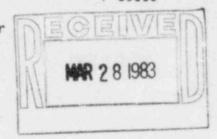


## Public Service Company of Colorado 50-261

March 21, 1983 Fort St. Vrain Unit No. 1 P-83113

Mr. John T. Collins, Regional Administrator Nuclear Regulatory Commission Region IV Office of Inspection and Enforcement 611 Ryan Plaza Drive Suite 1000 Arlington, Texas 76011



SUBJECT: Seismic Piping Redocumentation Status

REFERENCE: PSC Letter P-80380, dated 10/28/80 PSC Letter P-80442, dated 12/30/80 PSC Letter P-81019, dated 01/20/81 PSC Letter P-81172, dated 06/18/81 PSC Letter P-82004, dated 01/04/82 PSC Letter P-82174, dated 06/01/82

Dear Mr. Collins:

This is the final supplemental reply to PSC's January 20, 1981 commitment to report the status of the Fort St. Vrain Seismic Piping System Redocumentation Program on a semiannual basis. PSC's redocumentation program was established as a follow-up effort to I&E Bulletin 79-14. The basic elements of the redocumentation program consisted of drafting, quality assurance verification and analytical analysis of the as-built drawings for the Class I piping systems and seismic restraints.

In previous letters, PSC reported the completion of the drafting (P-81172) and quality assurance verification (P-82004) phases of the redocumentation program. PSC has now completed the analytical phase of the program, which involved analysis of the as-built drawings for the Class I 2 1/2" & Larger low energy piping systems and seismic supports. It also included analysis of the required Class I 2" and Under piping system and supports which interfaced with the large bore piping. The piping analysis utilized computerized analytical methods consistent with the methods previously used on the 2 1/2" and Larger high energy piping systems at Fort St. Vrain. The effort to computer analyze the low energy piping systems has provided PSC with a consistent set of seismic documentation for all 2 1/2" and Larger Class I piping systems. The results of the audit conducted per I&E Bulletin 79-14, which were verified during the quality assurance phase of the redocumentation program, indicated that the as-built configuration of the high energy piping systems was representative of the original design. Since the high energy piping systems had previously been analyzed using computerized analytical methods, PSC did not reanalyze the high energy piping systems as part of it's redocumentation program.

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The analysis of one low energy 2 1/2" and Larger Class I piping system was also excluded from the program. The liquid nitrogen system is undergoing a major modification during 1983 and the seismic adequacy of the entire system will be documented as part of the design change process for this modification.

In a letter dated September 29, 1978 (P-78159), PSC informed the NRC that PSC was conducting a program to ensure that all 2" and Under Class I piping supports were correctly documented. In January, 1981, PSC informed the NRC that much of the remaining 2" and Under analysis had to be performed in parallel with the analysis of the 2 1/2" and Larger piping. This 2" and Under analysis has been completed.

PSC is currently in the process of distributing the final drawings and analytical packages. Implementation of the remaining craft actions for both the 2 1/2" and Larger and 2" and Under piping was completed early in 1983. This effort was performed in accordance with the Seismic Redocumentation Program Procedures.

PSC considers this letter to satisfy it's commitment to report the status of the Fert St. Vrain Seismic Piping Redocumentation Program and to be the final report on this subject.

Very truly yours,

Farmence Brey

H. L. Brey, Manager Nuclear Engineering Division

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