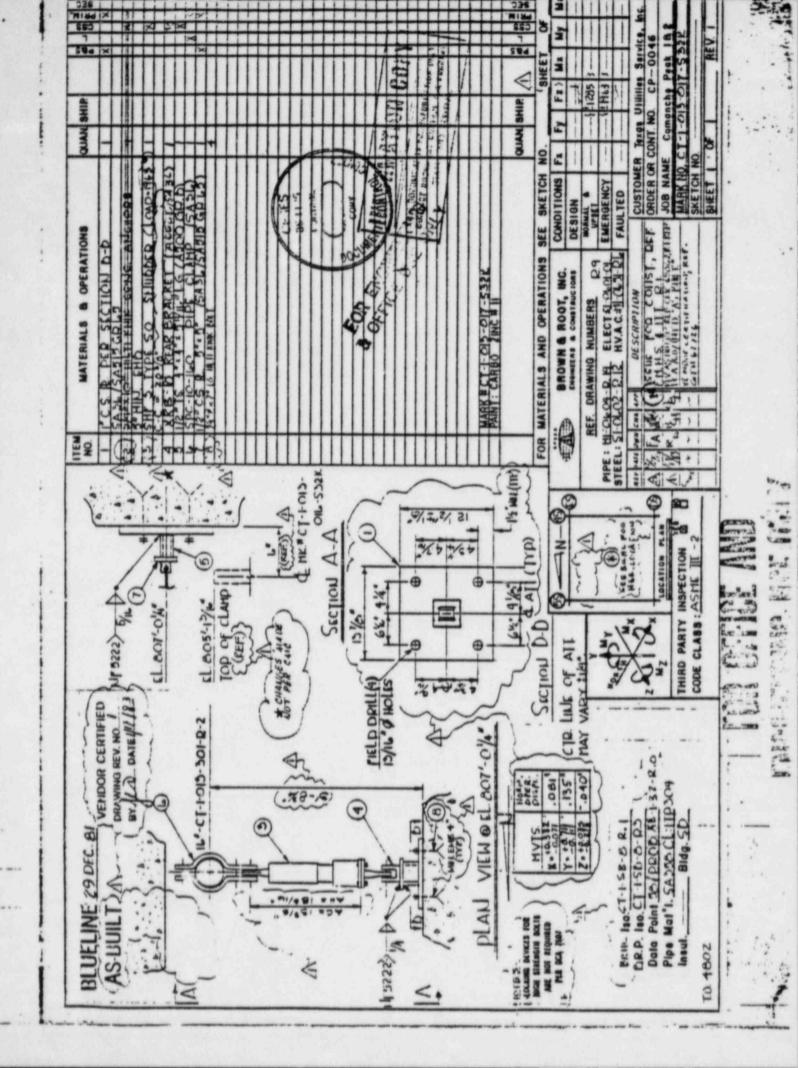
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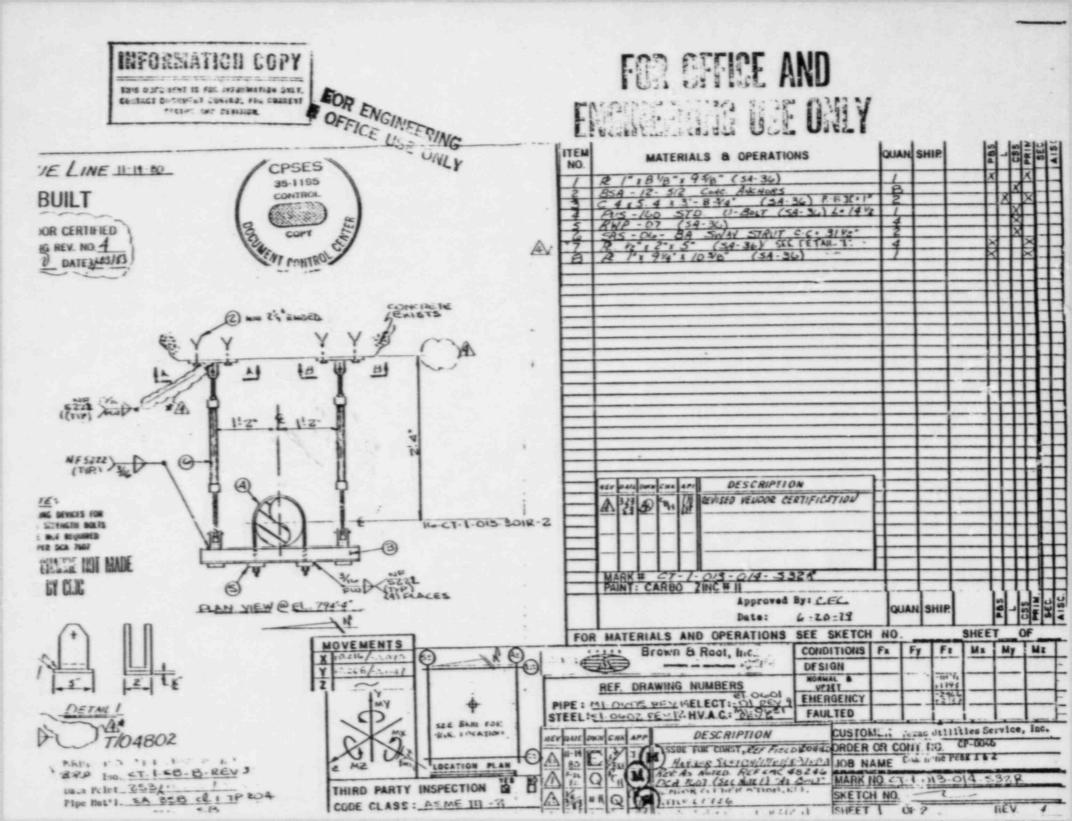


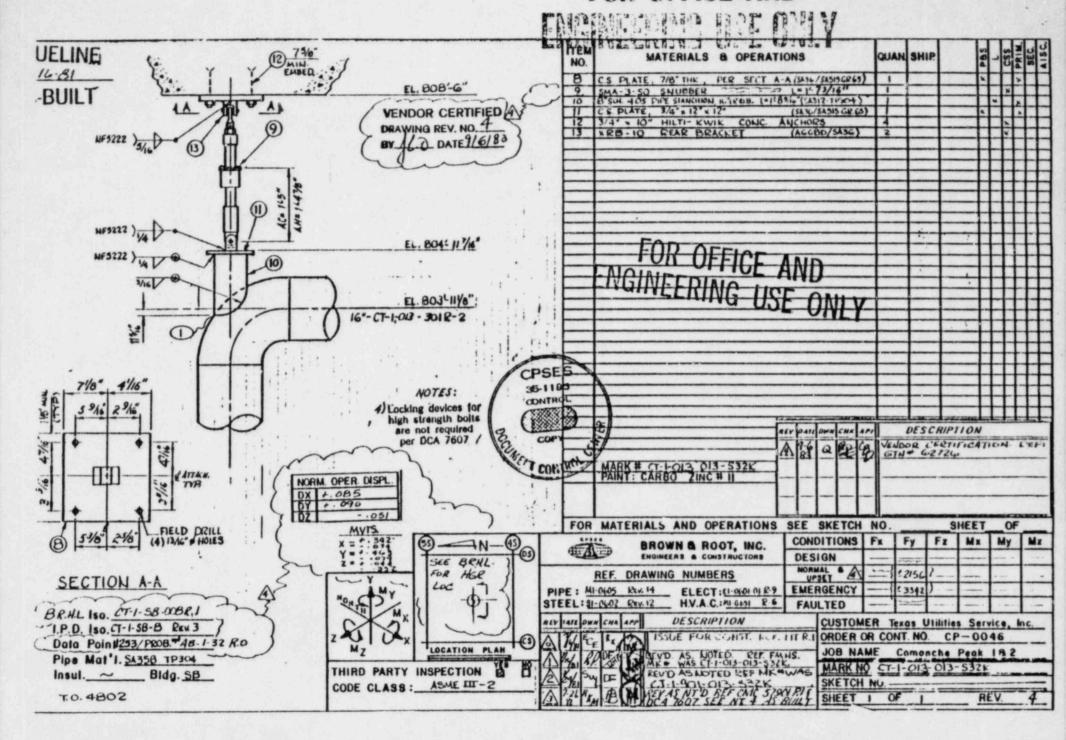
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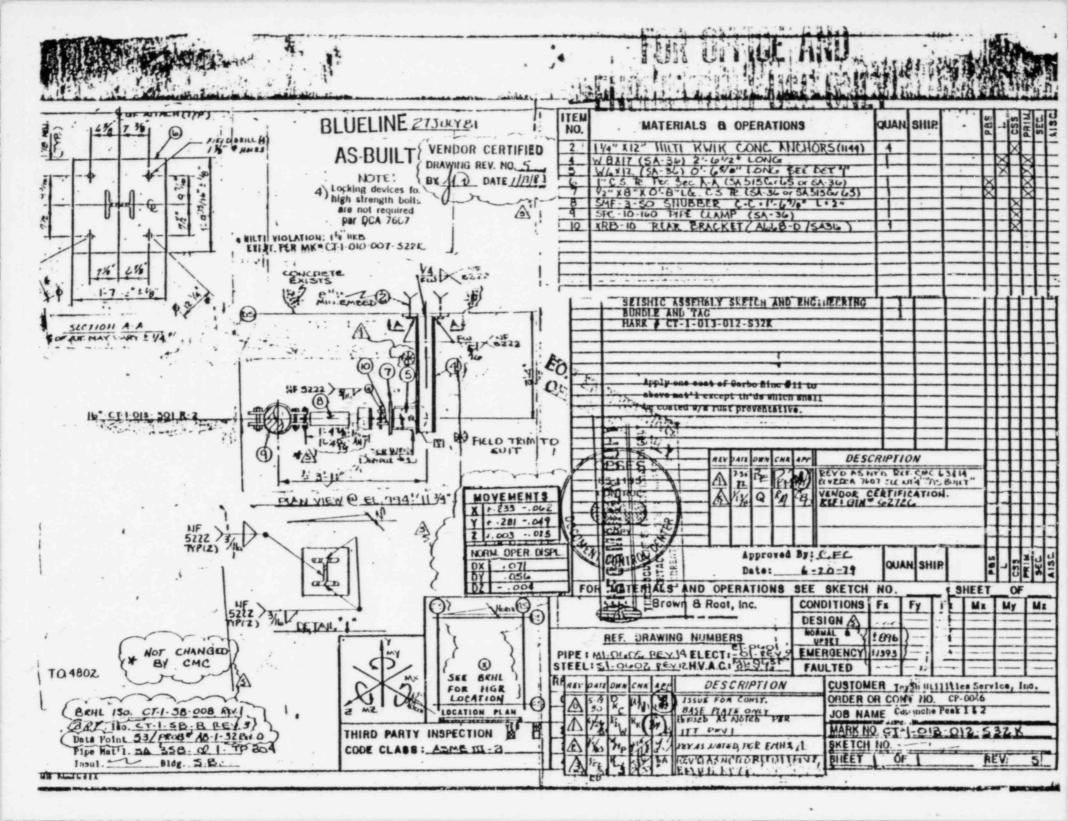
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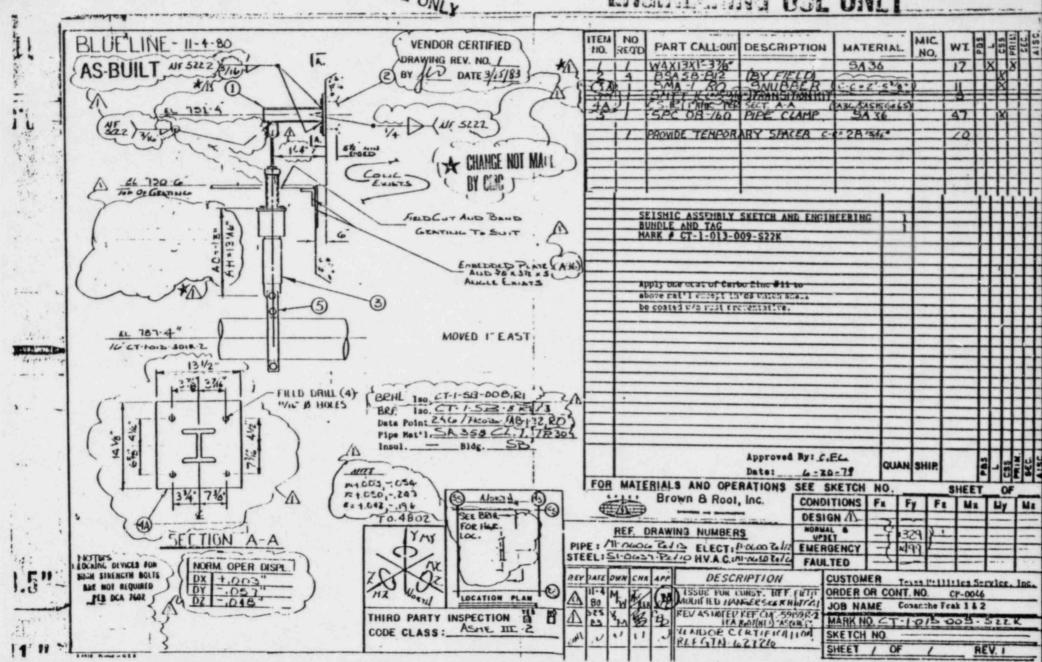


