



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO THE FUNCTIONAL TESTING OF SNUBBERS

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 & 2

DOCKET NOS. 50-325/324

TAC NOS. 63786 AND 63787

INTRODUCTION

By letter dated August 19, 1987, Carolina Power & Light Company (CP&L), the licensee for Brunswick Steam Electric Plant (BSEP), Units 1 & 2, submitted a request to modify their existing plan for functional testing of snubbers. Currently, they have been testing all snubbers in accordance with the first sampling plan of Technical Specification 4.7.5. CP&L is proposing the use of two different sampling plans for safety and nonsafety-related snubbers.

EVALUATION

Snubber functional testing requirements are currently covered under existing Technical Specification 4.7.5. This permits the option of utilizing any one of three different sampling and sample expansion programs. It is a requirement of this Technical Specification that "The NRC Regional Administrator shall be notified in writing of the sample plan selected prior to the test period or the sample plan used in the prior test period shall be implemented." Therefore, unless the Regional Administrator is notified, Brunswick would have to continue testing according to the first sampling plan.

The first sampling plan permitted under Technical Specification 4.7.5 is in accordance with Section XI, paragraph IWF-5400(b) of the ASME Code and requires that 10% of the total population of snubbers be functionally tested each refueling period. If a failure is detected in this sample, an additional 10% sample must be tested. Testing continues in 10% sample increments until a sample with no test failures is reached.

As a result of the scope of Inservice Inspection (ISI) boundaries, certain nonsafety-related snubbers (e.g., Class 2 Main Steam) fall under the scope of IWF-5000 testing requirements. Thus, under Section XI requirements, a test failure of nonsafety-related snubbers would result in additional testing of safety-related snubbers. This increase in testing could have a potential impact on man-rem exposure, with no commensurate increase in safety.

CP&L proposed the establishment of two separate and independent snubber groups. Group I consists of those nonsafety-related snubbers subject to testing because of the extent of ISI boundaries. These will be tested in accordance with Section XI, IWF-5000. A test failure of a Group I snubber will not affect Group II testing. Group II consists of safety-related snubbers. These snubbers will be tested in accordance with the third optional plan allowed within Technical Specification 4.7.5 requirements.

CONCLUSION

The NRC staff has reviewed the proposed functional testing plan for snubbers at BSEP and finds it is acceptable since it complies with the requirements of Technical Specification 4.7.5. The requested relief is not needed to implement the testing plan, because the plan meets the requirements of Section XI of the ASME Code.

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Dated: March 2, 1988