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 SORENSEN, G.C. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 SCHWENCER, A. Licensing Branch 2

SUBJECT: Presents method to be used to fulfill Tech Spec requirement
 of performing first inservice visual insp of all snubbers.
 Only snubbers on safety-related sys subj to thermal cycling
 of 250 F need be reinspected.

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Washington Public Power Supply System

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November 3, 1983
G02-83-1011

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Schwencer:

Subject: NUCLEAR PROJECT NO. 2
WNP-2 SAFETY-RELATED SNUBBER TESTING

References: 1) WNP-2 Technical Specification; LCO 3/4.7.4,
Snubbers
2) WNP-2 Preservice Component Support Program Plan

The purpose of this correspondence is to present the method the Supply System will employ to fulfill the technical specification requirement of performing the first inservice visual inspection of all snubbers after 4 months but within 10 months of commencing power operation (Reference 1).

The intent of requiring the first visual inspection prior to the normal frequency of 18 months is not specifically addressed in the technical specification bases section (Reference 1). Since a BWR Preservice Inspection Program is most often completed during cold conditions, snubbers would not be initially inspected following a hot condition until the first refueling outage. The Supply System believes the intent of the requirement is to verify snubber integrity early in first cycle after heatup but late enough to provide for some operational thermal transients.

The manner in which the requirement is presented in Reference 1 requires:

1. That all snubbers scoped within the ISI Program be inspected, and
2. That the inspection take place no earlier than 4 months and no later than 10 months after commencing power operation.

The WNP-2 Power Ascension Test Program (PATP) subjects the plant to numerous plant thermal and operational transients and many more than anticipated to occur post PATP or during a 10 month period of commercial power operation.

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A. Schwencer
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WNP-2 SAFETY-RELATED SNUBBER TESTING

Reference 2) provides for inspecting all safety-related snubbers in the cold condition as part of our PSI Program and on selected systems that heatup above 250°F during the PATP. The plant will, as a minimum, be subjected to three complete thermal cycles in addition to various planned transients prior to the inspection taking place. The timing of the inspection is presently scheduled to be approximately 4 1/2 months following initial criticality.

Our position, as presented in Reference 2, is that only snubbers on safety-related systems subject to thermal cycling above 250°F need be re-inspected and that the present PATP schedule satisfies the 4 to 10 month requirement.

Reference 2) and a discussion of the 4 to 10 month inspection requirement has previously been sent to the Commission on July 8, 1983 (Letter No. G02-83-611). The purpose of the letter was to present a proposed revision to LCO 3/4.7.4. The LCO has been revised by the Commission a number of times since then and our proposal was not reviewed or responded to since it represented a review of an outdated revision. In conclusion, this is a position previously discussed with Commission representatives.

The Supply System will continue with the implementation of the Preservice Inspection Program Plan as presented and apply the Reference 2 interpretation unless otherwise informed by the Commission. Should you have additional questions, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,



G. C. Sorensen, Acting Manager
Nuclear Safety and Regulatory Programs

MRW/tmh

cc: R Auluck - NRC
WS Chin - BPA
D Hoffman - NRC
AD Toth - NRC Site