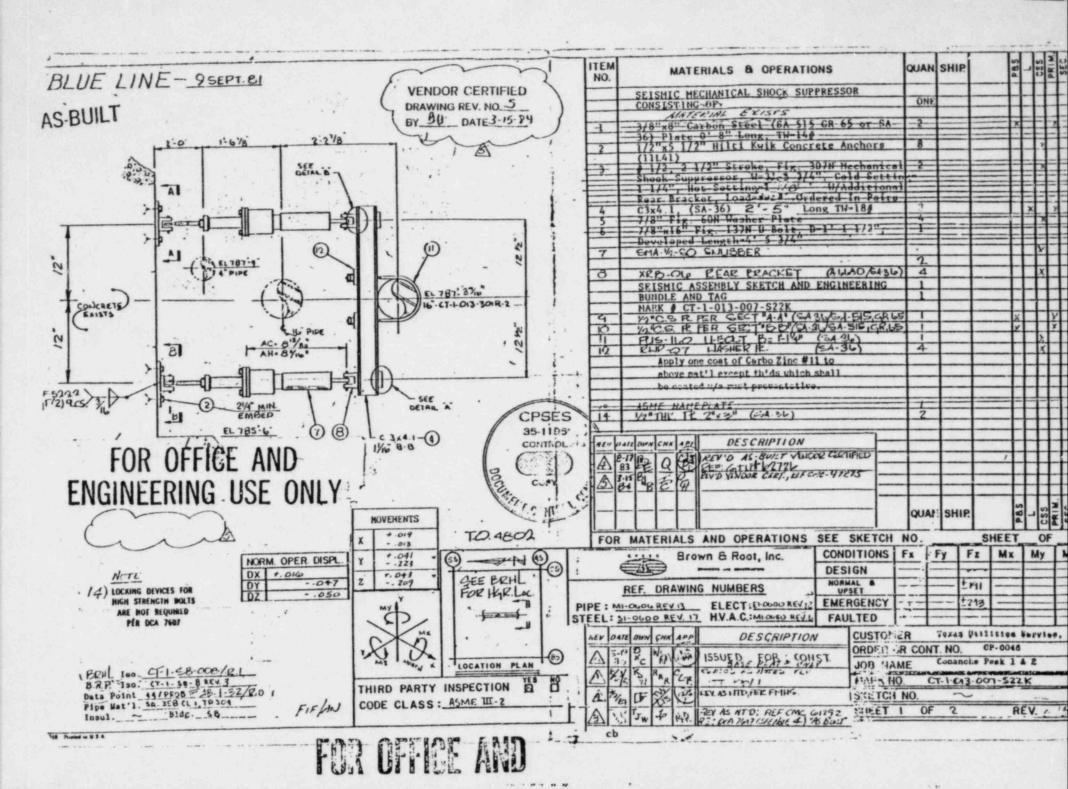


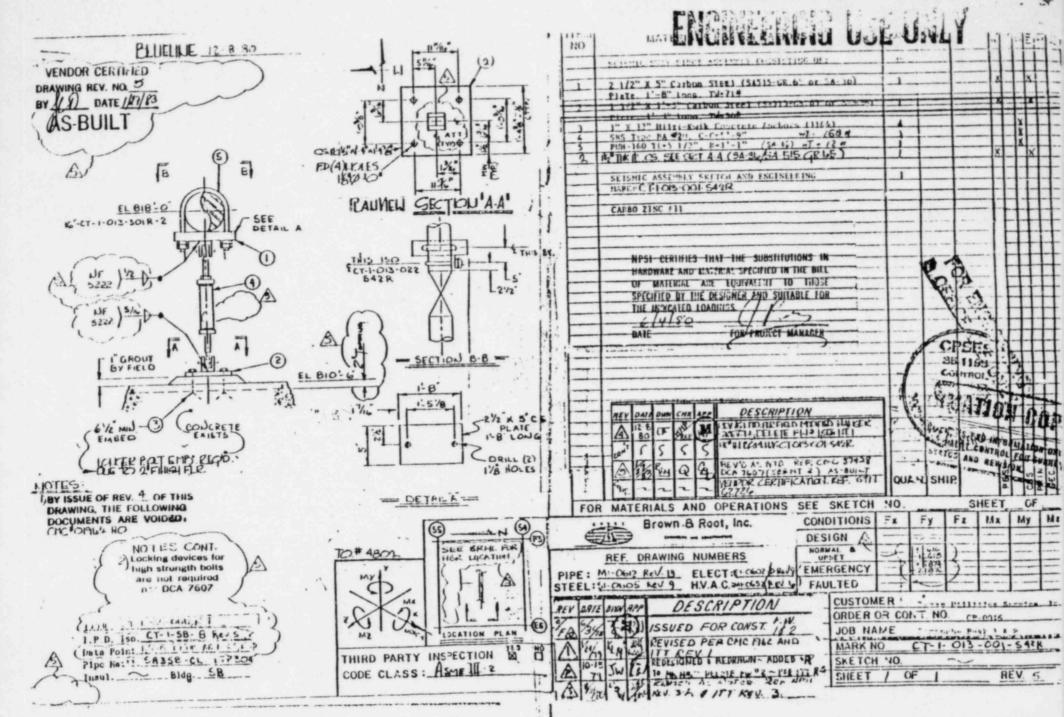


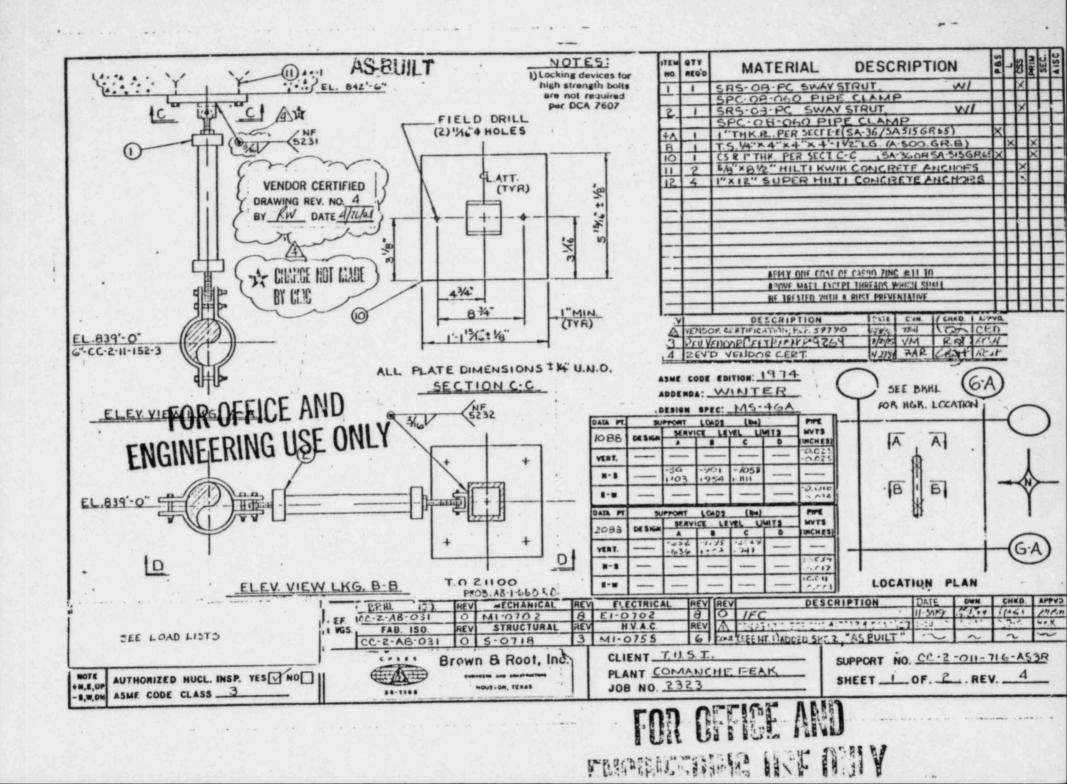


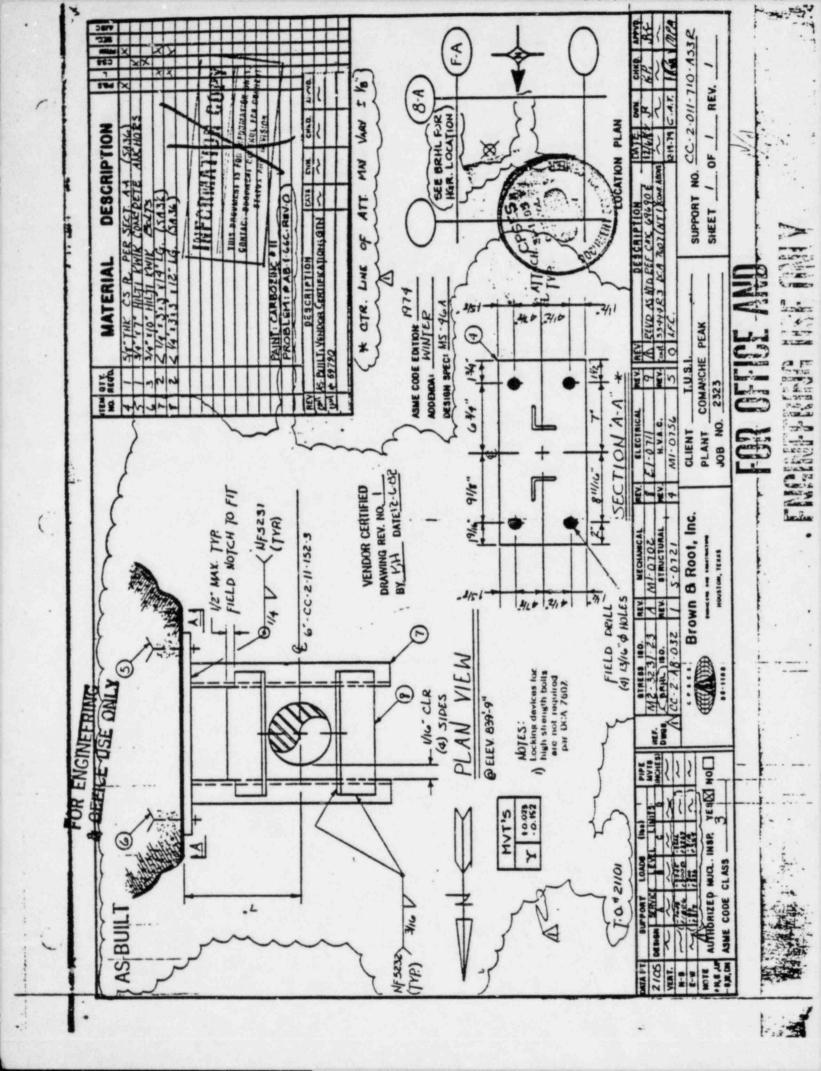
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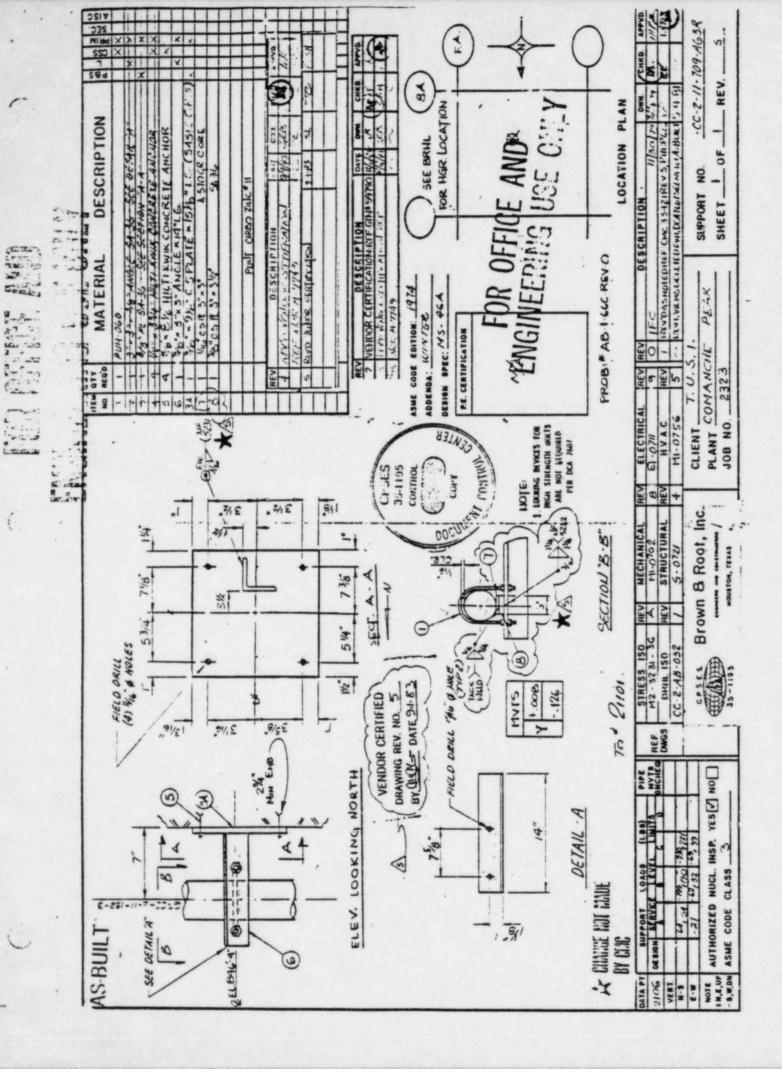


