

Central file

WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

November 2, 1979

Mr. J. G. Keppler, Regional Director
Office of Inspection & Enforcement
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Keppler:

Docket 50-305
Operating License DPR-43
IE Bulletin 79-14
Seismic Analyses for As-Built Safety-Related Piping Systems

In response to the 120 day requirement of the above referenced IE Bulletin the following describes the work that has been performed and the work that is continuing pursuant to Bulletin 79-14, its supplement and subsequent revisions.

Seismic Class I safety related lines in normally inaccessible areas were inspected during the last refueling outage. This program was directly supervised in the field during inspections by WPS personnel with the assistance of Fluor Power Services (FPS), our architect/engineer. All discrepancies found during this inspection were resolved prior to unit startup following refueling with no non-conformances to design criteria having been identified in the inaccessible piping.

A completely separate program was initiated subsequent to refueling to investigate accessible Seismic Class I safety related piping systems. The inspection, designed to read and interpret the isometric prints and to note any differences between these prints and what was discovered in the field, was performed by craft labor under WPS direction. The data was then collected, tabulated and sent to FPS for evaluation. From discussions with FPS it was noted that several discrepancies might impact the seismic analysis adversely. At this point re-inspection was performed which indicated these adverse discrepancies were improperly interpreted by the original inspection team.

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An audit of approximately 20% of the accessible piping systems, and subsequent additional guidance by the NRC staff that was not issued at the time we initiated the original inspections, indicated that a re-inspection was warranted. A re-inspection program has been initiated utilizing WPS engineering personnel and the results are expected to be completed by the end of November, 1979. A follow-up report will be issued.

Very truly yours,



E. R. Mathews, Vice President
Power Supply & Engineering

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cc - Dir, Office of Inspection & Enforcement
US NRC, Washington, D. C. 20555