

June 23, 2003

Mr. Donald Hoffman  
Excel Services Corporation  
Suite 100  
11921 Rockville Pike  
Rockville, MD 20852

SUBJECT: June 16, 2003: SUMMARY OF MEETING WITH INDUSTRY ON SNUBBERS IN  
TECHNICAL SPECIFICATIONS

Dear Mr. Hoffman:

The purpose of this letter is to transmit the summary of a meeting with representatives of Excel Services, TSTF, and SNUG. The meeting was held at the U.S. Nuclear Regulatory Commission offices in Rockville, Maryland, on June 16, 2003.

Sincerely,

*/RA/*

Stewart L. Magruder, Acting Section Chief  
Technical Specifications Section  
Operating Reactor Improvements Program  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Enclosures:

1. Meeting Summary
2. Attendance List
3. Agenda
4. Draft Revision 4 of TSTF 372

cc w/encl:

N. Chapman, BECHTEL SEARCH  
S. Wideman, Wolf Creek Generating Station  
M. Shutt, Duke Energy / SNUG  
D. Hoffman, EXCEL

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TSS Staff	NSaltos (NTS)	FMReinhart (FMR)
AJHLee (AJL)	SLMagruder (SLM1)	KManoly (KAM)

ADAMS ACCESSION NUMBER:

**Package - ML031710267    Summary - ML031710235    Enclosure 4 - ML031710824**

OFFICE	TSS:RORP:DRIP	ASC:TSS:RORP:DRIP		
NAME	KKavanagh	SMagruder		
DATE	06/23/2003	06/23/2003		

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## SUMMARY OF THE JUNE 16, 2003, NRC/INDUSTRY MEETING ON SNUBBERS IN TECHNICAL SPECIFICATIONS

The NRC staff met with representatives of Excel Services, Technical Specification Task Force (TSTF), and SNUG on June 16, 2003, from 2:00 p.m. to 4:00 p.m. The meeting attendees are listed in Enclosure 2.

As stated in the agenda (Enclosure 3), the purpose of the meeting was to discuss the status of TSTF 372 with regards to snubbers in technical specifications. The representatives from industry presented their perspective of the history of snubbers in technical specifications and the ramifications of the relocation of snubbers out of technical specifications. In order to address these issues, the industry developed TSTF 372, "Addition of LCO 3.0.8, Inoperability of Snubbers," and submitted TSTF 372 for staff review on April 6, 2001 (ADAMS Accession Number ML011080060). By letter dated January 6, 2002 (ADAMS Accession Number ML020110076), the industry submitted TSTF-372 Revision 1. The staff closed out the review of TSTF 372 Revision 1 and provided alternate wording to the proposed LCO 3.0.8 by letter dated December 13, 2002 (ADAMS Accession Number ML023500029). The staff has been working with industry on draft revisions of TSTF 372. Draft TSTF 372 Revision 4 (Enclosure 4) was discussed at the meeting.

The industry has three concerns related to draft TSTF 372 Revision 4. The concerns were expressed as follows:

1. A list of snubbers for which proposed LCO 3.0.8.b may be applied is required to be listed in the Bases in the current draft TSTF.
2. The type of evaluation required with the license amendment request for snubbers for which LCO 3.0.8.b may be applied.
3. The industry wants to add the phrase "or other seismic restraints" to the proposed snubber LCO.

In response to these concerns, it was agreed that the list of snubbers (which includes the description of the snubber, the supported system, and the applicable Mode or other condition specified in the Applicability) for which proposed LCO 3.0.8.b may be applied could be in the Bases, UFSAR, TRM or any licensee controlled document controlled under the auspices of 10 CFR 50.59. In addition, the staff stated that there are several options for evaluating the operability of snubbers and their supported systems. These include 1) an engineering analysis of all snubbers; 2) performance of snubber maintenance within the time allotted for LCO 3.0.3, generally 7 hours; or 3) recognize that certain snubbers (e.g., that affect the operability of multiple trains) need to be reviewed on a case by case basis, generally by a risk analysis. The analysis that supports proposed LCO 3.0.8.b can be a bounding analysis or a margins analysis but must be submitted with the license amendment request. The basis for the addition of the phrase "or other seismic restraints" will be reviewed by the Division of Engineering when TSTF 372 is again submitted for staff review.

NRC/INDUSTRY MEETING ON SNUBBERS  
IN TECHNICAL SPECIFICATIONS ATTENDANCE LIST  
June 16, 2003

<u>NAME</u>	<u>AFFILIATION</u>
DONALD HOFFMAN	TSTF/EXCEL SERVICES
MARK SHUTT	DUKE ENERGY/SNUG
STEVE WIDEMAN	WOLF CREEK / TSTF
NANCY CHAPMAN	SERCH/BECHTEL
BILL BECKNER	NRC/NRR/DRIP/RORP
STU MAGRUDER	NRC/NRR/DRIP/RORP/TSS
KERRI KAVANAGH	NRC/NRR/DRIP/RORP/TSS
BOB TJADER	NRC/NRR/DRIP/RORP/TSS
NICK SALTOS	NRC/NRR/DSSA/SPSB
ARNOLD LEE	NRC/NRR/DE/EMEB

Enclosure 2

# **AGENDA**

## TSTF-372 Meeting

June 16, 2003 from 2:00 PM to 4:00 PM, in O-14 B10

- Status of TSTF-372, "Addition of LCO 3.0.8, Inoperability of Snubbers"
- Public Questions and Discussion
- Closing Comments