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(Reg. Guide)

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Subject: Draft Regulatory Guide and Value/Impact Statement "Qualification And Acceptance Tests For Snubbers Used In Systems Important To Safety" Task SC 708-4.

Dear Sir:

Commonwealth Edison Company has reviewed the subject proposed Regulatory Guide. Attached are specific comments resulting from our review. In our judgement, it is important to empnasize major concerns with the Draft Value/Impact Statement and the proposed Implementation of the Guide.

The Draft Value/Impact Statement for the subject Regulatory Guide lists six (6) items to describe the "Need for Proposed Action". As discussed in our detailed comments, only one of the items appears to be a valid and objective reason--that is reason number 1. By definition, this Regulatory Guide will establish uniform criteria. If uniform criteria established by this regulatory guide were consistent with pending nuclear industry standards, the impact of this guide would be minimal. Since this guide is intended to apply primarily to future applications for Construction Permits, we recommend delaying further activities until the industry standard is completed. This delay would have no disadvantage since no new construction permit applications are anticipated in the near future, and this delay has the potential advantage of minimizing the impact of this Regulatory Guide by making it more consistent with the standard and freeing NRC manpower from this task. We encourage you to review the pending industry standard prior to further activity on this Regulatory Guide.

The "Implementation" sectio of the subject proposed Guide specifies implementation primarily fo ew Construction Permit Applications. In addition, the staff ecommends application of the guide as the method for correcting snubber deficiencies identified in plants in operation and plants under construction. This indirect "backfitting" of the Guide is inappropriate and without objective basis. It is inappropriate because it presumes the corrective measures can be defined prior to identifying any snubber deficiency. In the event of a snubber deficiency, the corrective

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measures should and will be determined based on the nature of the deficiency. If the snubber deficiency can be corrected by replacing "O ring" seals, it is clearly inappropriate to replace an entire class of snubbers with completely new snubbers. There is no objective basis for "backfitting" this Guide. No evidence is presented to demonstrate that the present methods for evaluating and correcting snubber deficiencies have been ineffective. We object to these backfit provisions in the "Implementation" section of this Guide, and encourage deletion of these requirements from the guides. If, in a specific case, the NRC staff finds backfitting this guide appropriate, it can be done without these rigid requirements in the Guide.

Specific comments on the subject Regulatory Guide are attached. We appreciate having been given the opportunity to comment.

Very truly yours,

J. S. Abel
Director of Nuclear
Licensing

Commonwealth Edison Company's Comments on
Draft Regulatory Guide And Value/Impact Statement
"Qualification And Acceptance Tests For Snubbers Used
In Systems Important To Safety" Task SC 708-4

Section B.1

Quote from proposed guide: "Recent operating histories of nuclear power plants indicate the emergence of numerous inoperative snubber units (Reference 1)".

Reference 1 (1) to this guide is a document that reports on a survey of snubber failures during the period from 1973 through 1975, over five years ago. This survey can not have taken into the account the changes in snubber designs (2) currently used in nuclear power plants and is an inadequate basis for issuing a Regulatory Guide of this scope. In fact, the Regulatory Guide is aimed toward qualification of present generation snubber designs and excludes those that were being manufactured for use in the plants surveyed in 1973 through 1975. This makes no sense. The data base does not support the concept of snubber qualification testing.

(1) ORNL/NUREG/TM-53 (October 14, 1976) "Analysis of Abnormalities of Snubbers in Nuclear Reactor Service".

(2) Specifically the industry's change from hydraulic to mechanical snubbers.

Section D
Implementation

Part 8, "Conclusions", of the Draft Value/Impact Statement specifically states that this is a "forward fit" application. This section covers more than forward fit, and is essentially a backfit application and should be treated as such.

Appendix B
Paragraph 3.2

What is the significance of the last sentence? The rationale seems to be that if a snubber is tested successfully, then it is no good for use in a plant. Also, why restrict use "for functions important to safety." If testing has some adverse affect on snubbers, why install them anywhere.

Appendix B
Paragraph 3.3.b

"Traceability of the Material for a Snubber". This item will run the cost of snubbers up considerably, probably two to three times. If a manufacturer has a good track record plus an acceptable QA program, this requirement should not be necessary.

