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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

September 7, 1979

Docket Nos. 50-336
50-245
50-423

Northeast Nuclear Energy Company
ATTN: Mr. W. G. Counsil
Vice President - Nuclear
Engineering and Operations
P. O. Box 270
Hartford, Connecticut 06101

Gentlemen:

The enclosed supplement to Bulletin No. 79-14 is forwarded to you to provide added guidance on the intent of the Bulletin. If you desire additional information regarding this matter, please contact this office.

Sincerely,

for Robert T. Carlson
Boyce H. Grier
Director

Enclosures:
1. Supplement 2 to IE Bulletin No. 79-14
2. List of IE Bulletins Issued in Last Six Months

cc w/encls:
K. W. Gray, Construction Quality Assurance Lead
H. R. Nims, Director of Nuclear Projects
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ENCLOSURE 1

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
WASHINGTON, D.C. 20555

IE Bulletin No. 79-14
Supplement 2
Date: September 7, 1979

SEISMIC ANALYSIS FOR AS-BUILT SAFETY-RELATED PIPING SYSTEMS

Description of Circumstances:

IE Bulletin No. 79-14 was issued on July 2, revised on July 18, and first supplemented on August 15, 1979. The bulletin requested licensees to take certain actions to verify that seismic analyses are applicable to as-built plants. Supplement 2 provides the following additional guidance with regard to implementation of the bulletin requirements:

Nonconformances

One way of satisfying the requirements of the bulletin is to inspect safety-related piping systems against the specific revisions of drawings which were used as input to the seismic analysis. Some architect-engineers (A-E) however, are recommending that their customers inspect these systems against the latest revisions of the drawings and mark them as necessary to define the as-built configuration of the systems. These drawings are then returned to the AE's offices for comparison by the analyst to the seismic analysis input. For licensees taking this approach, the seismic analyst will be the person who will identify nonconformances.

The first supplement to the bulletin provided guidance with regard to evaluation of nonconformances. That guidance is appropriate for licensees inspecting against later drawings. The licensee should assure that he is promptly notified when the AE identifies a nonconformance, that the initial engineering judgment is completed in two days and that the analytical engineering evaluation is completed in 30 days. If either the engineering judgement or the analytical engineering evaluation indicates that system operability is in jeopardy, the licensee is expected to meet the applicable technical specification action statement.

Visual Approximations

Some licensees are visually estimating pip
elements, and have not documented which da
Visual estimation of dimensions is not enc
where visual estimates are used, the accur
ance requirements. Further, in documentin
ically identify those data that were visua