



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

TIC

SEP 7 1979

Docket No. 50-358

Cincinnati Gas and Electric
Company
ATTN: Mr. Earl A. Borgmann
Vice President
Engineering Services
and Electric Production
13¹/₂ East 4th Street
Cincinnati, OH 45201

Gentlemen:

The enclosed supplement to IE 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,

James G. Keppler
James G. Keppler
Director

Enclosure: Supplement 2 to
IE Bulletin No. 79-14

cc w/encl:

Mr. J. R. Schott, Plant
Superintendent
Central Files
Director, NRR/DPM
Director, NRR/DOR
PDR
Local PDR
NSIC
TIC
Harold W. Kohn, Power
Siting Commission
Citizens Against a Radioactive
Environment
Helen W. Evans, State of Ohio

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

September 7, 1979

IE Bulletin No. 79-14
Supplement 2

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 pipe lengths and other inspection elements, and have not documented which data have been obtained. Visual estimation of dimensions is not acceptable where visual estimates are used, the accuracy of the data must meet the accuracy requirements. Further, in documenting the data, the licensee must visually identify those data that were visually estimated.

DUPLICATE DOCUMENT

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