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

SEP 7 1979

Docket No. 50-461 Docket No. 50-462

Illinois Power Company ATTN: Mr. W. C. Gerstner Executive Vice President 500 South 27th Street Decatur, IL 62525

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,

Imis & Kipplen James G. Keppler Director

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

cc w/encl: Central Files Director, NRR/DPM Director, NRR/DOR PDR Local PDR NSIC TIC Mr. Dean Hansell, Office of Assistant Attorney General

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SSINS: 6820 Accesstion No.: 7908220109

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 safetyrelated 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 elements, and have not documented which | pipe lengths and other inspection |
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| Visual estimation of dimensions is not where visual estimates are used, the a ance requirements. Further, in docume ically identify those data that were v | |
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