

File

# PHILADELPHIA ELECTRIC COMPANY

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JOSEPH W. GALLAGHER  
MANAGER  
ELECTRIC PRODUCTION DEPARTMENT

(215) 841-5003

August 31, 1979

Re: Docket Nos.: 50-277  
50-278

IE Bulletin 79-14  
Revision 1  
Supplement 1

Mr. Boyce H. Grier, Director  
Office of Inspection & Enforcement  
Region I  
United States Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Grier:

This letter is our second response to IE Bulletin 79-14 which you forwarded to us on July 2, 1979, revised on July 18, 1979, and supplemented August 15, 1979, concerning seismic analyses for as-built safety-related piping systems. This letter addresses the 60-day response to Item 2 under "Action To Be Taken By Licensee".

Action To Be Taken By Licensee

2. For portions of systems which are normally accessible, inspect one system in each set of redundant systems and all nonredundant systems for conformance to the seismic analysis input information set forth in design documents. Include in the inspection: pipe run geometry; support and restraint design, locations, function and clearance (including floor and wall penetration); embedments (excluding those covered in IE Bulletin 79-02); pipe attachments; and valve and valve operator locations and weights (excluding those covered in IE Bulletin 79-04). Within 60 days of the date of this

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bulletin, submit a description of the results of this inspection. Where nonconformances are found which affect operability of any system, the licensee will expedite completion of the inspection described in Item 3.

### Response

For those portions of systems which are normally accessible, we will be unable to complete the action requested within the sixty days specified in the Bulletin. However, as of this date, we have found no obvious nonconformances between 'as-built' data and data used in seismic analyses in the approximately 12,000 feet of piping that has been inspected. We expect to complete the field inspections for Item 2 by September 15, 1979, and will issue a report by September 28, 1979, which will provide a description of the results of this inspection. The evaluation of any nonconformances will be performed as expeditiously as possible and in accordance with the requirements of the Bulletin.

In implementing the inspection program, it was determined that it would be expedient to the total inspection program to include all redundant piping in response to Item 2 of the Bulletin. The readily identifiable redundant piping for Unit 2 and Unit 3 is approximately 1600 feet, and the total footage of piping to be measured is approximately 35,000 feet. This quantity can be broken down into approximately 22,000 feet of accessible piping and 13,000 feet of inaccessible piping.

Inspection packages are being prepared by the Architect/Engineer and sent to the field as expeditiously as practicable in parallel with converting raw field data into the form that will be used to make the comparison with the seismic analysis input data. The review and evaluation of the completed 'as-built' data is already in progress and is continuing as information is available from the field. Any apparent discrepancies identified in the field are being reported by the inspection teams and resolved immediately to determine if any obvious nonconformance exists. As indicated above, no such nonconformances have been identified.

We regret that we are unable to comply with the schedule identified in the Bulletin, but we are encouraged by the field review of the inspection work already performed that the validity of the seismic analyses will be confirmed by the detailed review.

If you require any further information, please do not hesitate to contact us.

Very truly yours,

*J.W. Halligan*

cc: United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Division of Reactor Operations Inspection  
Washington, DC 20555

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