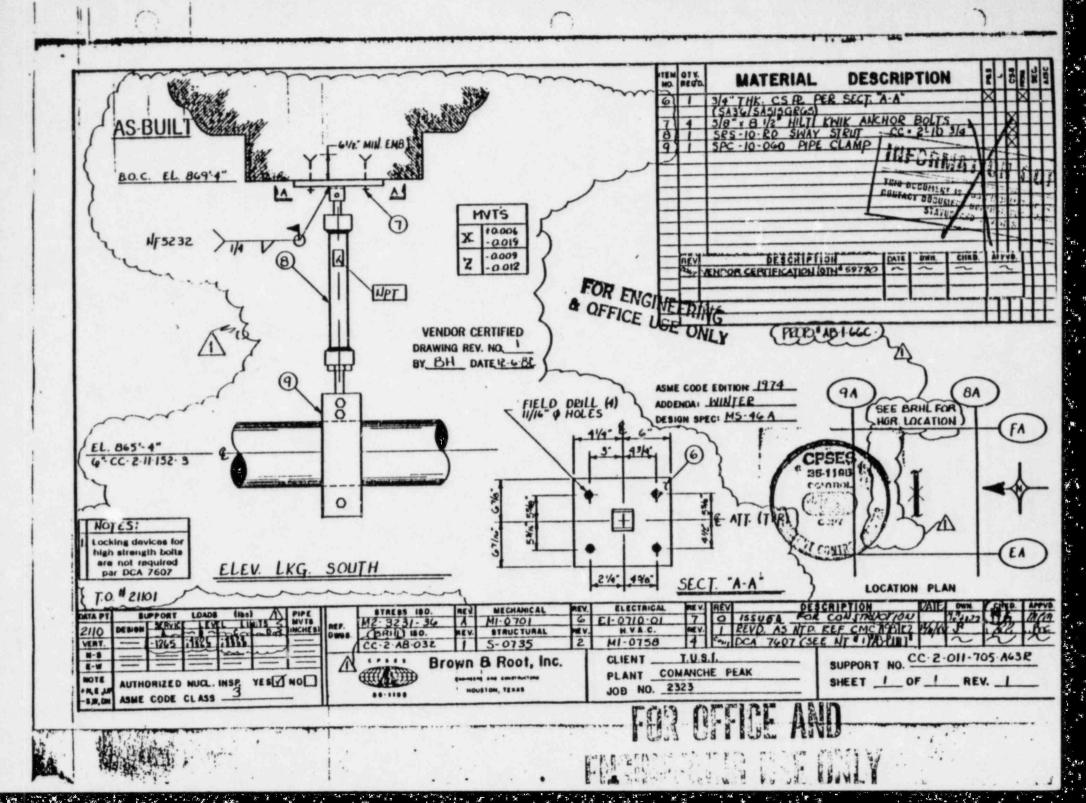


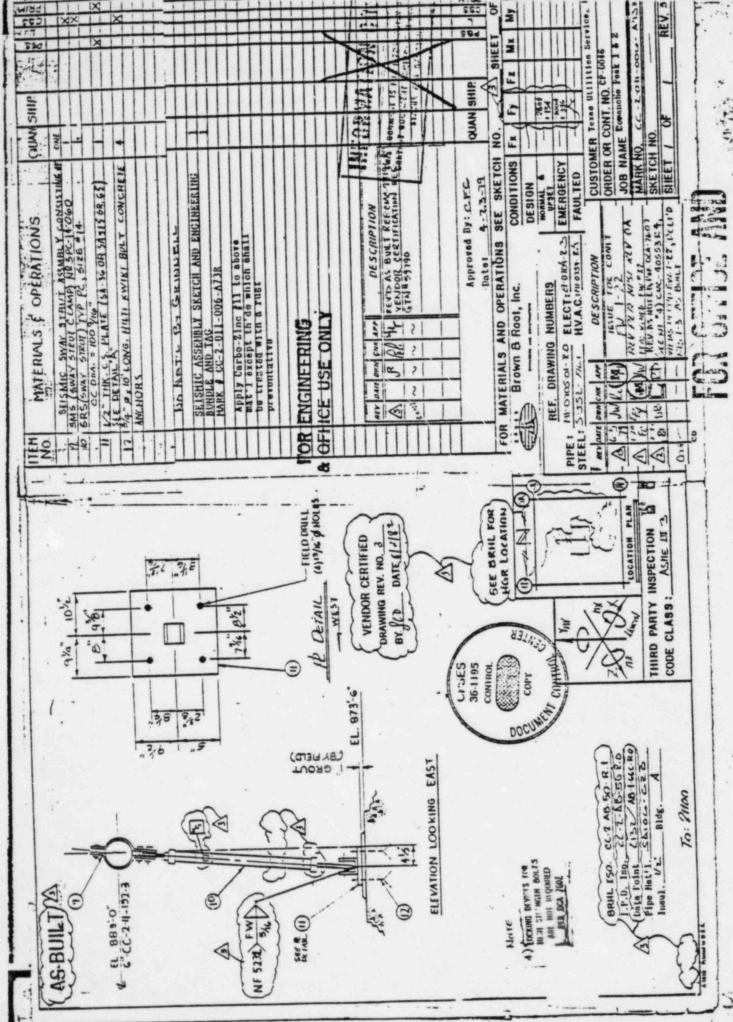






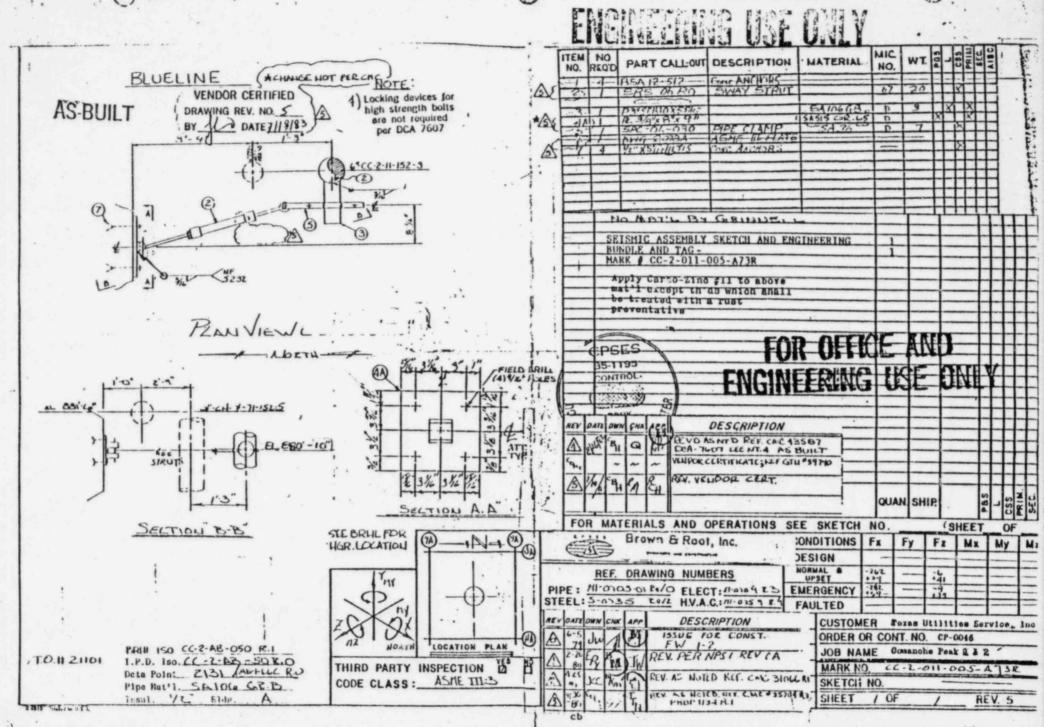


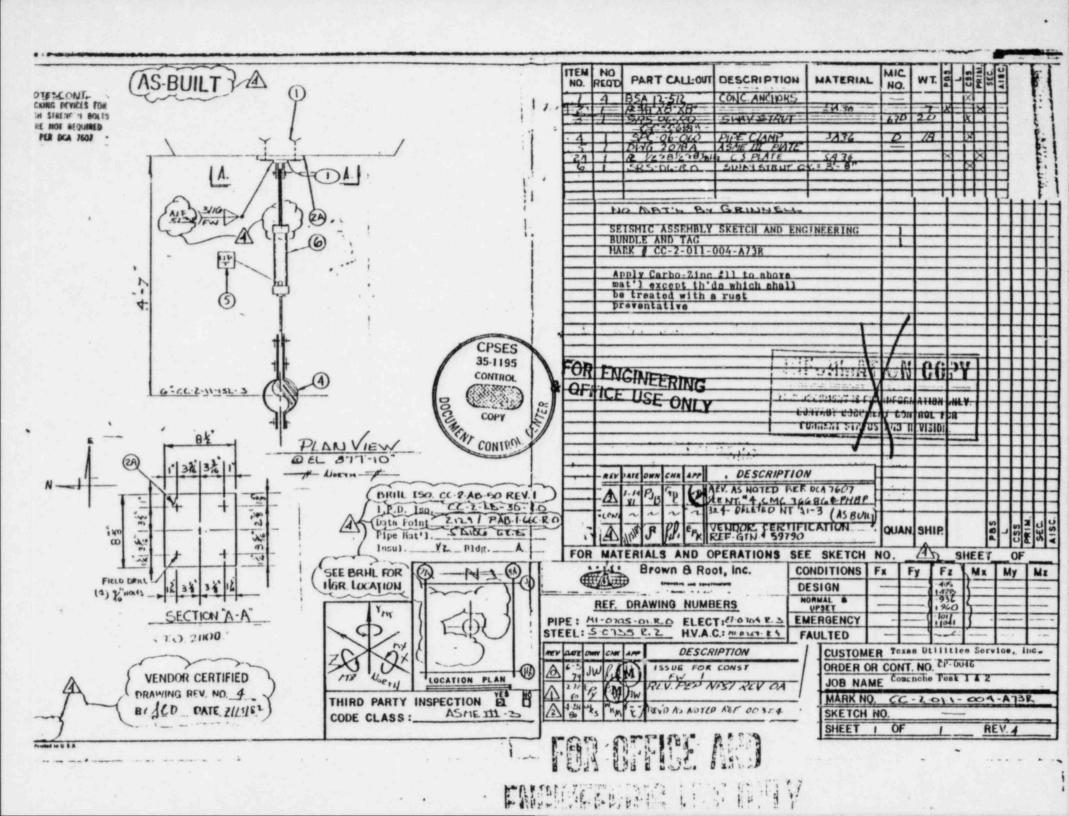


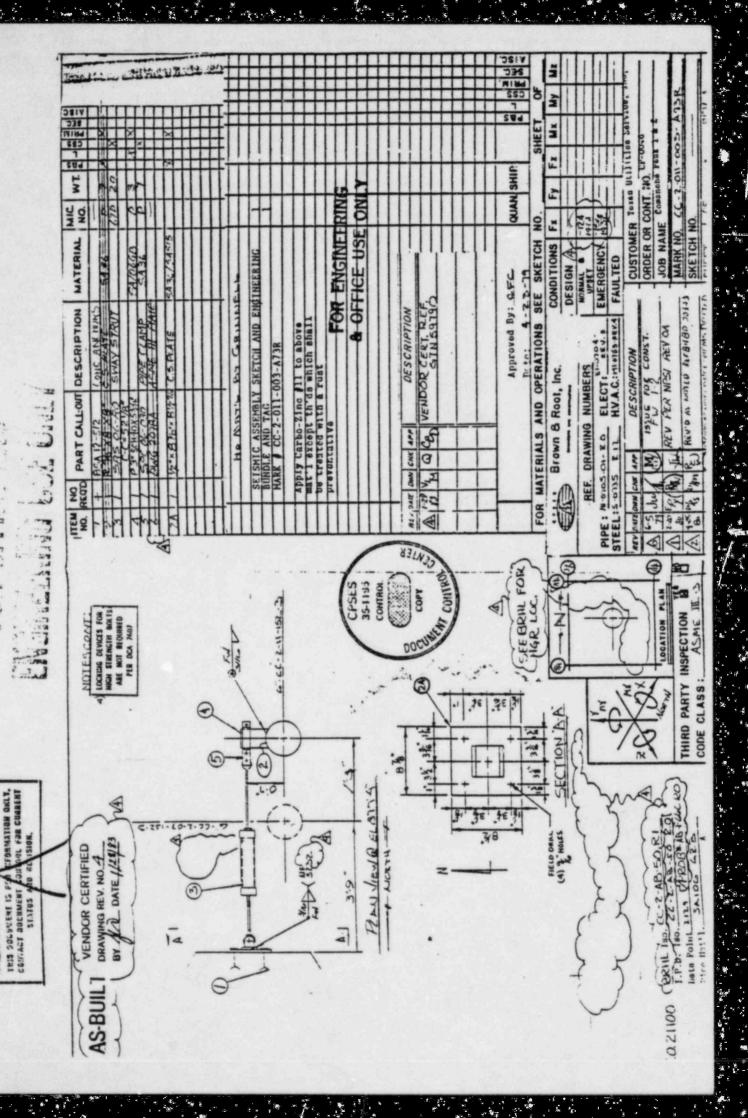


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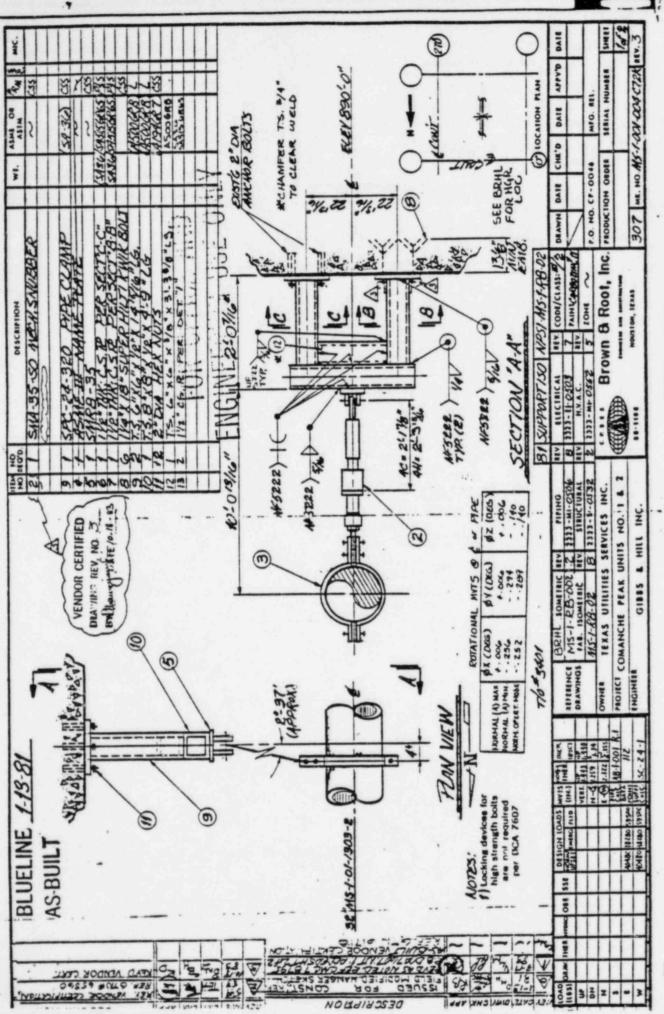




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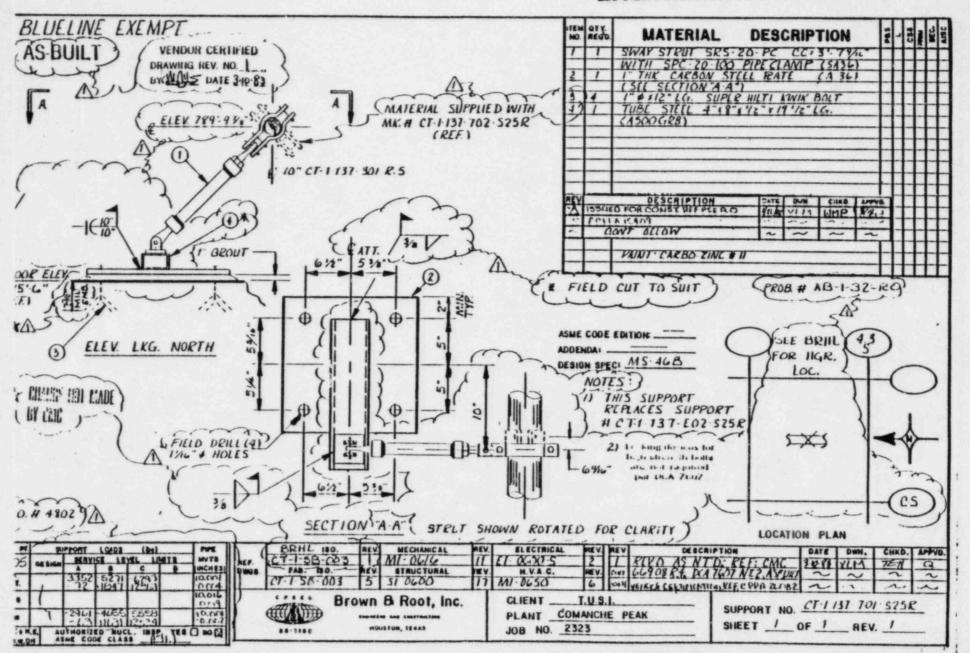
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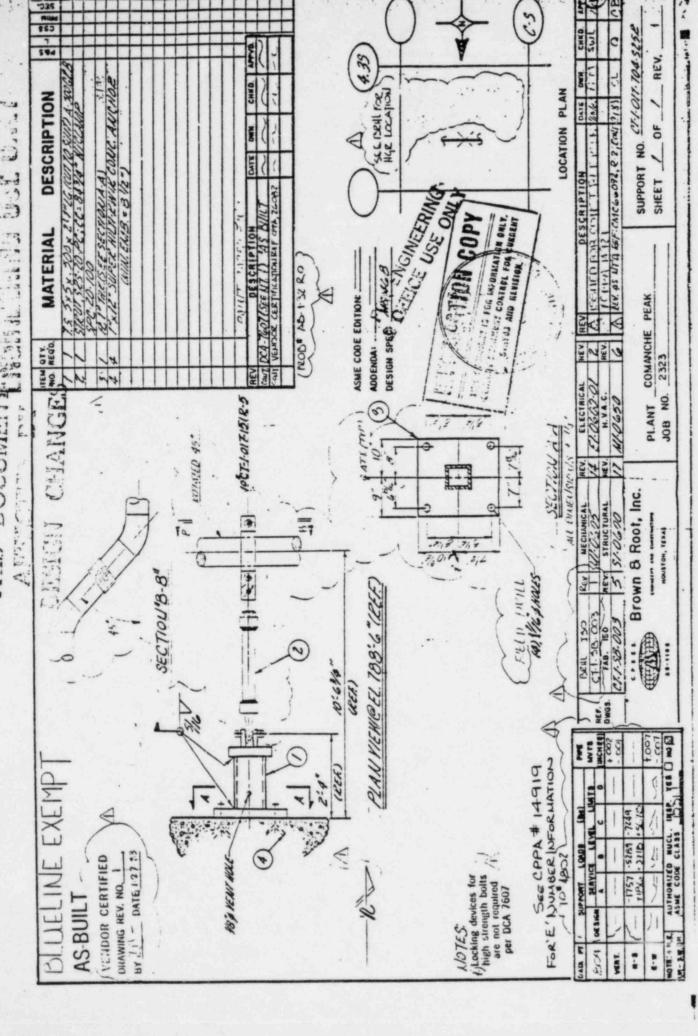
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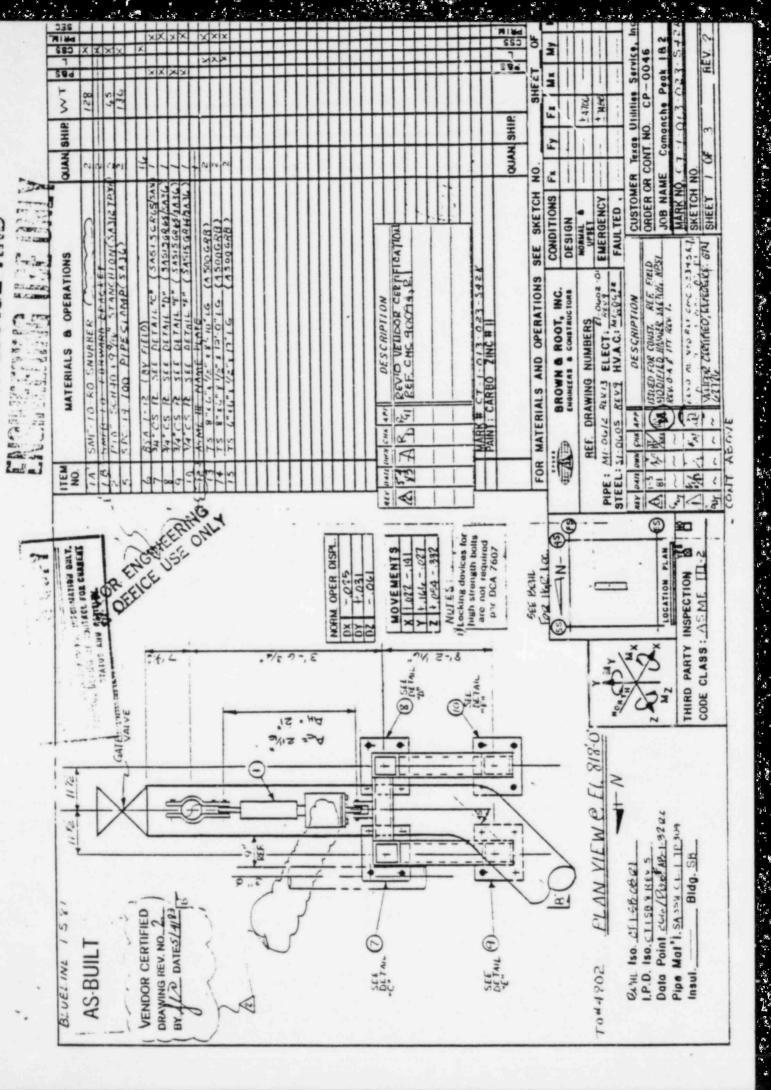


