## PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET P.O. BOX 8699 PHILADELPHIA, PA. 19101

(215) 841-4000

Docket No. 50-277

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August 16, 1979

Mr. Boyce H. Grier Office of Inspection and Enforcement Region 1 United States Nuclear Regulatory Commission 631 Park Avenue King of Prussia, PA 19406

> SUBJECT: Specification and Documentation Deficiency for Air Operated Valves in Seismically Gualified Systems

Dear Mr. Grier:

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As part of an Engineering documentation review as riated with Bulletin 79-14, Philadelphia Electric Company has detenned that various air operated valves in seismically qualified systems were purchased without requiring seismic qualification data. Documentation of the seismic qualification of these valves is therefore not available.

The valves involved include a total of 124 air operated valves ranging in size from 2" to 3/4" in diameter. These valves serve as containment isolation valves, vent and drain lines on the HPCI & RCIC system, and emergency service water supply valves to various ECCS room coolers. Four 6" valves were also identified. These serve as emergency service water outlet valves from the diesel generators heat exchangers.

Conversation with the valve supplier indicates that similar valves have been seismically qualified for other sites by the manufacturer. The manufacturer also indicates that it is highly likely that all of the valves identified will meet seismic qualifications without modification. The valve manufacturer is WKM Division of ACF Industries.

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Mr. Boyce H. Grier August 16, 1979

The valve manufacturer has been requested to review his engineering data and determine if the valves involved have been seismically analyzed and therefore qualified. If this documentation cannot be found, a detailed analyses of each type of valve assembly will be performed to develop the required seismic qualification data. The valve manufacturer and our Engineering Department have indicated that the analysis work, if necessary, can be completed in 4 to 6 weeks. If as a result of the seismic analyses a valve is identified which does not meet the seismic criteria, appropriate reports will be made to the NRC.

Very truly yours,

Superintendent Generation Division/Nuclear