



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION V  
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WALNUT CREEK, CALIFORNIA 94596

PDR

August 15, 1979

Docket No. 50-312

Sacramento Municipal Utility District  
P. O. Box 15830  
Sacramento, California 95813

Attention: Mr. John J. Mattimoe  
Assistant General Manager

Gentlemen:

The enclosed supplement to Bulletin 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,

R. H. Engelken  
Director

Enclosure:  
Supplement IE Bulletin  
No. 79-14

cc w/enclosure:  
R. J. Rodriguez, SMUD  
L. G. Schwieger, SMUD

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

August 15, 1979

Supplement IE Bulletin No. 79-14

SEISMIC ANALYSIS FOR AS-BUILT SAFETY-RELATED PIPING SYSTEMS

Description of Circumstances:

IE Bulletin No. 79-14 was issued on July 2, 1979 and revised on July 18, 1979. The bulletin requested licensees to take certain actions to verify that seismic analyses are applicable to as-built plants. This supplement to the bulletin provides additional guidance and definition of Action Items 2, 3, and 4.

To comply with the requests in IE Bulletin 79-14, it will be necessary for licensees to do the following:

2. Inspect Part of the Accessible Piping

For each system selected by the licensee in accordance with Item 2 of the Bulletin, the licensee is expected to verify by physical inspection, to the extent practicable, that the inspection elements meet the acceptance criteria. In performing these inspections, the licensee is expected to use measuring techniques of sufficient accuracy to demonstrate that acceptance criteria are met. Where inspection elements important to the seismic analysis cannot be viewed because of thermal insulation or location of the piping, the licensee is expected to remove thermal insulation or provide access. Where physical inspection is not practicable, e.g., for valve weights and materials of construction, the licensee is expected to verify conformance by inspection of quality assurance records. If a nonconformance is found, the licensee is expected in accordance with Item 4 of the Bulletin to perform an evaluation of the significance of the nonconformance as rapidly as possible to determine whether or not the operability of the system might be jeopardized during a safe shutdown earthquake as defined in the Regulations. This evaluation is expected to be done in two phases involving an initial engineering judgement (within 2 days), followed by an analytical engineering evaluation (within 30 days). Where either phase of the evaluation shows that system operability is in jeopardy, the licensee is expected to meet the applicable technical specification action statement and complete the inspections required by Item 2 and 3 of the Bulletin as soon as possible. The licensee must report the results of these inspections in accordance with the requirements for content and schedule as given in Item 2 and 3 of the Bulletin.

3. Inspect Remaining Piping

The licensee is expected to inspect, as in Item 2 above, the remaining safety-related piping systems which were seismically analyzed and to report the results in accordance with the requirements for content and schedule as given in Item 3 of the Bulletin.

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4A. Evaluate Nonconformances

With regard to Item 3A for the Bulletin, the licensee is expected to include in the initial engineering judgement his justification for continued reactor operation. For the analytical engineering evaluation, the licensee is expected to perform the evaluation by using the same analytical technique used in the seismic analysis or by an alternate, less complex technique provided that the licensee can show that it is conservative.

If either part of the evaluation shows that the system may not perform its intended function during a design basis earthquake, the licensee must promptly comply with applicable action statements and reporting requirements in the Technical Specifications.

4B. Submit Nonconformance Evaluations

The licensee is expected to submit evaluations of all nonconformances and, where the licensee concludes that the seismic analysis may not be conservative, submit schedules for reanalysis in accordance with Item 4B of the Bulletin or correct the nonconformances.

4C. Correct Nonconformances

If the licensee elects to correct nonconformances, the licensee is expected to submit schedules and work descriptions in accordance with Item 4C of the Bulletin.

4D. Improve Quality Assurance

If nonconformances are identified, the licensee is expected to evaluate and improve quality assurance procedures to assure that future modifications are handled efficiently. In accordance with Item 4D of the Bulletin, the licensee is expected to revise design documents and seismic analyses in a timely manner.

The schedule for the action and reporting requirements given in the Bulletin as originally issued remains unchanged.

Approved by GAO, B180225 (R0072); clearance expires 7-31-80. Approval was given under a blanket clearance specifically for identified generic problems.

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