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TIC

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USNRC REGION II
ATLANTA, GEORGIA



Alabama Power

the southern electric system

79 SEP 7 AIO: 56

September 4, 1979

Docket No. 50-348

Mr. James P. O'Reilly
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N. W. - Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Attached is Alabama Power Company's 60-day response to
IE Bulletin 79-14 concerning Seismic Analysis of Safety Re-
lated Piping Systems.

Yours very truly,

F. L. Clayton Jr.
F. L. Clayton, Jr.

FLCjr/TNE/mmb
Attachment

cc: Mr. R. A. Thomas
Mr. G. F. Trowbridge
Office of I&E, Div. of Reactor
Operations Inspection
Washington, D. C.
Office of I&E, Div. of Construction Inspection
Washington, D. C. 20555
Mr. M. D. Hunt, I&E, Region II
Director of the Office of Inspection & Enforcement
Office of Nuclear Reactor Regulation
Washington, D. C. 20555

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Enclosure 1 - Sixty Day Response to IE Bulletin 79-14 (Unit 1)

This enclosure represents Alabama Power Company's response to the sixty day reporting requirements of the IE Bulletin No. 79-14. As indicated in Alabama Power Company's original response dated August 2, 1979, the sixty day interval report addresses the inspection of inaccessible systems within the program scope. In response to IE Bulletin No. 79-14 dated July 2, 1979 and Revision 1 dated July 18, 1979, Alabama Power Company developed, approved, and implemented on July 30, 1979 a complete program for inspection of elements affecting inputs to seismic analyses of scoped piping systems.

On August 15, 1979 the Supplement to IE Bulletin 79-14 was transmitted to Alabama Power Company which contained added guidance on required inspection items. This guidance included specific information regarding removal of piping insulation to facilitate inspection; review of quality assurance records for verification of certain inspection parameters; and requirements for providing access for inspection of physically inaccessible portions of systems.

As a part of the previously approved program, Alabama Power Company had already included provisions which addressed these issues sufficiently to ensure operability of the scoped seismic systems. Alabama Power Company has removed insulation in order to inspect twenty lugs and/or stanchions, which were chosen at random, to verify conformance to design. Based on the fact that no discrepancies were found, Alabama Power Company has concluded that the dimensions taken without insulation removal accurately reflect the as built condition of the plant against which actual input to this seismic analysis is being compared. The review of quality assurance records to verify physical inspection parameters is limited to valve drawings. Records relating to other inspection elements such as materials of construction were verified to be accurate at the time of original receipt of safety related materials by strict adherence to the site Quality Control receiving procedure. Inspection of portions of systems which are physically inaccessible or inaccessible due to high radiation levels is being performed to the extent practicable in a manner which will provide confidence that inspection elements meet appropriate acceptance criteria. An example of such inspection is the containment spray rings where time required to assemble/disassemble scaffolding to provide direct inspection is prohibited due to excessive radiation doses which would be received by workmen. In this case inspection of physical dimensions is being made utilizing surveying techniques with arrangements for distance lighting and viewing.

The inspection of inaccessible areas of the scoped systems is currently scheduled for completion during the week of September 3, 1979. To this date no nonconformance, of which only three have been identified, has been deemed to be significant based on initial engineering judgement. A thorough analytical engineering evaluation will be completed within thirty days of the inspection. It should be noted that Unit 1 is currently shutdown. As soon as the inspection of inaccessible areas is complete, Alabama Power Company will submit a description of inspection results with a schedule of corrective action if necessary with all nonconformances which affect the operability of safety systems resolved prior to the startup of Unit 1.