

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
THE HARTFORD ELECTRIC LIGHT COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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July 15, 1981

Docket No. 50-336  
A01413



Director of Nuclear Reactor Regulation  
Attn: Mr. Robert A. Clark, Chief  
Operating Reactors Branch #3  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

- References:
- (1) D. G. Eisenhower letter to All Power Reactor Licensees (Except SEP Licensees), dated November 20, 1980.
  - (2) W. G. Counsil letter to D. G. Eisenhower, dated March 13, 1981.
  - (3) W. G. Counsil letter to R. Reid, dated January 8, 1979.

Gentlemen:

Millstone Nuclear Power Station, Unit No 2  
Technical Specification Revisions for  
Snubber Surveillance

In Reference (1), the NRC Staff requested that Northeast Nuclear Energy Company (NNECO) propose Technical Specifications for the inservice surveillance of snubbers at Millstone Unit No. 2.

Due to efforts required to respond to I&E Bulletin No. 81-01, Mechanical Snubber Surveillance, NNECO informed the Staff, in Reference (2), that additional time would be required to prepare the license amendment application requested by Reference (1). NNECO documented its intention to propose Technical Specifications for the inservice inspection of snubbers at Millstone Unit No. 2 on or about July 1, 1981.

In fulfillment of that commitment, pursuant to 10CFR50.90, NNECO hereby proposes to amend its operating license, DPR-65, by incorporating the following revisions into the Millstone Unit No. 2 Technical Specifications:

Revise Section 3/4.7.8, Snubbers, and Table 3.7-1 as shown in Attachment 1.

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The proposed changes incorporate modified Standard Technical Specification pages for snubbers, as provided in Reference (1), into the Millstone Unit No. 2 Technical Specifications. The Reference (1) model Technical Specification pages have been modified to accommodate plant specific conditions. Justification for the deviations are discussed below. In addition, NNECO has incorporated previously proposed changes, applied for in Reference (3), into this license amendment application. As requested by Reference (1), NNECO has included a new Table 3.7-1b which lists the safety related mechanical snubbers in use at Millstone Unit No. 2. NNECO has included in proposed Tables 3.7-1a, Hydraulic Snubbers, and 3.7-1b, Mechanical Snubbers, the appropriate Action Statements and Modes of Operation for each safety related snubber. This deviation from the Reference (1) model Technical Specifications is discussed fully in Reference (3).

The snubber visual inspection schedule is included in Table 4.7-3 of the Millstone Unit No. 2 Technical Specifications. As the Plant has been in commercial operation for over five years, the wording requiring visual inspections after four (4) months but within ten (10) months from commencement of power operation has been deleted.

For the purposes of visual inspections, NNECO proposes to divide the snubbers at Millstone Unit No. 2 into two groups: mechanical and hydraulic. Each group is further subdivided into accessible and inaccessible subgroups. The grouping by snubber type and accessibility meets the intent of the model Technical Specifications and provides for additional clarification for the required visual surveillances. Since the visual inspection criterion are different for mechanical and hydraulic snubbers, the two snubber types must be treated separately for the purposes of visual inspections.

The visual inspection acceptance criterion in Model Specification 4.7.9.b has been modified as described in the proposed Specification 4.7.8.1.b to clarify the intent of the visual inspections. Proposed Specification 4.7.8.1.b reflects two (2) distinct categories for visual acceptance of a snubber: (1) snubbers which exhibit visual indications of impaired OPERABILITY, and (2) snubber locations which exhibit visual indications of detachment from foundations or supporting structures which in no way effect actual snubber operability. NNECO has not included a requirement to manually induce movement of a snubber without disconnecting the snubber. The results of such "twist" tests were determined to be invalid and without merit during the recent snubber inspections mandated by I&E Bulletin No. 81-01.

NNECO has not proposed to include words within the Technical Specifications visual inspection criterion that contain an inordinate amount of detail which is more appropriately provided for in surveillance procedures. Specifically, the verbiage referring to the failure of a hydraulic snubber due to the lack of a cover on the fluid port was deleted. This level of detail is more appropriately contained in surveillance procedures. It is noted that current procedures require that hydraulic snubbers whose fluid port is not covered be declared inoperable.

Snubber testing will be performed on a representative sample consisting of 10% of each type of snubber, mechanical or hydraulic, in use at Millstone Unit No. 2. The statistical sampling criteria defined in the model Technical Specifications has been deleted. This criterion is applicable to a total snubber population of greater than or equal to five hundred ( $\geq 500$ ). As Millstone Unit No. 2 utilizes much fewer than 500 snubbers, this Specification does not apply and the representative sample defined as 10% of each type of snubber (mechanical or hydraulic) is adequate.