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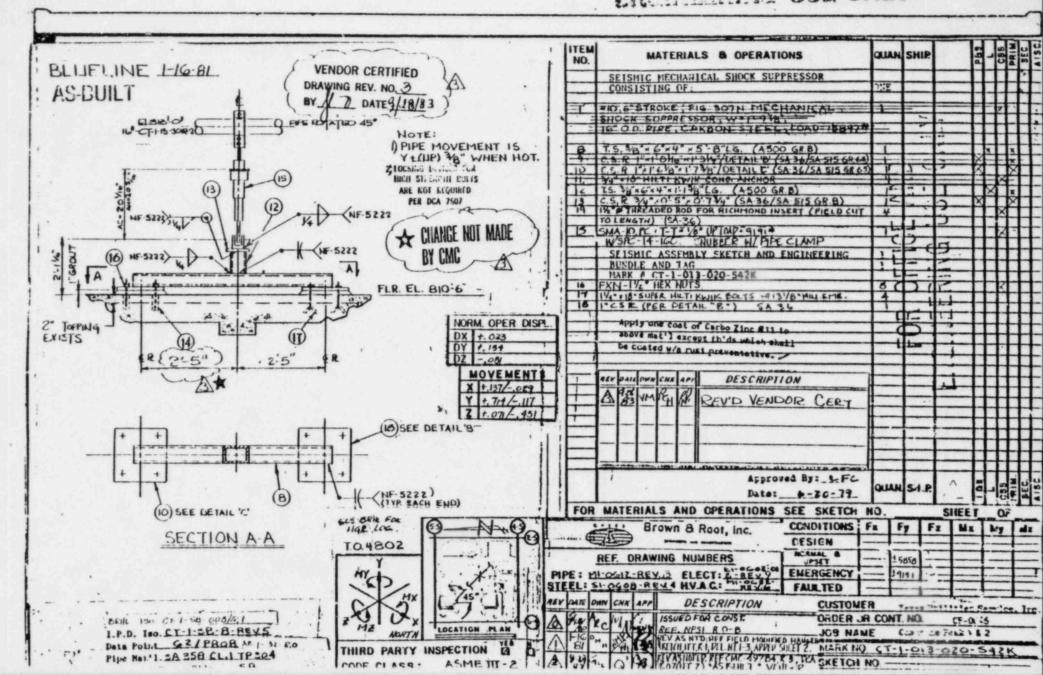


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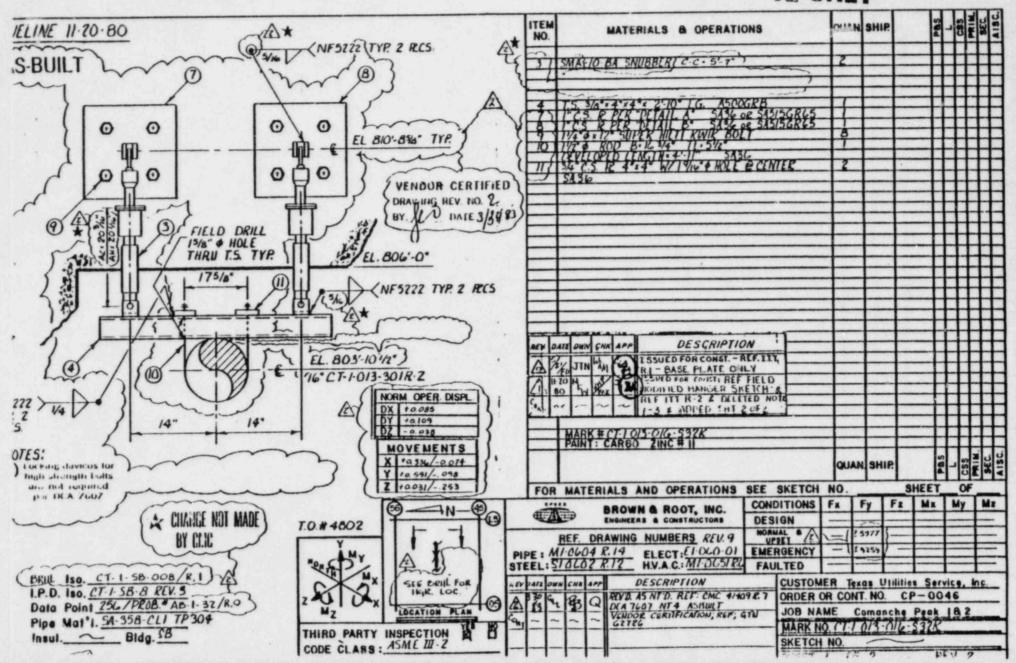
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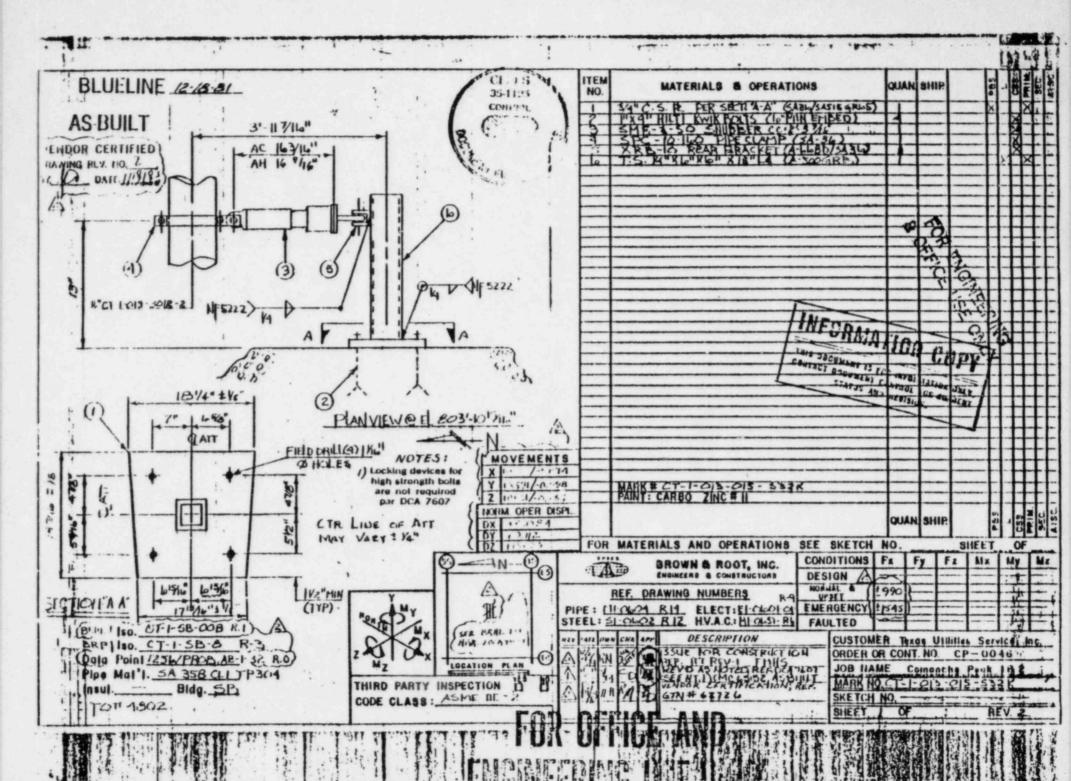


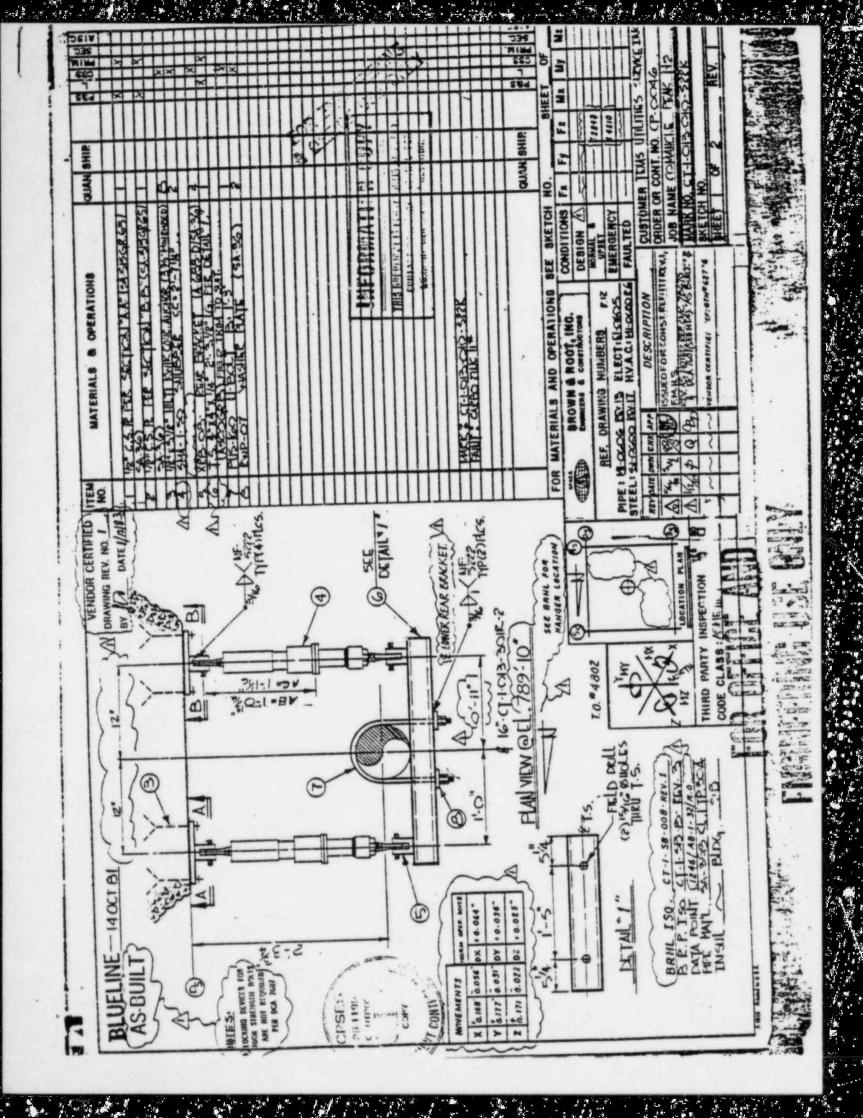


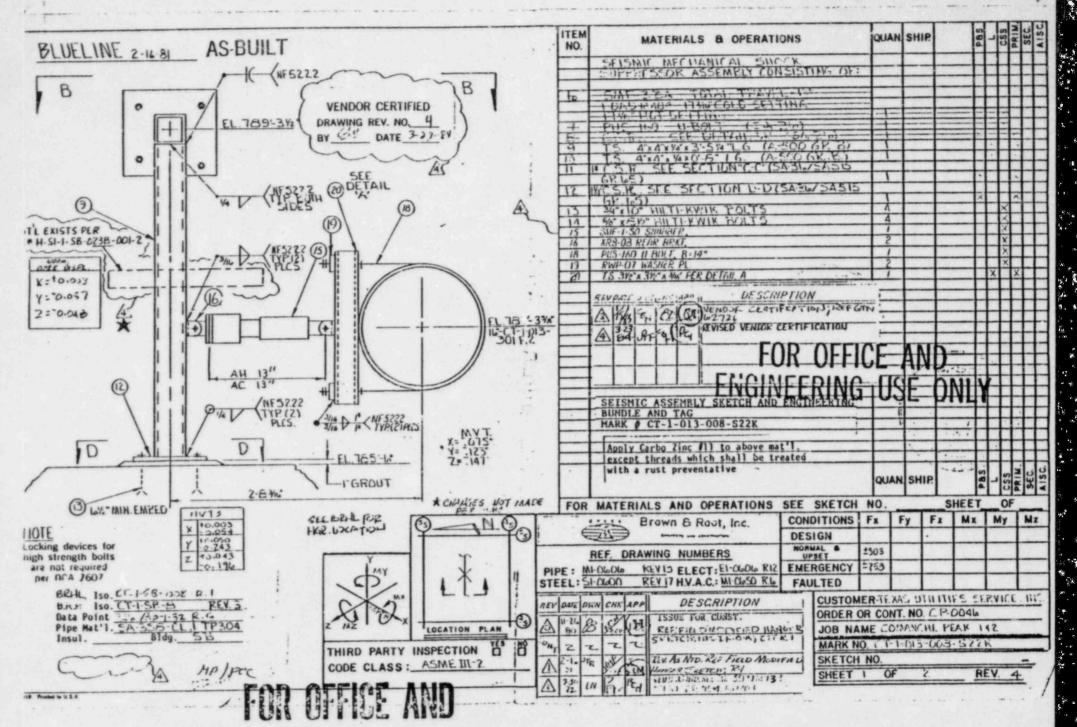
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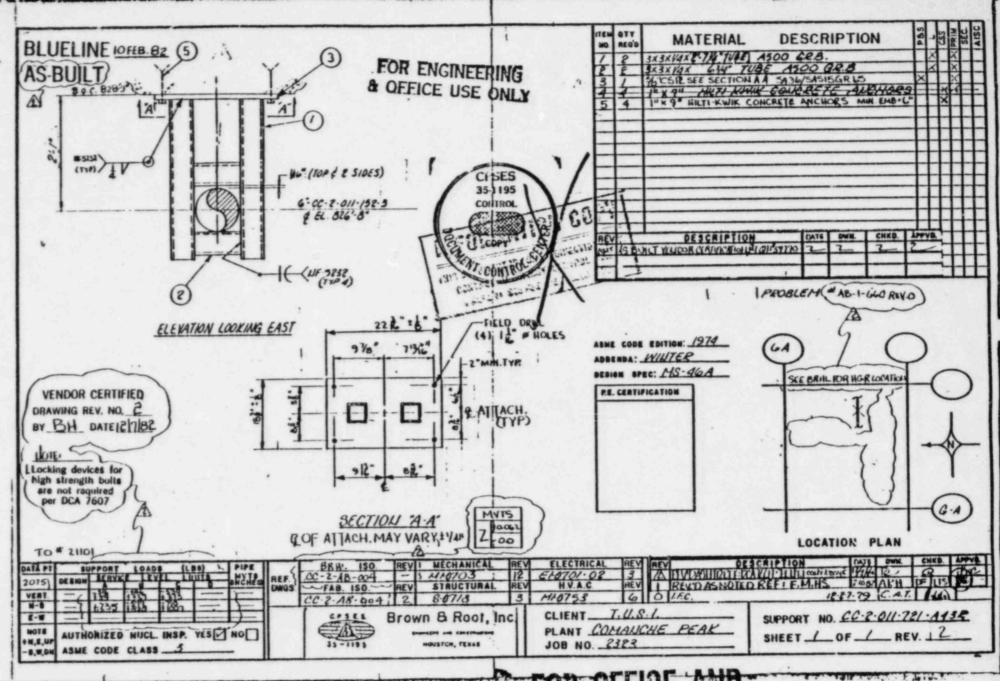
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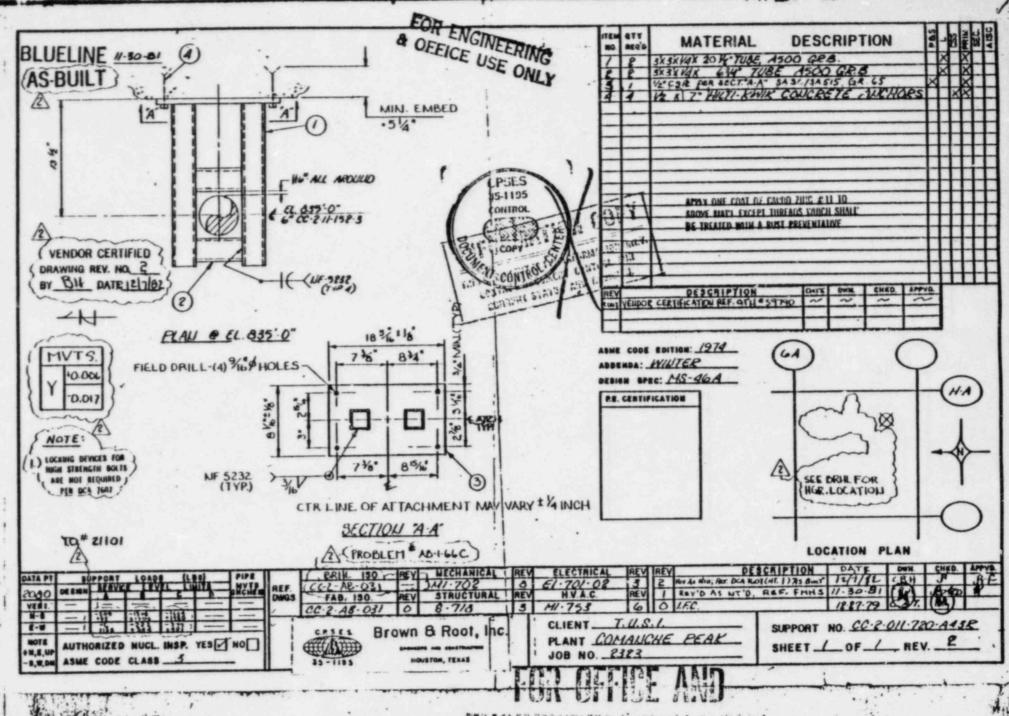