Appendix B Paragraph 3.5	"Aging Simulation Requirements". This is a desirable goal but it appears to be another instance of a requirement where there is not a proven method. The only true one is the real one of forty years of service. Current inservice surveillance programs will identify and correct deterioration due to aging.
Appendix B Paragraph 3.11	The last paragraph states revision to the design must be made before the new design can be qualified. This section deals with failure of the snubber design based on test results and assumes that failure in any of the areas listed (a to g) are directly related to design. This assumption leaves no room for determination that failure was due to defective material or manufacturing error which are not a problem related to design. How does this relate to Par. 4.3 and Par. 4.4
Appendix C General	The way this Regulatory Guide is drafted, Appendix B and Appendix C require two separate test programs to first qualify the design and secondly qualify production models. However, Appendix B (Qualification of Design) permits selection of snubbers from the production line (Par. 3.2) and it is not clear why testing required for Appendix B and Appendix C cannot be combined. In the Draft Value/Impact Statement, Par. 3.2.3(6), appears to recognize the combination of design and production qualification. This should be recognized in Appendices B & C.
Appendix C Paragraph 3.2	In the second line, it appears that the word "design" or "functional" should precede the word "specification." Otherwise, as stated, what does "the specification" allude to. This may be a problem throughout the Draft Regluatory Guide. In Appendix A, reference is made to Design Specification and Functional Specification whereas, in may instances the Regulatory Guide merely refers to "specification" in the text without specifying what type (e.g., general, design, functional, etc.)
Draft/Value Impact Statement	Section 1.2 "Need for Proposed Action" 1. No comment. 2. There is not basis for this statement. It is a subjective assessment made by the Staff. It is difficult to believe that the public confidence is undermined by the inoperability of snubbers during 1973 to 1975.

3. There is no basis for this statement. The staff has presented neither technical nor statistical arguments that justify the hope that the frequency of inservice inspections would be reduced nor has the Staff presented any arguments that the reduction in occupational exposure would be apparent if indeed the frequency of inspections were reduced. Furthermore, there is no basis for an argument that any lowered occupational exposure is worth the economic cost of qualification testing.

4. Staff reviewers need not spend time looking at snubber application. This is a design function.

5. The study cited in this paragraph is, again, outdated.

6. Bases for Inservice Surveillance acceptance criteria consistent with the snubber original design basis can be developed without this guide.

We conclude that the staff has not presented sufficient justification of the need for action.

Section 2.1 "NRC"

1. There is no evidence presented in this guide that increased safety will result from the issuance of this "guidance" over that obtained from inservice testing.

2. The licensing process will be slowed in almost every instance, as it has been with qualification of Class 1E electrical equipment.

3. Insight cannot be developed by issuance of a Regulatory Guide.

Section 2.3.1 "Applicants and Licensees"

Quote from Regulatory Guide: "In the short term, problems and costs for licensees could result if new snubbers similar to existing snubbers fail in qualification tests."

Problems and costs will result regardless of the results of the testing program. The mere imposition of qualification testing on the vendors increases costs due to the direct costs of the snubbers to be supplied and the indirect costs associated with the delay in snubber shipment. These costs are very high, particularly for plants under construction.

Quote: "Substantial Savings of plant maintenance costs are anticipated because operating reactors will be able to spend less time on inservice inspection owing to the improved quality and reliability of new snubbers employed".

The NRC Staff is already anticipating that present snubber designs will fail qualification testing. This would present a substantial cost to the industry. However, if the assumption is made that present snubber designs will not fail during qualification testing, there is no basis for assuming that maintenance costs will decrease as a result of qualification testing.

Section 2.3.2 "Manufacturers"

The impact is significant on a manufacturer if a present design snubber fails qualification testing, simply from the cost of replacing that snubber in all applications. There are not many qualified (i.e. Q.A.) snubber manufacturers. The impact of this Regulatory Guide could force some to leave the nuclear market altogether, an impact the nuclear industry can ill afford to absorb.

Section 2.3.4 "Public"

There is no evidence that qualification testing will increase overall plant safety. There is even less evidence that it will increase confidence in nuclear power plants.

We feel implementation of this Regulatory Guide, in its present form, could hypothetically result in ultimately replacing all 4,500 snubbers procured for use at our Braidwood Station. We estimate the following expenses in 1981 dollars involved in this hypothetical replacement effort.

1. Replacement cost of 4,500 snubbers - 7.5 million

2. Cost of qualifying new design of 7 difference size snubbers in use $700,000 per Regulatory Guide estimate.

3. Cost of removal of old and installation of new snubbers - $3.5 million.

Total projected cost $11.7 million

Conclusions:

There is no technical, economic, nor safety issue presented in the proposed Regulatory Guide that provides an adequate basis for its issuance. The data used for snubber failure occurrence is outdated and, furthermore, the Guide does not address those failures. The economic impact from testing costs, snubber costs, potential snubber replacement costs, delay costs and the potential cost of snubber manufacturers leaving the nuclear market place is in no way mitigated by the hoped for reduction in cost in the plant maintenance areas. There is absolutely no evidence that the small number of snubber failures compromises the safety of operating nuclear plants. Furthermore, snubber qualification testing will not increase public confidence in the construction and operation of nuclear power plants. Indeed, it may have just the opposite effect, if taken to an equally illogical conclusion. We feel this Regulatory Guide should not be issued in its present form.