PAUL-MUNROE
Energy Products

Mail to: P.O. Box 5900
Orange, CA 92667

1701 West Sequoia Avenue
Orange, CA 92668
Telex 69-2387
Telecopier (714) 978-0840
(714) 978-9600

29 August 1985

Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Seal and Fluid Maintenance of Anker-Holth equipment snubbers.

Reference: Letter from R. Fisher of Paul-Munroe to Owners of Anker-Holth Snubbers, dated 29 August 1985.

Dear Mr. DeYoung,

During a recent N.R.C. vendor audit at the Paul-Munroe facility in Orange California, potential maintenance issues with regard to Anker-Holth snubbers were identified. In particular, the Anker-Holth Technical Instruction Manuals do not clearly specify a maintenance program that is, at this time, consistent with current industry standards for snubber seals or fluids. To rectify this situation, Paul-Munroe will first inform the owners of Anker-Holth snubbers that these potential problems exist and then revise the Technical Instruction Manuals to include specific procedures for seal and fluid maintenance.

Included with this letter is a copy of the notification which has been transmitted to the owners of Anker-Holth Snubbers.

If there are any questions regarding our action on this matter, please do not hesitate to contact me at (714) 978-9600.

Very truly yours,

PAUL-MUNROE INCORPORATED
Energy Products Division

Richard C. Fisher

Richard C. Fisher
Director of Engineering

cc: Mr. Robert L. Pettis
U.S. Nuclear Regulatory Commission

RCF:kcd
0144K

8509090198 850829
PDR ADOCK 05000244
S PDR

IE21 ? No code should it be IE19

Attachment

PAUL-MUNROE
Energy Products

Mail to: P.O. Box 5900
Orange, CA 92667

1701 West Sequoia Avenue
Orange, CA 92668
Telex 69-2387
Telecopier (714) 978-0840
(714) 978-9600

29 August 1985

Dear Sirs:

This letter is to notify the owners of Anker-Holth snubbers of the possibility that seal and fluid degradation may occur in these snubbers over extended periods of time. The Technical Maintenance Instructions provided by Anker-Holth at the time of snubber delivery has been determined to be inconsistent with what now appears to be prudent maintenance procedures for seals and fluids. Paul-Munroe will submit revisions to the Anker-Holth manuals in the near future. A description of these forthcoming changes is provided below.

Seal Life - The Anker-Holth Technical Instruction Manuals define the seal service life in terms of cumulative radiation exposure. Experience shows degradation of EPR or Viton A seals occurring faster than the OEM recommended seal service life due to other aging mechanisms such as compression set and temperature. The Anker-Holth Technical Instruction Manuals will be revised to recommend a nominal seal service life of 5 years.

Reservoir Fluid Levels - The Anker-Holth Technical Instruction Manuals provide inconsistent instructions on the checking of reservoir fluid levels. The Anker-Holth Technical Instruction Manual will be revised to recommend that the reservoir be checked during each refueling outage.

Fluid Quality - The Anker-Holth Technical Instruction Manuals provide no fluid quality guidelines or sampling intervals for Silicone base fluids. The Anker-Holth Technical Instruction Manuals will be revised to recommend the following fluid quality guidelines and sampling intervals:

PAUL-MUNROE

- o Fluid Cleanliness
  - oo New fluid cleanliness level - SAE Class 4 or better
  - oo Cleanliness level at 5 years - SAE Class 6 or better
  - oo Sample frequency, quantity, and measurement techniques will be specified
- o Fluid Viscosity
  - oo 150 - 200 centistokes at 75°F ± 15°F
- o Fluid Water Content
  - oo New fluid water content - less than or equal to 100 ppm
  - oo Water content at specified sampling intervals - less than or equal to 150 ppm
  - oo Water content test method - Karl Fisher method
- o Radiation exposure check - no evidence of coagulation

Snubbers that have received the Paul-Munroe Tefzel seal upgrade along with new Technical Instruction Manuals are exempt from the concerns identified above. If there are any questions regarding this matter, please do not hesitate to contact me at (714) 978-9600.

Very truly yours,

PAUL-MUNROE INCORPORATED
Energy Products Division

Richard C. Fisher
Director of Engineering

cc: Richard C. DeYoung, Director
Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission

Robert L. Pettis, Inspector
Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission

RCF:kcd
0145K

Portland General Electric Company
121 S.W. Salmon Street
Portland, Oregon 97204

Attention Roger Weihage

Portland General Electric Company
121 S.W. Salmon Street
Portland, Oregon 97204

Attention Arlen Wogen

Carolina Power & Light
H.B. Robinson S.E.G. Plant
P.O. Box 790
Hartsville, S.C. 29550

Attention Warren Farmer
Inservice Inspection Engineer

GPU Nuclear Corporation
TMI Unit 1
P.O. Box 480
Route 441 South
Middletown, PA 17057

Attention Peter Snyder
Preventative Maintenance Engineering

GPU Nuclear Corporation
TMI Unit 1
P.O. Box 480
Route 441 South
Middletown, PA 17057

Attention John Pearce
Site Maintenance Engineering

Rochester Gas and Electric Co.
Robert E. Ginna Power Station
1503 Lake Road
Ontario, New York 14519

Attention Jerry Schuler
Maintenance Manager

American Electric Power
1 Riverside Plaza
P.O. Box 16631
Columbus, OH 43216-6631

Attention Kas Santos, Senior Engineer
Mechanical Engineering Division

Wisconsin Public Service Corp.
P.O. Box 48
Kewaunee, Wisconsin 54216

Attention Roger Lange
Maintenance Supervisor

Wisconsin Public Service Corp.
P.O. Box 48
Kewaunee, Wisconsin 54216

Attention Ken Weinhauer
Nuclear Services Supervisor (Downtown)

Florida Power Corporation
3201 34th Street South
P.O. Box 14042
St. Petersburg, Florida 33733

Attention Joe Masada
Nuclear Project Engineer

Wisconsin Electric Power Co.
231 W. Michigan Street
P.O. Box 2046
Milwaukee, Wisconsin 53201

Attention Bill Herrman
Maintenance Supervisor
Point Beach Site

Northern States Power
Prairie Island
R.R. #2
Welch, MN 55089

Attention Gerry Gore
Maintenance Engineer

Arkansas Power and Light Co.
P.O. Box 551
Little Rock, Arkansas 72203

Attention Mark Browning

Wisconsin Public Service Corporation
700 North Adams Street
Green Bay, Wisconsin 54301