

## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Point Beach, Unit 2										DOCKET NUMBER (2) 0 5 0 0 0 3 0 1										PAGE (3) 1 OF 0 2																													
TITLE (4) Snubber Removed Prior to Technical Specification Change																																																	
EVENT DATE (5) MONTH DAY YEAR 0 2 2 3 8 4									LER NUMBER (6) YEAR SEQUENTIAL NUMBER REVISION NUMBER 8 4 - 0 0 1 - 0 0									REPORT DATE (7) MONTH DAY YEAR 0 3 1 5 8 4									OTHER FACILITIES INVOLVED (8) FACILITY NAMES DOCKET NUMBER(S) 0 5 0 0 0																						
OPERATING MODE (9) N										THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more of the following) (11)																																							
POWER LEVEL (10) 1 0 0										20.402(b) 20.406(a)(1)(i) 20.406(a)(1)(ii) 20.406(a)(1)(iii) 20.406(a)(1)(iv) 20.406(a)(1)(v)										20.406(c) 50.36(a)(1) 50.36(a)(2) 50.73(a)(2)(i) 50.73(a)(2)(ii) 50.73(a)(2)(iii)										50.73(a)(2)(iv) 50.73(a)(2)(v) 50.73(a)(2)(vi) 50.73(a)(2)(vii)(A) 50.73(a)(2)(vii)(B) 50.73(a)(2)(ix)										73.71(b) 73.71(c) OTHER (Specify in Abstract below and in Text, NRC Form 366A)									
LICENSEE CONTACT FOR THIS LER (12) NAME C. W. Fay																														TELEPHONE NUMBER AREA CODE 4 1 4 2 7 7 - 2 8 1 1																			
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																																																	
CAUSE SYSTEM COMPONENT MANUFACTURER REPORTABLE TO NPDs										CAUSE SYSTEM COMPONENT MANUFACTURER REPORTABLE TO NPDs																																							
A A B S N B G 2 5 5 No																																																	
SUPPLEMENTAL REPORT EXPECTED (14) YES (If yes, complete EXPECTED SUBMISSION DATE) NO																														EXPECTED SUBMISSION DATE (15) MONTH DAY YEAR																			

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

The pipe snubber in location ID No. 2HS-M75 as listed in Technical Specification Table 15.3.13-1 was removed prior to obtaining a Technical Specification change to allow its removal. The snubber was reinstalled within 72 hours of the event date to satisfy the limiting condition of operation specified in Technical Specification 15.3.13.2. The snubber had been removed as part of a major modification to the pressurizer relief valve piping supports based on reanalysis required by NUREG-0737. At no time was the system in an unsafe or unanalyzed condition. A Technical Specification change to delete the snubber has been initiated.

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## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED GMB NO 3150-0104

EXPIRES 8/31/85

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Point Beach, Unit 2	0 15 0 0 0 3 0 1	8 4	- 0 0 1	- 0 0 0 2	OF	0 2	

TEXT (If more space is required, use additional NRC Form 366A's) (17)

The pipe snubber in location ID No. 2HS-M75, as listed in Technical Specification Table 15.3.13-1, was removed during the 1983 refueling outage ending 07/06/83 as part of a major modification of the pressurizer relief valve discharge piping supports. This modification was based on analysis of the piping performed in response to NUREG-0737, Item II.D.1, to ensure relief valve operation would not overstress the piping.

On 02/23/84, it was recognized that removal of the snubber was not in strict compliance with Technical Specification 15.3.13 because the Technical Specifications had not been changed to allow removal of the snubber. An evaluation was subsequently performed which verified the acceptability of reinstalling the snubber. The snubber was reinstalled prior to the 72-hour time limitation of Technical Specification 15.3.13.2 for reactor operation with an inoperable snubber.

When the modification request was approved, it was understood that no snubbers would require removal and, therefore, the Technical Specification changes could be made after completion of the modification to both units. In the course of the modification, it was determined by analysis that the snubber in location ID No. 2HS-M75 was no longer required and it was removed. The design engineer overlooked the requirement for the Technical Specifications to be revised prior to plant operation with the snubber removed and proceeded without obtaining additional review and approval of the modification required by administrative procedure.

Correspondence which directed removal of the snubber was distributed to plant management but used a snubber location ID number different from the Technical Specification ID number and delayed recognition of the problem. The snubber location had been renumbered to be consistent with the numbering of other snubber locations when new isometric piping drawings were developed as part of the IE Bulletin No. 79-14 program for reanalysis and modification of safety-related systems' pipe supports. These drawings had been only recently issued and because the 79-14 work was only recently completed, the Technical Specification location ID numbers had not yet been changed to match those on the drawings.

Although this event constitutes a Technical Specification violation, it is important to recognize that no unsafe or unanalyzed condition ever existed. The pipe support modifications improved the integrity of the pressurizer relief piping and reinstallation of the snubber in location ID No. 2HS-M75 was performed only to satisfy the legal technicalities of the Technical Specifications.

This event has heightened the awareness of personnel to ensure strict compliance with Technical Specifications when modifications are performed. A Technical Specification change is being requested to delete the snubber and to include additional snubbers installed on safety-related piping as part of the relief piping support modification and the IE Bulletin No. 79-14 program. No further corrective action is deemed necessary.



**Wisconsin Electric** POWER COMPANY  
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

Dmb

March 15, 1984

Mr. J. G. Keppler, Regional Administrator  
Office of Inspection and Enforcement,  
Region III  
U. S. NUCLEAR REGULATORY COMMISSION  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

DOCKET NO. 50-301  
LICENSEE EVENT REPORT NO. 84-001-00  
PIPE SNUBBER REMOVAL  
PRIOR TO TECHNICAL SPECIFICATION CHANGE  
POINT BEACH NUCLEAR PLANT, UNIT 2

Enclosed is Licensee Event Report No. 84-001-00 which provides a description of an event reportable in accordance with 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications; ...".

Very truly yours,

Vice President-Nuclear Power

C. W. Fay

Enclosure

Copy to Resident Inspector

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