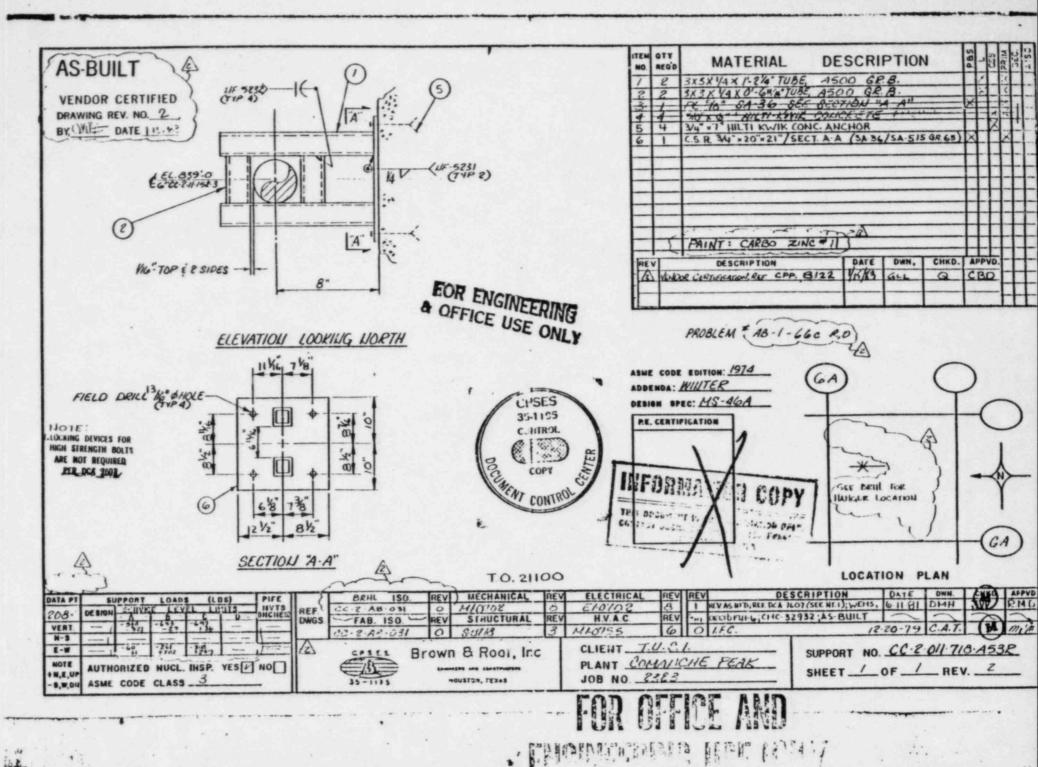


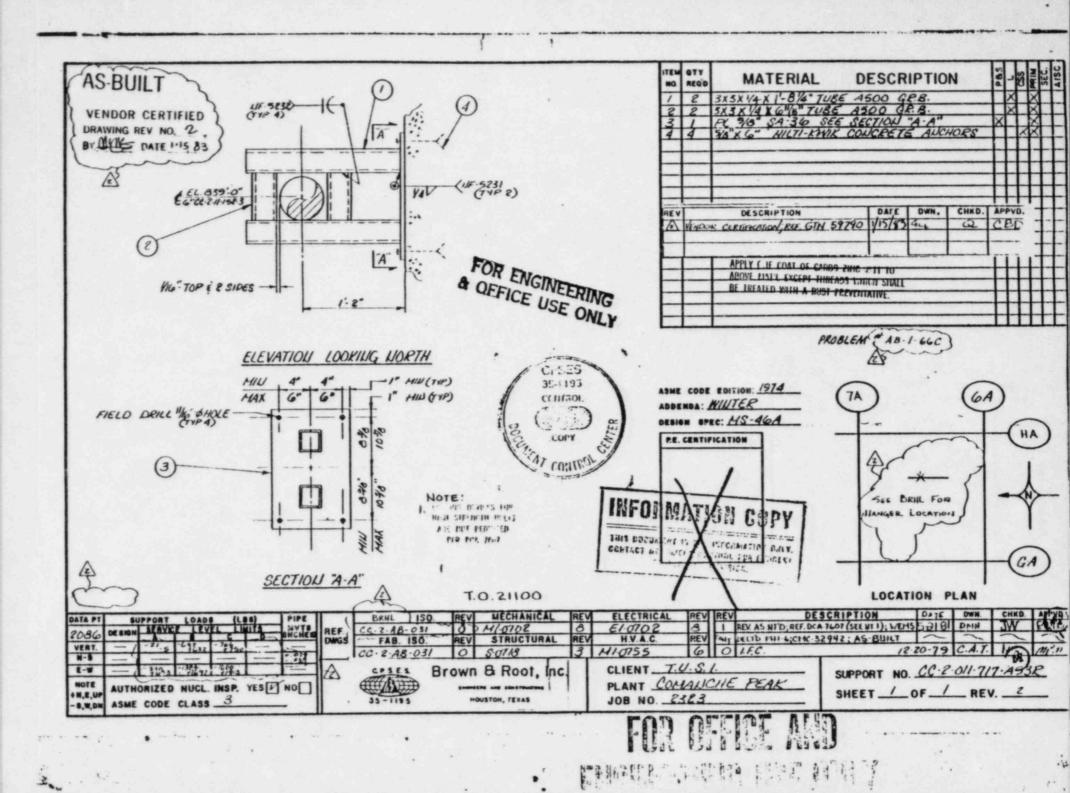
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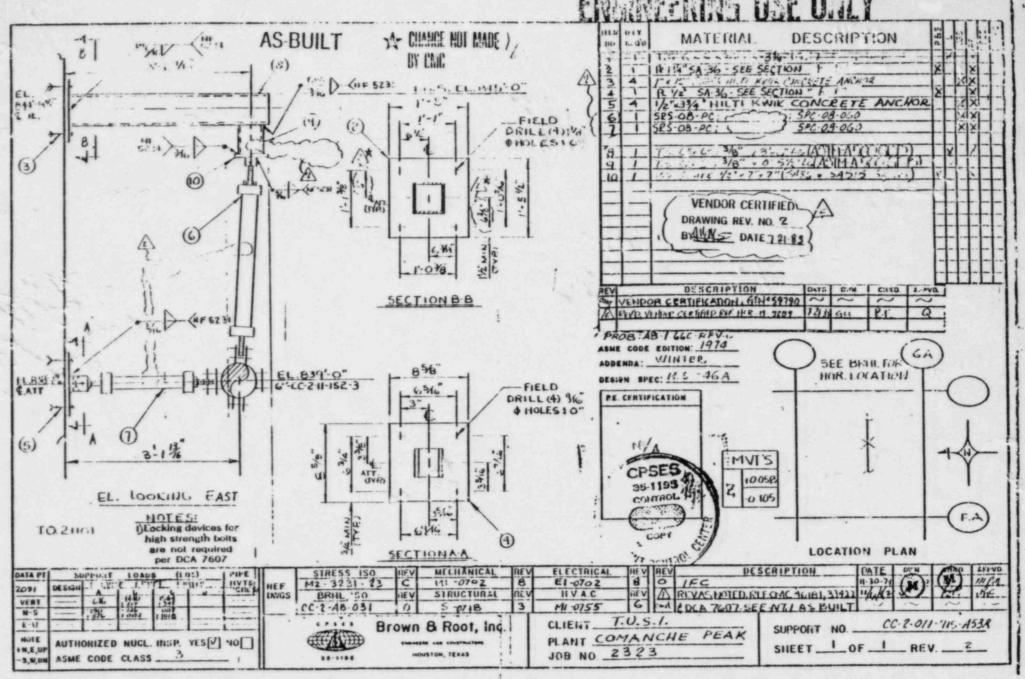


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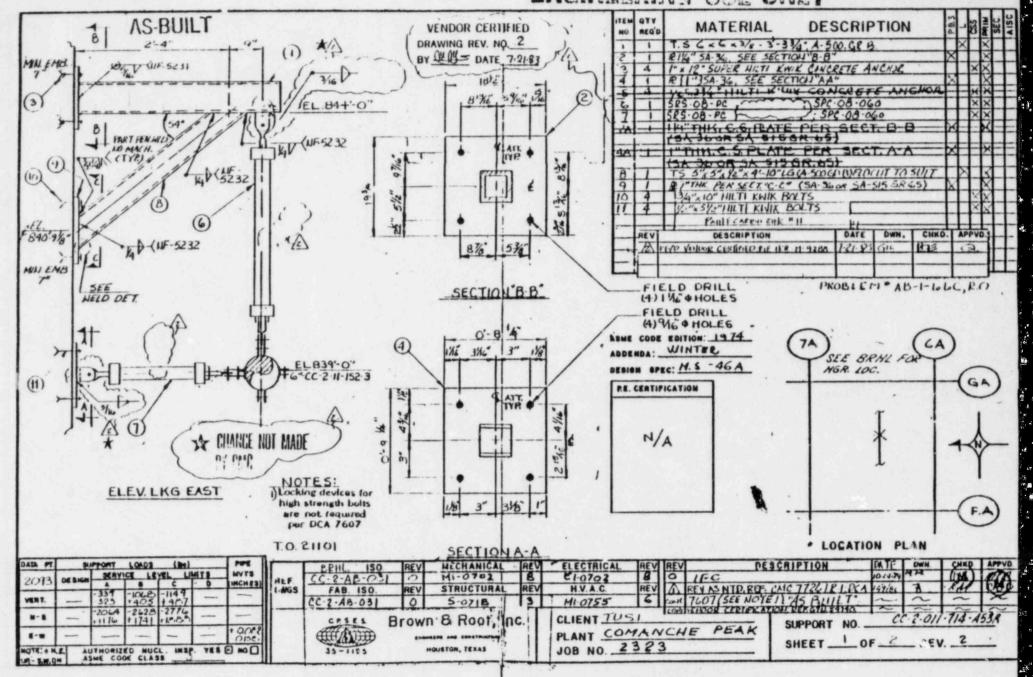


