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UNITED STATES NUCLEAR REGULATORY COMMISSION REGION IV 611 RYAN PLAZA DRIVS, SUITE 1000 ARLINGTON, TEXAS 76012

August 15, 1979

In Reply Refer To: RIV Docket No. STN 50-482/Supplement 12 Bulletin No. 79-14

Kansas Gas & Electric Co. Attn: Mr. Glenn L. Koester Vice President-Operations Post Office Box 208 Wichita, Kansas 67201

Gentlemen:

The enclosed supplement to IE Bulletin 79-14 is forwarded to you to provide added guidance on the intent of the IE Bulletin. If you desire additional information regarding this matter, please contact this office.

> Sincerely, Rarl V. Seyfrit Director

Enclosures:

- 1. Supplement IE Bulletin No. 79-14
- List of IE Bulletins Issued in the Last Six Months

cc: w/enclosures

Messrs. Nicholas A. Petrick, SNUPPS D. T. McPhee, Kansas City Power and Light Company Gerald Charnoff, Shaw, Pittman, Potts & Trowbridge E. W. Creel, Kansas Gas and Electric Company

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

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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 o. 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 license 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 i ments for content and schedule as

