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 AUTH. NAME AUTHOR AFFILIATION
 MEDFORD, M.O. Southern California Edison Co.
 RECIP. NAME RECIPIENT AFFILIATION
 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Forward, for review & approval, proposed Rev 1 to "Snubber Reduction Program for Nuclear Piping Sys." Rev replaces original submitted on 850709, Fee paid.

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M. O. MEDFORD
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October 9, 1985

Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

References: (1) July 9, 1985 letter from M. O. Medford (SCE) to
George W. Knighton (NRC). Same Subject.
(2) August 14, 1985 letter from Reba M. Diggs (NRC) to
M. O. Medford (SCE). Same Subject.

Enclosed for your review and approval are seven (7) copies of the proposed "Snubber Reduction Program for Nuclear Piping Systems, San Onofre Nuclear Generating Station, Units 2 and 3, Revision 1," dated September 1985. This Revision 1 replaces the original document which was submitted to the NRC by reference (1) above. SCE believes that this Revision 1 is responsive to the comments made by your Messrs. H. Rood, F. Charney and M. Hartzman in the telephone conversations with our Messrs D. Cox and D. Mercurio on August 1, 1985 and on August 21, 1985 between your Mr. M. Hartzman and our Mr. D. Mercurio and SCE consultant Mr. D. Munson.

The Revision 1 changes to the Snubber Reduction Program Plan are summarized as follows:

1. Section 3.2.1 ASME Class 1, 2 and 3 Pipe Supports

Clarification is provided that both thermal anchor motion and seismic anchor motion will be considered as primary loads for the pipe supports which is consistent with past design practice.

2. Section 3.2.3 Auxiliary Steel

For auxiliary steel whose design load increases, a check is added

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for angle members and limits on the use of Standard Review Plan Section 3.8.4 stress allowables are provided.

3. Section 4.1 Response Spectra Method

The option of using the uniform response spectra analysis method has been added.

4. Section 4.1.3 Combination of Group Responses for Independent Support Motion (ISM)

SCE commits to combine the group results by the absolute sum method when the ISM option is used. However, SCE's position is that combination of group results by the square root of the sum of squares (SRSS) method is sufficiently conservative and provides more accurate results than combining them by the absolute sum method. Therefore, SCE hereby reserves the right to apply to combine the group results using the SRSS method when the necessary results from the currently ongoing Brookhaven Laboratory study on ISM using PVRC damping values are available.

Using the criteria and methodology in the enclosed Snubber Reduction Program, Revision 1, SCE is planning to reanalyze the safety related plant piping systems less than thirty (30) inches in diameter and the control element drive mechanisms (CEDM's) with the intent of significantly reducing the number of safety related snubbers in the plant. Removal of unnecessary snubbers would result in increased reliability of piping systems, and reduce maintenance and surveillance requirements and reduce personnel radiation exposure.

This Southern California Edison proposal to limit the use of snubbers is consistent with the following recommendations from NUREG-1061 "Report of the U.S. Nuclear Regulatory Commission Piping Review Committee" Section 5.2.3:

For improving overall reliability of piping systems, the use of snubbers to meet piping system design requirements should be limited. The Committee believes that a non-mandatory "snubber reassessment" program for all plants should be initiated and that the nuclear industry should be encouraged to develop methods and procedures to limit the use of snubbers.

Please contact Mr. T. D. Mercurio (818)302-2645) if you have any additional questions or comments. In addition, SCE is prepared to meet with you and your technical staff to provide any clarification or answer any questions you may have. Your acceptance of the proposed program is requested by November 8, 1985 so that SCE may proceed with the analysis on a reasonable schedule.

In response to reference (2), enclosed is a check for the \$150 application fee for review and approval of the proposed Snubber Reduction Program. It is understood that SCE will be billed later for additional costs for the review of this proposed program in accordance with 10 CFR 170.12(c) and 170.21.

Very truly yours,

A handwritten signature in cursive script, appearing to read "M O Medford".

Enclosure

cc: H. Rood (U.S. Nuclear Regulatory Commission, SONGS 2/3 Project Manager)
F. R. Huey (NRC Senior Resident Inspector)