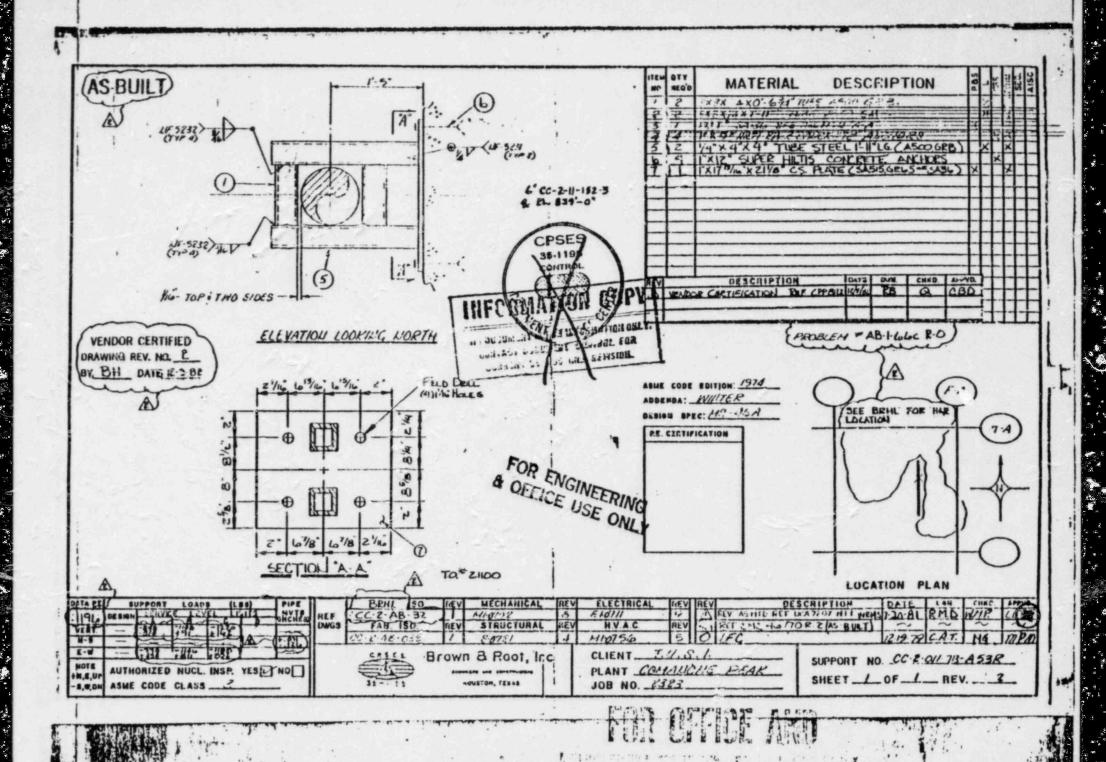


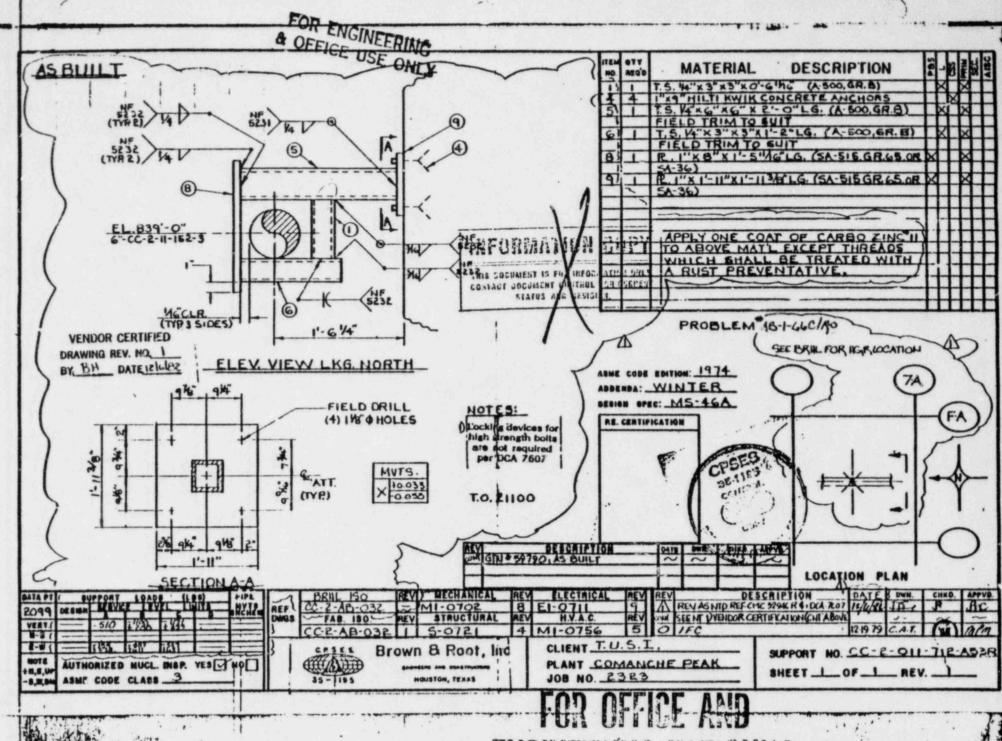
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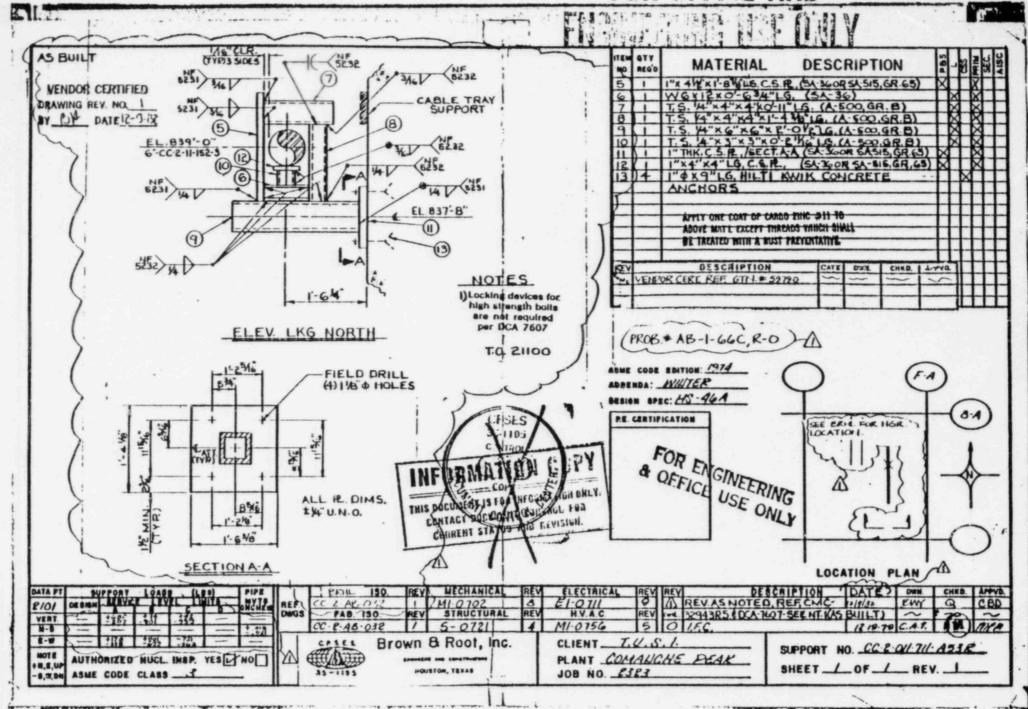


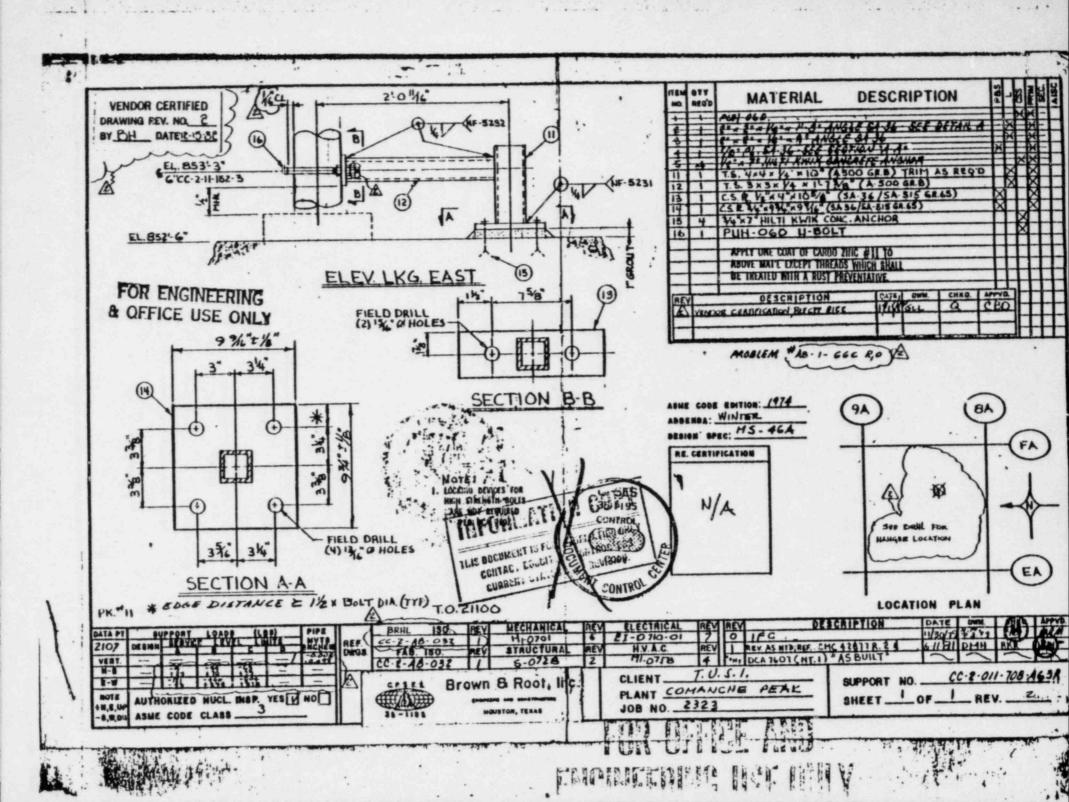


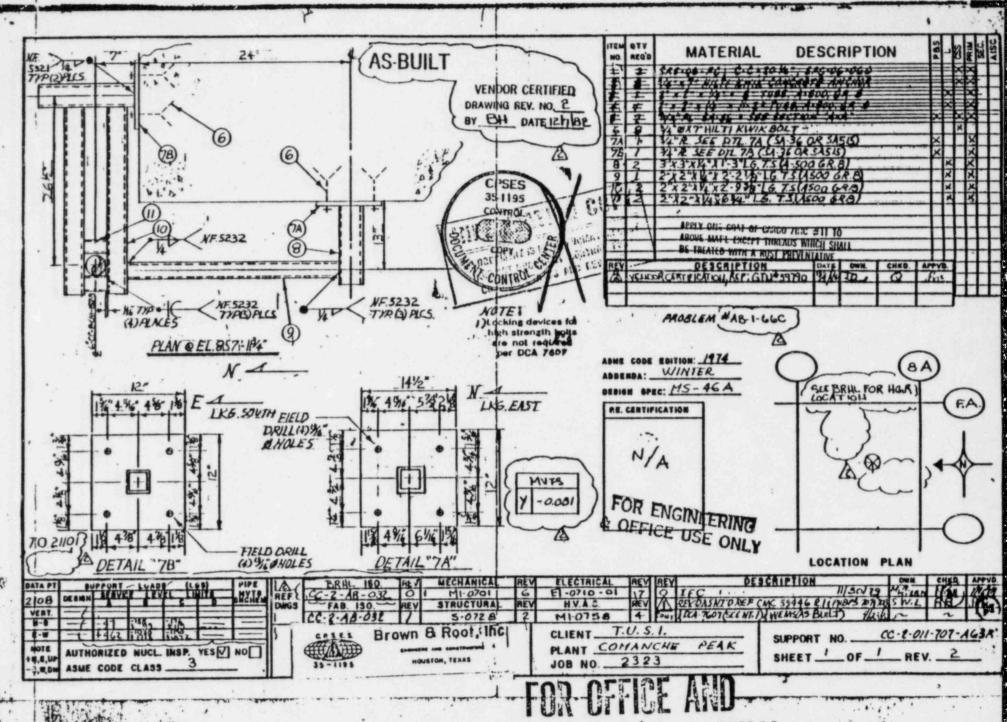


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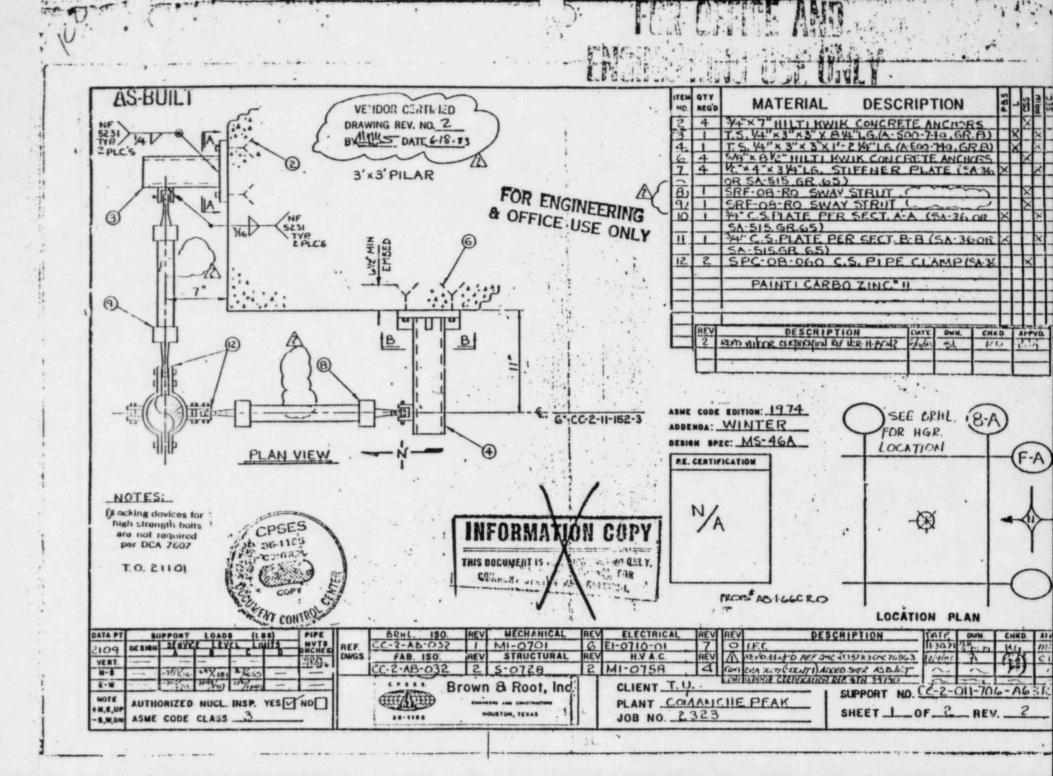
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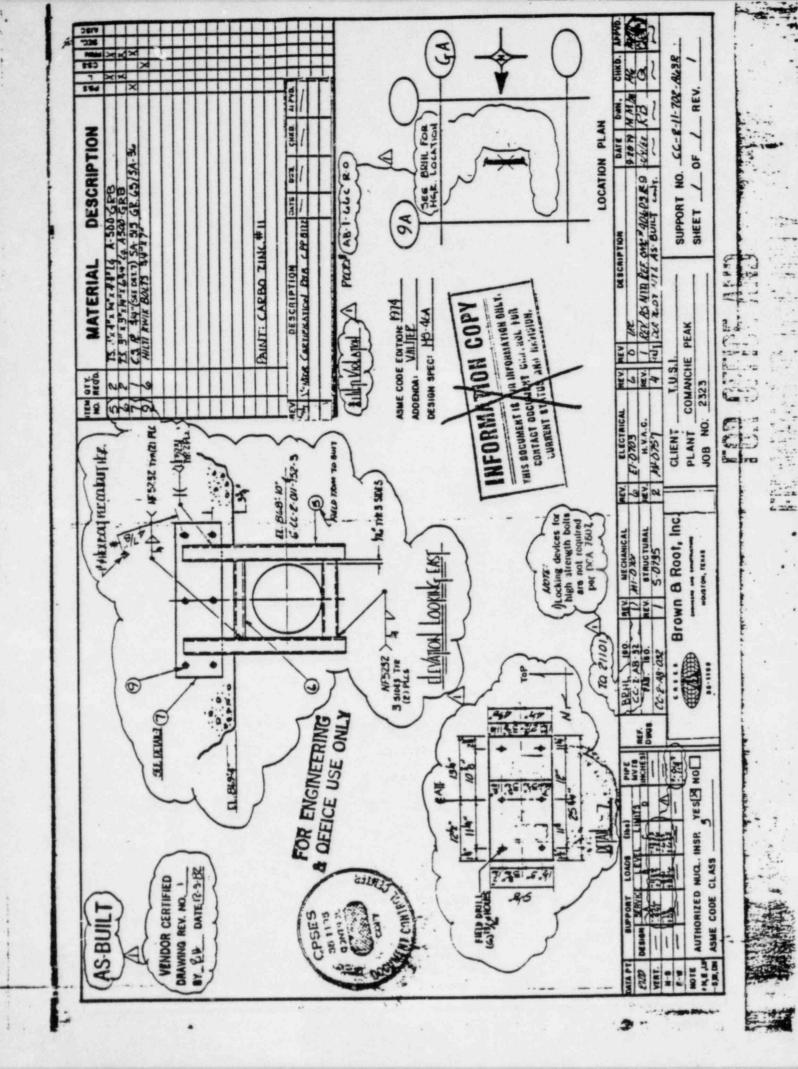


