

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8212150073 DOC. DATE: 82/12/08 NOTARIZED: NO DOCKET #
 FACIL: 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co. 05000269
 50-270 Oconee Nuclear Station, Unit 2, Duke Power Co. 05000270
 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287

AUTH. NAME AUTHOR AFFILIATION
 TUCKER, H.B. Duke Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director
 STOLZ, J.F. Operating Reactors Branch 4

SUBJECT: Requests clarification of conditional snubber operability as described in certain Tech Specs. Request due to discussion in IE Insp Repts 50-269/82-37, 50-270/82-37 & 50-287/82-37.

DISTRIBUTION CODE: A001S COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3
 TITLE: OR Submittal: General Distribution

NOTES: AEOD/Ornstein: 1cy. 05000269
 AEOD/Ornstein: 1cy. 05000270
 AEOD/Ornstein: 1cy. 05000287

RECIPIENT ID CODE/NAME		COPIES LTTR ENCL		RECIPIENT ID CODE/NAME		COPIES LTTR ENCL	
NRR ORB4 BC 01		7	7				
INTERNAL: ELD/HDS4		1	0	NRR/DL DIR		1	1
NRR/DL/ORAB		1	0	NRR/DSI/RAB		1	1
REG FILE 04		1	1	RGN2		1	1
EXTERNAL: ACRS 09		6	6	LPDR 03		1	1
NRC PDR 02		1	1	NSIC 05		1	1
NTIS		1	1				
NOTES:		1	1				

DUKE POWER COMPANY

P.O. BOX 33189
CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

December 8, 1982

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch No. 4

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

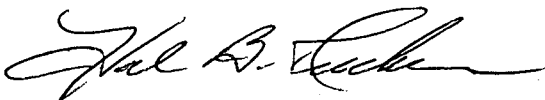
Dear Sir:

The purpose of this letter is to seek clarification of conditional snubber operability as described in certain Duke Power Technical Specifications. In Oconee Nuclear Station IE Inspection Report 50-269, -270, -287/82-37, the inspector, E. H. Brooks, discussed a previous unresolved item, (270/80-11-02), concerning operability of three snubbers with empty reservoirs and uncovered fluid ports. He wrote that Duke Power "has revised their technical specifications to permit functional testing of empty snubbers to determine operability and corresponding changes to snubber inspection schedule. The licensee was advised at the exit interview that it is the position of NRC that empty snubbers with fluid ports uncovered are considered inoperable and increased inspection frequency as indicated by technical specifications apply." Duke Power agrees that an empty snubber, one where the snubber itself is void of any oil, is considered inoperable. Both Oconee and McGuire Technical Specifications address uncovered fluid ports of hydraulic snubbers that appear inoperable as a result of visual inspection and state that the snubber shall be specifically tested for operability. The snubber is functionally tested and if the test produces successful results (the snubber is not empty and is operable), the snubber may be considered operable.

Attached are parts of Oconee Nuclear Station Technical Specification 4.18.1.(3)(b), and the McGuire Nuclear Station Technical Specification 4.7.8.(b), that discuss the steps to be taken when a hydraulic snubber fluid port is found uncovered and the snubber appears to be inoperable as a result of visual inspection.

Unless informed to the contrary, Duke Power considers that this position is acceptable to the NRC and that no further regulatory actions in this area are warranted.

Very truly yours,



Hal B. Tucker

JCP/php
Attachment

8212150073 821208
PDR ADOCK 05000269
P PDR

A001

Mr. Harold R. Denton, Director
December 8, 1982
Page 2

cc: Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Mr. W. T. Orders
NRC Resident Inspector
Oconee Nuclear Station

Mr. Philip C. Wagner
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attachment

Taken from Oconee Nuclear Station Technical Specification 4.18.1.(3)(b)

Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specification 4.18.4. However, when the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be tested by starting with the piston at the as found setting and extending the piston rod in the tension mode direction. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

Taken from McGuire Nuclear Station Technical Specification 4.7.B.(b)

Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specifications 4.7.8.d or 4.7.8.e, as applicable. Hydraulic snubbers which have uncovered fluid ports shall be tested by starting with the piston at the as found setting and extending the piston rod in the tension mode direction. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.