The requirement to choose at least 25% of the snubbers in the representative sample from the three categories listed in Section 4.7.9.c of the model Specifications has been deleted. Based on the results of inspections and analytical efforts required to respond to I&E Bulletin No. 81-01, NNECO has determined that the snubbers included in the three categories listed in model Specification 4.7.9.c do not necessarily represent those snubbers which are the most crucial to safety or more susceptible to damage or impaired operability. To determine the relative importance of each snubber or the susceptibility of failure of a snubber in a particular location would require a detailed, case by case analysis assuming a variety of failure modes. This is clearly not the intent of the Specifications and would otherwise negate the concept of a random sample. The deletion of this requirement is judged not to compromise the safety of the plant.

Snubbers have not been categorized into various groups by operating environments. This task would be extremely difficult, if not impossible, to accomplish particularly in inaccessible areas of the Plant. The enhanced surveillance requirements incorporating a representative sample of snubbers in use at the Plant ensures an increased inspection frequency for all snubbers than has previously been realized.

NNECO proposes to reserve the option to exempt from functional testing those snubbers identified as "Especially Difficult to Remove" or in "High Radiation Zones during Shutdown." This option would only be exercised in severe cases where the snubbers would require disassembly or where excessive radiation exposure would be incurred to remove the snubber. In such instances, the snubber would have previously been demonstrated OPERABLE. In addition, NNECO has incorporated in proposed Specification 4.7.8.1c the requirement to retest those snubbers in locations where snubbers had previously failed functional tests due to environmental or operational conditions. This will ensure that snubbers installed in potentially adverse locations will be surveilled more frequently. Inoperable snubbers repaired and returned to service will be functionally tested on a random basis. Additional surveillance frequencies are not required since any repaired snubber is rebuilt and tested prior to reinstallation in the Plant. Vendor certification as to the acceptability of the snubber for continued operation accompanies any rebuilt snubber. NNECO considers a rebuilt snubber equivalent to a new unit and surveillance over and above the required random sampling is excessively conservative.

NNECO has modified model Technical Specification Section 3.7.9.d.2, Hydraulic Snubbers Functional Test Acceptance Criteria, to reflect actual snubber operation. Snubbers specifically required not to displace under continuous load are not utilized, nor are they planned for future use at Millstone Unit No. 2.

NNECO intends to verify that the mechanical snubbers listed in Table 3.7-1b have freedom of movement over their full range of compression and tension. Specification 4.7.9.e has been modified accordingly. Additional functional testing of mechanical snubbers will be performed upon the availability of testing equipment on-site. As such, model Specifications 4.7.9.e does not apply.

Model Technical Specification 4.7.9.f is not proposed. This requirement is fulfilled by current Technical Specification 6.10.2.h which requires the maintenance of records of inservice inspections performed pursuant to Technical Specifications.

The Reference (1) model Technical Specification Bases have also been modified slightly to support the proposed Technical Specification 3/4.7.8, Snubbers.

The proposed Technical Specifications included in Attachment 1 incorporate all applicable positions of the model Technical Specifications provided in Reference (1). Modifications to the Reference (1) model Specifications were necessitated to enhance the overall clarity of the proposed Technical Specifications, however, the original intent of the Staff has not been altered. NNECO has determined that the proposed Technical Specifications for snubber surveillance provides an assurance of safety equivalent to that of the Reference (1) model. The overall intent of the Staff to provide increased surveillance requirements for snubbers, particularly the addition of the safety-related mechanical snubbers, and to upgrade inspection techniques has been accomplished by the attached proposed Technical Specification.

The above proposed changes have been reviewed pursuant to 10CFR50.59 and have not been found to constitute an unreviewed safety question.

The Millstone Unit No. 2 Nuclear Review Board has reviewed and approved the above proposed changes, and has concurred in the above determination.

NNECO has reviewed the above proposed license amendment pursuant to the requirements of 10CFR170, and has determined that the proposal constitutes a Class 3 amendment. The basis for this determination is that the proposal involves a single safety issue which does not involve a significant hazards consideration. NNECO has previously remitted \$4000 (four thousand dollars) with Reference (3) for a similar, pending license amendment application. The changes proposed in Reference (3) have been incorporated herein and are of the same subject matter. As such, payment of an additional Class 3 amendment fee would be superfluous.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Council

W. G. Council  
Senior Vice President

John P. Cagnetta

By: J. P. Cagnetta  
Vice President Nuclear and  
Environmental Engineering



STATE OF CONNECTICUT )  
 ) ss. Berlin  
COUNTY OF HARTFORD )

*July 15, 1981*

Then personally appeared before me J. P. Cagnetta, who being duly sworn, did state that he is Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensees herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

*Shirley M. Oates*  
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Notary Public

My Commission Expires March 31, 1986