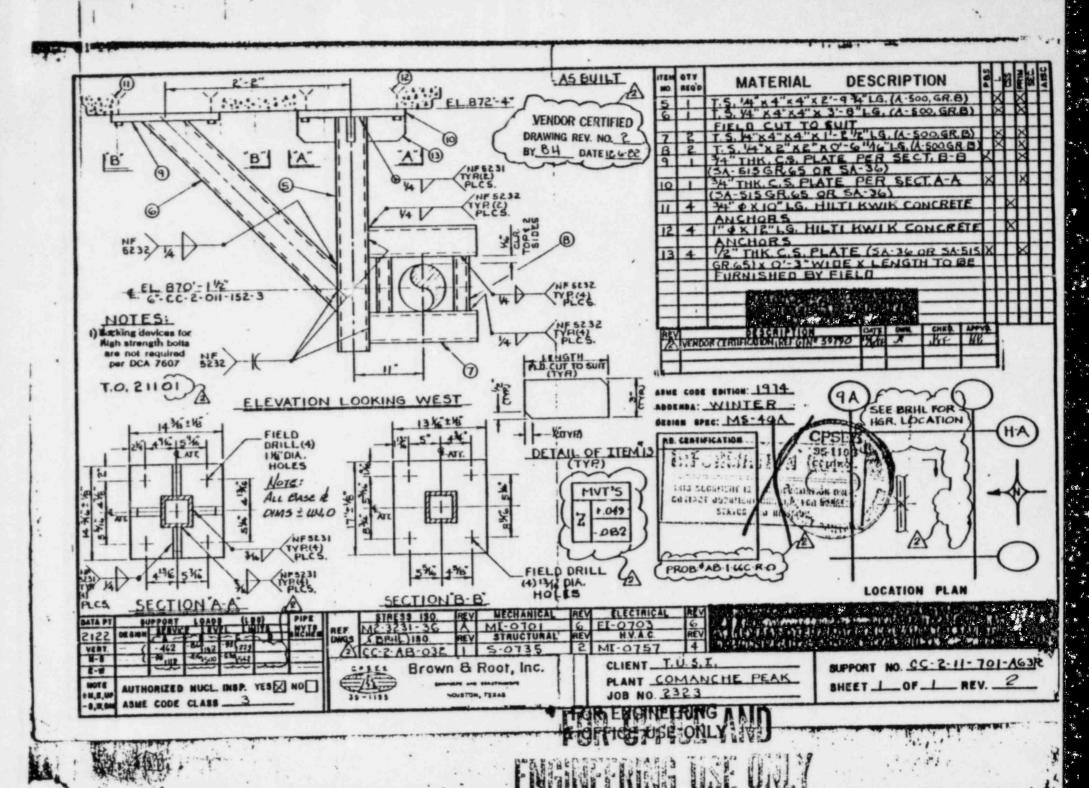


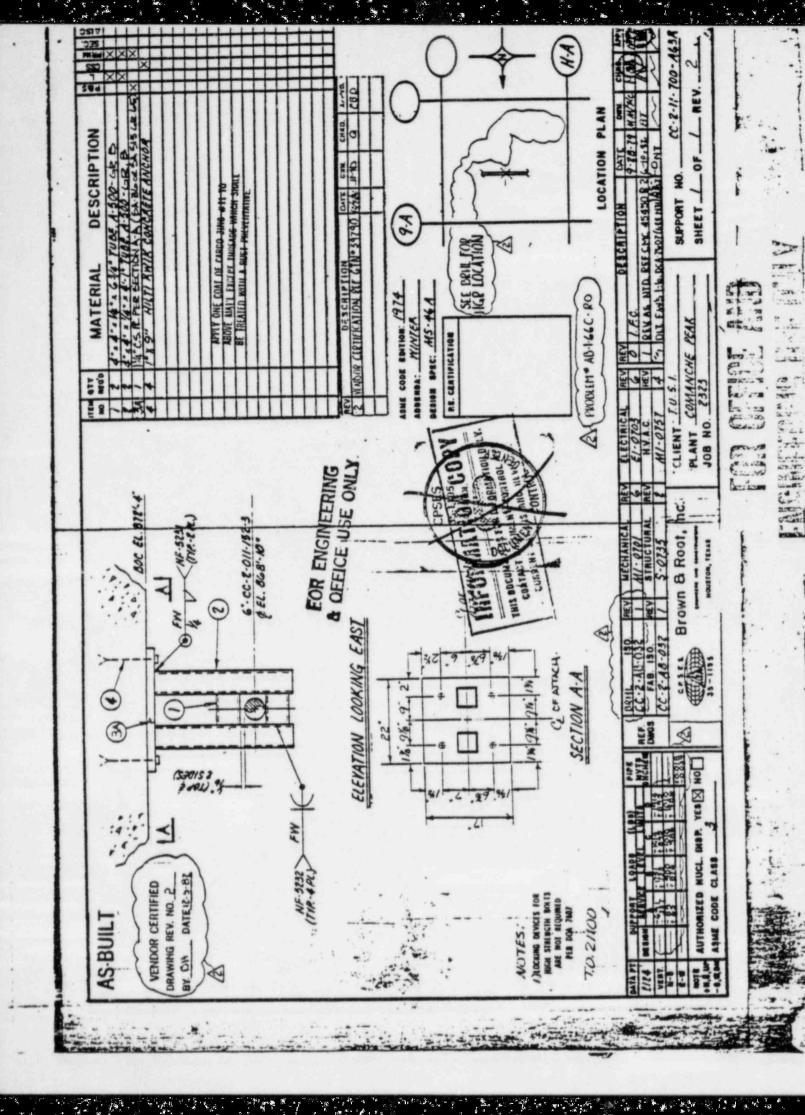


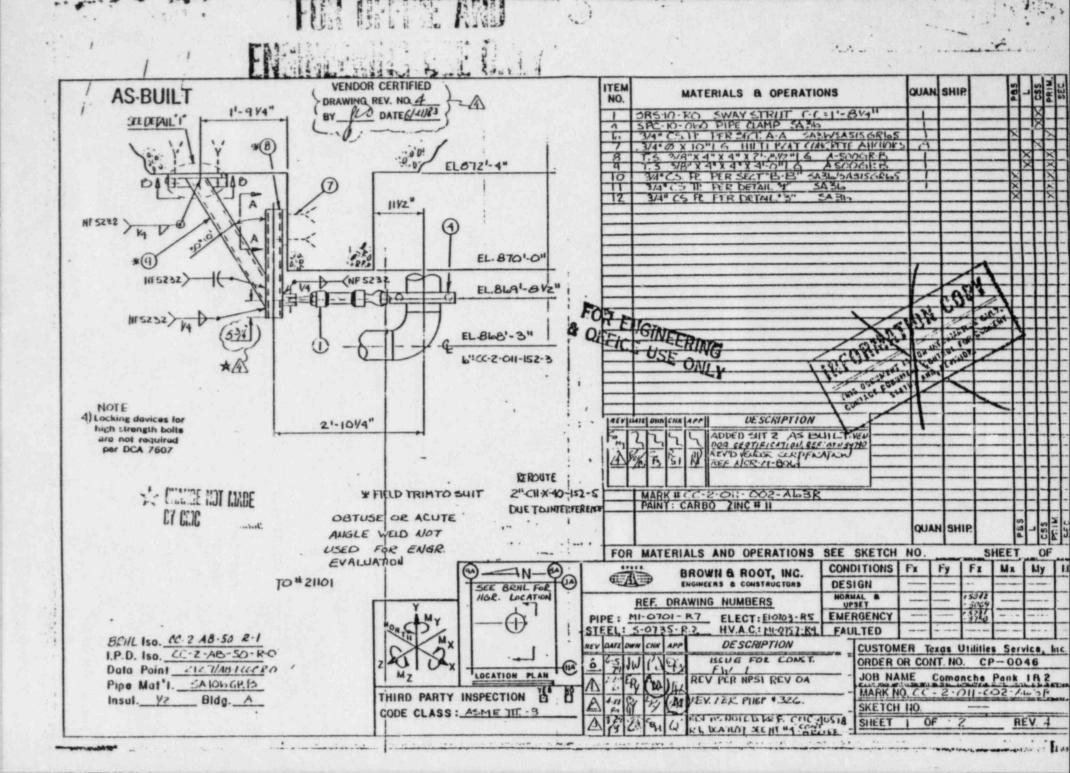
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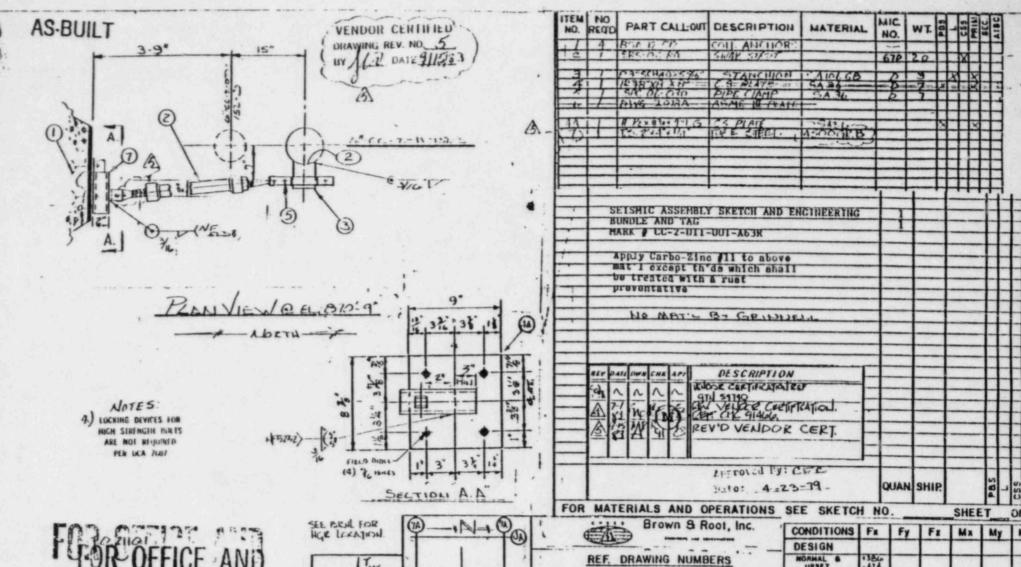












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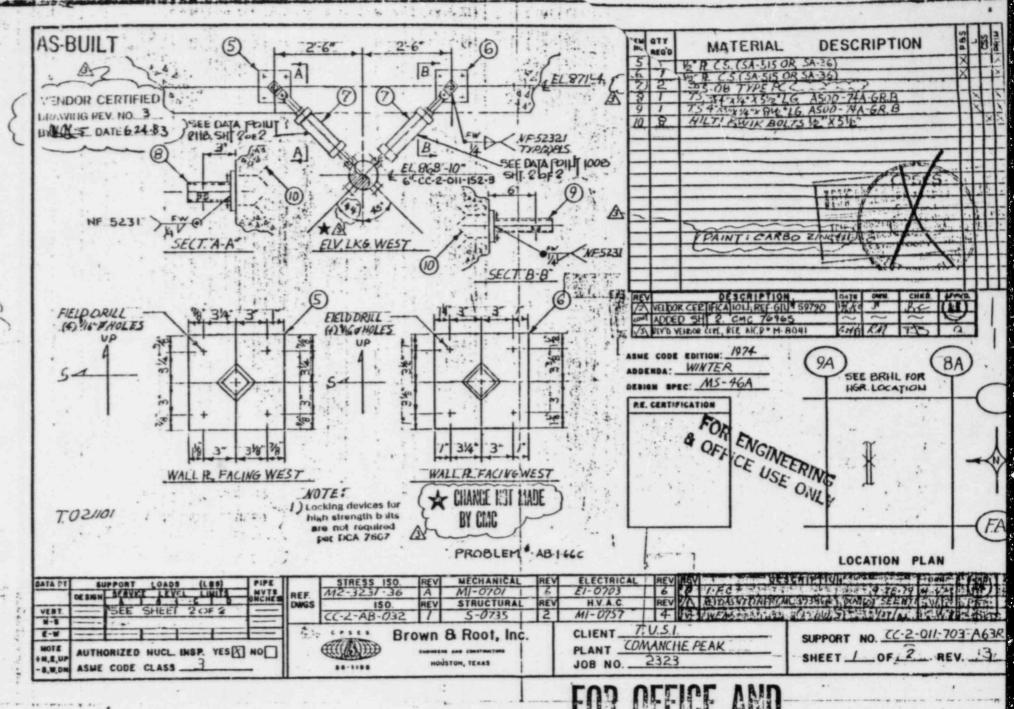
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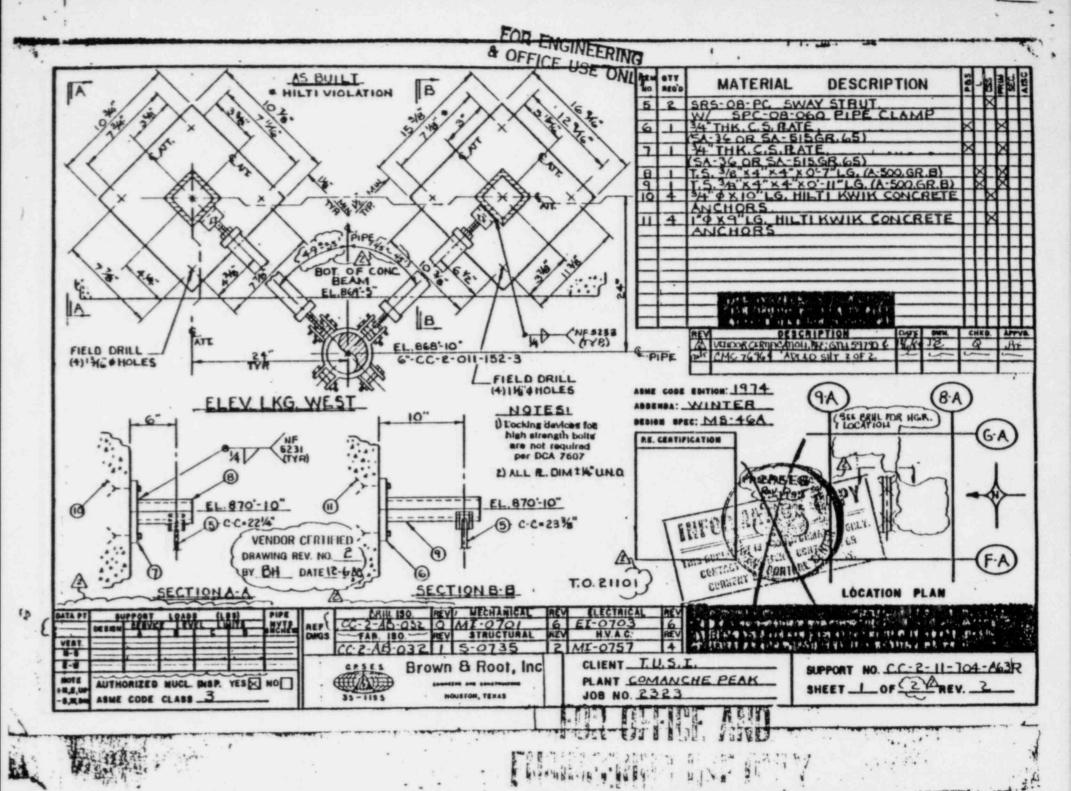


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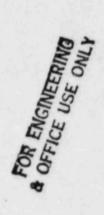
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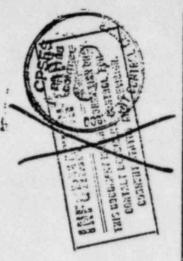
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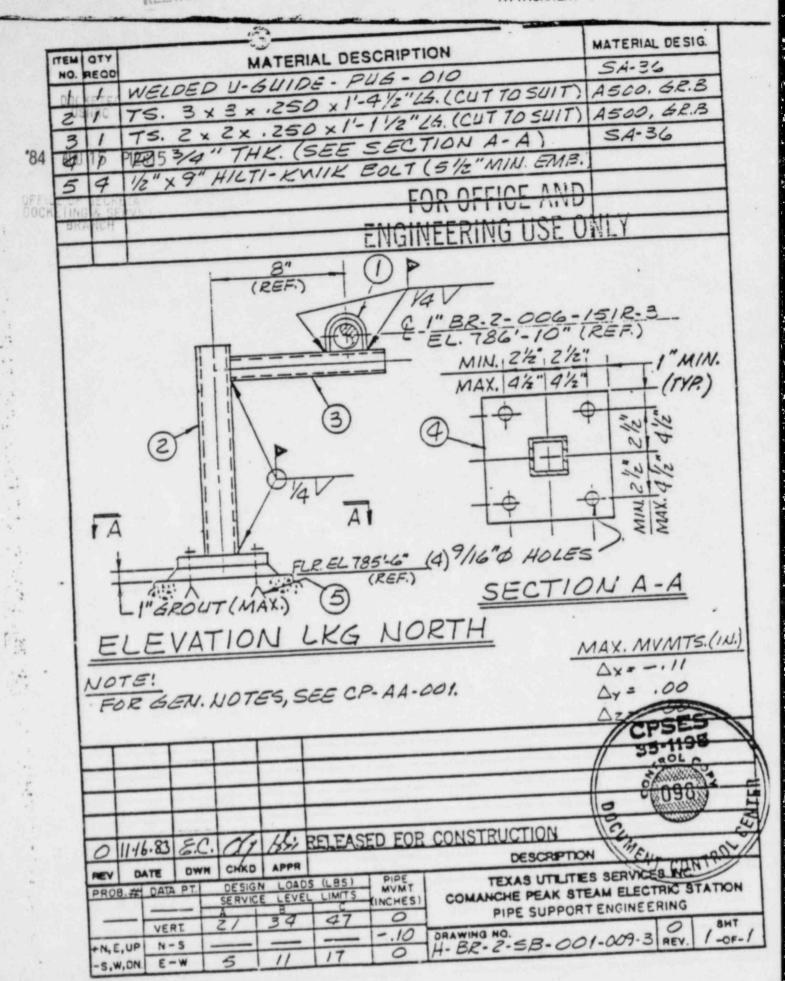
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TEXAS UTILITIES GENERATING COMPANY

RELATED CORRESPONDENCE

OFFICE MEMORANDUM

То	DODISTRIBUTION			Dallas, Texas _	March	9,	1984
Subject		Resolution o	of	QAI-0001			
*84	AGO 15 P12:15		_				

The Quality Assurance Investigation listed above has been resolved to the satisfaction of the Manager, Quality Assurance. No further action is necessary at this time. Please contact the undersigned at 214-979-8890 if there are any questions on this matter.

Thank you.

Jerry C. Walker

JCW:1n

Distribution: D. N. Chapman/QE File

D. L. Andrews/Corporate Security

Boyce Grier/CPSES QA Initiator (A. Vega)

CONFIDENTIAL

TEXAS UTILITIES GENERATING COMPANY

OFFICE MEMORANDUM

T., A. Vega	Glen Rose, Texas February 22, 1984
Subject	Investigation of Allegations
	QAI #0001

In response to your request of 12/20/83 I have investigated the allegations forwarded with QAI #0001. This is the report of my findings.

