

November 13, 1985

DMB 016

Dockets Nos. 50-277
and 50-278

Mr. John S. Kemper
Vice President, Engineering and Research
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Dear Mr. Kemper:

SUBJECT: USE OF ENERGY ABSORBERS AS REPLACEMENT FOR SNUBBERS

Re: Peach Bottom Atomic Power Station, Units 2 and 3

By letter dated July 25, 1985, the Philadelphia Electric Company (PECo or the licensee) provided to the staff certain information concerning the use of energy absorbers to reduce the use of snubbers at Peach Bottom, Units 2 and 3. Your letter represents a follow-up to a meeting held on May 30, 1985 during which PECO and the Bechtel Corporation provided a technical presentation on energy absorbers to the NRC staff (Meeting Summary dated July 24, 1985).

In your July 25, 1985 letter, there is mention of the possibility of installing energy absorbers at Peach Bottom under the provisions of 10 CFR 50.59(a). To this point, we wish to make the following comments based upon a limited review of the technical bases for the use of energy absorbers as snubber replacements provided in your July 25, 1985 letter:

1. Elimination of snubbers and replacement with energy absorbers would involve a change in the Technical Specifications in the opinion of the NRC staff.
2. The number and location of the energy absorbers in a given piping system would be determined by the use of a non-linear computer program together with the structural hysteretic properties of the absorbers. Neither of these features have been reviewed in detail by the staff and found to be acceptable.
3. The proposed replacement of snubbers with energy absorbers in a previously analyzed safety system could result in a potential decrease in the margin of safety. The reanalysis and verification of adequate safety margins concerning snubber replacement represent a potential unreviewed safety question in the opinion of the NRC staff.

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Mr. John S. Kemper

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This completes our response to certain questions raised during the May 30, 1985 meeting as well as your July 25, 1985 letter.

If you have any further questions, please contact your NRR Project Manager, G. Gears (301-492-8362).

Sincerely,

*ORIGINAL SIGNED BY
JOHN F. STOLZ*

John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing

cc: See next page

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OELD *11/20 legal objection although*
L Finkelskin could be more specific.
11/13/85

Mr. E. G. Bauer, Jr.
Philadelphia Electric Company

Peach Bottom Atomic Power Station,
Units 2 and 3

cc:

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