I interviewed the alleger, at his home to obtain additional information on the matters alleged in his letter to Doug Frankum. A copy of this letter is attached (Attachment A). My report of the interview is contained in Attachment B: During the interview I was given additional allegations as indicated in the interview report. These additional matters have also been investigated where practicable.

In the investigation. I interviewed two persons named by a lin his allegations—a QC inspector, and a General Foreman, by My reports of these interviews are contained in Attachment C and Attachment D. I also reviewed various procedures, records and documentation as appropriate. I have summarized the results of these activities and have developed my evaluation and conclusion for each allegation. These are discussed below.

1. Improper Marking of Hilti Bolts

in the interview was essentially the same as that contained in his letter to Frankum. It should be noted that had no first hand knowledge of this matter but was reporting what he was told. I interviewed the QC inspector named by as having received the star stamp found by the laborer, and she told me essentially the same story. She did state that the star stamp found and given to her was different from that used by QC to mark Super Hilti's and she felt if the stamp had been used the different marking would have been noticed on the Hilti. She had never noticed any evidence that the stamp was used by the craft. I interviewed the contained in to QC but he had not seen the stamp. It tated that he had no knowledge of the star stamp being used by craft personnel under his supervision.

The allegation of a star stamp being found and turned in to QC was confirmed. The allegation of it being used for improper marking of Hilti bolts was not confirmed.

2. Improper Welding

Based on additional information provided by during the interview, I visited the area and identified the pipe support in question to be

A. Vega Page 2 February 22, 1984

BR-X-056-726-A53A. A copy of the as-built drawing for this support is attached (Attachment D). I reviewed the weld records for the saddle weld in question and found everything in order. This information was the welding procedure specified in this case was WPS-18010 which provides for using "heliarc" procedure for the root and hot pass. After these is used to complete the weld. Thus completing the entire welding using "heliarc" procedure as alleged by the is not improper. This is welding was done according to the welding records. The records show the by a welder named.

The allegation that the saddle for the pipe hanger in question was welded by heliarc procedure was confirmed and the procedure used was found to was not confirmed.

3. Oversize Holes for Hilti Bolts

During the interview made an allegation regarding an oversize hole (1^{i_2}) being drilled in the floor for a 1^{i_1} Hilti bolt in a hanger base plate. Based on information provided I visited the area and identified drawing for this support is attached (Attachment F). There is nothing in the documentation package for this pine support to indicate a reports of the QC inspections for the Hilti installation for this support. These are contained in the following:

IRMH-19682. dated 7/1/81 IRMH-53200. dated 2/15/83 IRMH-53257, dated 2/22/83

These reports do not indicate any nonconforming or unsatisfactory conditions. Stated during his interview that he had no knowledge of oversize holes ever being drilled for Hilti bolts.

I made inquiry of pipe support engineering (Jay Ryan) as to whether an oversize hole for a Hilti bolt in the support in question would be of concern. I was told that it would not be a problem.

The allegation that an oversize hole had been drilled for a Hilti bolt could neither be confirmed or dismissed. It appears that physical inspection of the holes for the support in question would be the only way to resolve this matter. In view of the response from Engineering regarding the matter further.

A. Vega Page 3 February 22, 1984

4. Torqueing of Hilti Bolts in Ceiling

It is my understanding that the allegation regarding QC inspectors relying on craft personnel to check the torqueing of Hilti bolts in places where access is limited has been investigated previously. This matter has been discussed in the Licensing Hearings before the ASLB and is recorded in the transcript for September 14, 1982, on pages 4537-4539 (Attachment G). In view of this, no further investigation of this matter was made.

5. Damaged Threads on 1/2" Hilti Bolt

did not provide sufficient information on the location of this problem to enable the matter to be investigated. Since it was described as an isolated case, it does not appear that further action is warranted at this time to resolve safety concerns. Of more concern is the alleged deliberate act for fraudulent purposes.

If you have questions or comments regarding any of the above matters or if you wish me to pursue anything further, please let me know.

Loyce H. Grier

BHG/b11

Attachments: A - Letter to Frankum from

B - Interview with C - Interview with

0 - Interview with

E - Drawing BR-X-050-/20-ADJA F - Drawing CC-2-070-002-A33R

cc: D. N. Chapman Transcript pp. 4537-4539

D. L. Andrews

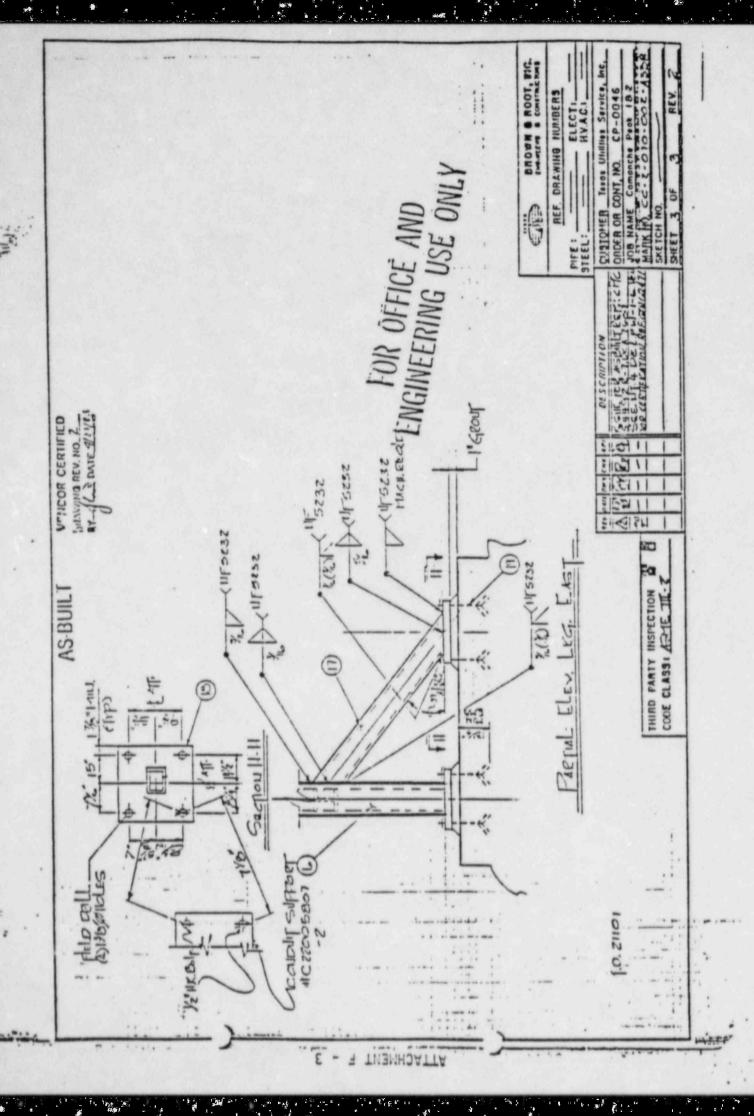
R. G. Tolson

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TEXAS UTILITIES ISSUE REV. PAGE DATE SERVICES INC. COVER SHEET 1-8-82 1 OF 1 ENGINEERING GUIDELINE TITLE 0 FOR APPROVED GUIDELINE SECTION V REVISIONS HILTI CONCRETE . ANCHOR BOLTS PSE PROJ ENGR.

I. INSTRUCTIONS FOR FILING GUIDELINE PAGES

- Remove Section V in it's entirety from the engineering manual and replace with the enclosed pages 1 thru 10.
- Place this cover sheet directly in front of page 1, Rev. 4.

II. STATUS OF GUIDELINE PAGES

PAGE	REV										
1	4	8	3								
2	5	9	3								
3	3	10	2								
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TEXAS UTILITIES SERVICES INC.

Agent For DALLAS POWER & LIGHT COMPANY TEXAS ELECTRIC SERVICE COMPANY COMANCHE PEAK S.E.S.

ALLOWABLE LOADS FOR HILTI KWIK AND SUPER HILTI KWIK BOLTS USING 4000 MI CONCRETE, S: I SAFETY FACTOR, A.A. HANKS TESTING LAS REPORT NO. 873R AND HILTI LETTER DATED OCT. 27, 1980 Y CPPA-7419 COVER LETTER

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TEXAS UTILITIES GENERATING COMPANY P. O. BOX 1002 GI.EN ROSE, TEXAS 76043

PROJECT FILE

April 19, 1934

DOCHETED

On Sugar

Cygna Energy Services 5 P12:15
101 California Street
Suite 1000
San Francisco, California 94111

Attention: Ms. Nancy Williams Project Manager OYGNA 15:

302 NO: 84042

DATE LOGGED: 5/14/80

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CROSS REF. FILE C.1. 200. Ar. (29)

COMANCHE PEAK STEAM ELECTRIC STATION

Gentlemen:

In response to your handwritten questions provided to TUGCO on March 16, 19, 20, 21 and 22, enclosed is a copy of the questions followed by TUGCO's response. Several questions are still under review and will be answered shortly. In addition, questions asked via telephone to Dave Rencher on March 30, 1984, are presently being reviewed and responses will be forwarded by April 27th.

If there are any further questions or comments, please contact me or George Grace (Site Ext. 500).

Very truly yours,

TEXAS UTILITIES GENERATING COMPANY ENGINEERING DIVISION

L. M. Popplewell

Project Engineering Manager

LMP/cp

Ditulation NHWilliams J. C. Ministrillo C. Weigart C. Weigart M. Skulman 84042 Project File (T. Acura)

A DIVISION OF TEXAS UTILITIES ELECTRIC COMPANY

working range (generally near mid-travel); a minimum ½" travel exists beyond working range limits to reach a fully extended or retracted position. For most springs, more than ½" is available. This is sufficient to account for the small seismic displacements. For box frames, the seismic movements for the supports listed were checked against the designs. In all cases, adequate clearance existed to allow combined thermal and seismic displacements.

CYGNA COMMENT:

3. In reviewing certain MS supports, CYGNA has noted instances where beams with small gaps are used to provide stability, instead of tightening U-bolts (supports MS-1-004-003-S72R, for example). In these cases, no analysis is done on the "stability bumpers." CYGNA has performed calculations which show that the load on these "supports" could be quite high, assuming one accepts the instability of this structure during dynamic loading. Has TUSI used this design for any supports with static compressive loads? Also, where is the documentation for the integrity of this support arrangement in general?

TUGCO RESPONSE:

3. The "bumpers" supplied on MS-1-004-003-S72R (in lieu of a snug U-bolt) for stability are designed to take an oscillating, momentary load (for a system at 20Hz, the applied load onto the bumpers will act less than 0.05 seconds). Hence, the nature of the cyclic load assures stability in that there is not sufficient time for a constant applied force to push the bumpers back and allow the pipe to lift up. The calculations which consider a static upward load are therefore erroneous. The stress in the bumper steel stays within its elastic limit under the impact load and hence will return to its original position when the load reverses and pushes down. This design has not been used on any supports which would experience a static compressive load. Structural acceptability of the bumpers is based on the momentary load of less than 0.05 second duration. Size of the members, welds, were judged adequate by inspection.

March 21, 1984

CYGNA COMMENT:

- 1. In reviewing MS-1-004-001-C72S, CYGNA had the following questions:
 - a) There appears to be a 7/16" flare bevel weld between items 15 and 22. This does not seem possible due to Item 34. Does TUSI have documentation conforming the size and configuration of this weld? Likewise, the weld (5/16") between 26 and 15?

b) The model uses a fixed point at the embed plates (3, 6, 12, 15 joints). Spec. 2323-SS-30, Rev. 1, requires these to be treated as pin joints, unless the embedment is stiffened. Where is the stiffener in this calc, and has structural accepted this configuration?

c) Per ASME Appendix XVII, Para. 2442, shear loads on connections with both welds and bolts must be taken by the welds alone. Item 16 is attached to Beam #21 with both welds and Hilti's. The weld sizing calculations done use the bolts to share the shear load. What is TUSI's standard practice in this type of connection? Is this weld acceptable?

d) The weight of the constant support itself is not included in the support design load for the frame. A #53 constant

weighs - 600 lb, or 5% of the design load.

What is TUSI's standard practice for spring anchorage design?

TUGCO RESPONSE:

1. (a) In the NPSI original design, 1/2" wall tube steel was used and the 7/16" flare bevel weld was possible. Modifications made at the site changed most of the steel members to 3/8" wall tube. The weld between items 15 and 22 is a flare bevel weld such that the groove is filled and ground flush to facilitate installation of Item 34. CYGNA is correct in their observation that a 7/16" flare bevel weld does not exist, the size was inadvertantly not removed during the revision process. The stiffening effect of Item 34 on this joint assures structural acceptability. The 5/16" flare bevel weld between items 26 and 15 is an acceptable weld since the tube steel thickness is 3/8" (greater than 5/16"). Documentation confirming the size of these welds is on file with QC in their inspection package. (b) See comments dated 3/22, response 1. (c) (Editorial: Items 15 and 19 are connected to beam 21, not item 16.) The connection to the beam via embedded plate (i.e., by welding) and via baseplate (i.e., by bolting) is at separate locations. As such, each is capable of resisting shear. It should be noted that Hilti joints are designed using bolt shear allowables based on ultimate test loads divided by 5. This is not the standard engineering approach to design a bearing or friction joint using code allowables for the bearing or friction condition. Using our design approach, the Hilti joints, since they are pre-torqued, would perform as a friction joint within their working loads. At ultimate loads all joints (bearing or friction) would act as bearing joints (i.e., slip would occur in the friction connection). (Following comments, in response to CYGNA's comment on TUSI's standard practice are provided here for information only). Connections of the type shown below have been used to some extent where space is limited.

Base Plate

Whilti" Bolt

Embedded Plates

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

84 M60 15 P12:15 In the Matter of }{ TEXAS UTILITIES ELECTRIC }{ Docket Nos. 50-445-1 COMPANY, et al. 11 and 50-446-1 (Comanche Peak Steam Electric 11 Station, Units 1 and 2) }{

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of CASE's 8/13/84 Answer to Applicants' Motion for Summary Disposition Regarding the Effects of Gaps on Structural Behavior Under Seismic Loading Conditions

have been sent to the names listed below this 13th day of August .1984 . by: Express Mail where indicated by * and First Class Mail elsewhere.

- * Administrative Judge Peter B. Bloch U. S. Nuclear Regulatory Commission 4350 East/West Highway, 4th Floor Bethesda, Maryland 20814
- * Ms. Ellen Ginsberg, Law Clerk U. S. Nuclear Regulatory Commission 4350 East/West Highway, 4th Floor Bethesda, Maryland 20814
- * Dr. Kenneth A. McCollom, Dean Division of Engineering, Architecture and Technology Oklahoma State University Stillwater, Oklahoma 74074
- * Dr. Walter H. Jordan 881 W. Outer Drive Oak Ridge, Tennessee 37830

- * Nicholas S. Reynolds, Esq. Bishop, Liberman, Cook, Purcell & Reynolds 1200 - 17th St., N. W. Washington, D.C.
- * Geary S. Mizuno, Esq. Office of Executive Legal Director U. S. Nuclear Regulatory Commission Maryland National Bank Bldg. - Room 10105 7735 Old Georgetown Road Bethesda, Maryland

Chairman, Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Chairman
Atomic Safety and Licensing Appeal
Board Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

John Collins
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Dr., Suite 1000
Arlington, Texas 76011

Lanny A. Sinkin 114 W. 7th, Suite 220 Austin, Texas 78701

Dr. David H. Boltz 2012 S. Polk Dallas, Texas 75224

Michael D. Spence, President Texas Utilities Generating Company Skyway Tower 400 North Olive St., L.B. 81 Dallas, Texas 75201

Docketing and Service Section (3 copies) Office of the Secretary U. S. Nuclear Regulatory Commission Washington, D. C. 20555 Renea Hicks, Esq.
Assistant Attorney General
Environmental Protection Division
Supreme Court Building
Austin, Texas 78711

(Mrs.) Juanita Ellis, President

CASE (Citizens Association for Sound Energy)

1426 S. Polk

Dallas, Texas 75224 214/946-9446