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Docket No. 50-247

1973

Consolidated Edison Company of
New York, Inc.
ATTN: Mr. William J. Cahill, Jr.
Vice President
4 Irving Place
New York, New York 10003

NOV 8 1973

Gentlemen:

Inspections of hydraulic shock suppressors (snubbers) as required by RO Bulletin 73-3 revealed that a large percentage of the seals in Bergen-Patterson (B-P) units were defective. Reinspections in compliance with RO Bulletin 73-4 have indicated that defects can recur in 6 weeks' time.

Two different seal materials have been used in Bergen-Patterson snubbers; a millable gum polyurethane which contains plasticizers and other additives and a molded polyurethane known to be free of these additives. Based on limited available information it is postulated that dissolving of the plasticizer into the silicone hydraulic fluid has caused seal shrinkage and deterioration. Therefore, millable gum polyurethane should not be used in hydraulic snubbers, except on an emergency basis.

The performance and reliability of unadulterated molded polyurethane in a reactor environment has not yet been established. Test data indicate that an incompatibility also exists between molded polyurethane and the silicone fluid which may limit the inservice life of the molded material. The use of molded polyurethane seals should, therefore, be considered only as an interim measure until more data is available or an improved material is established.

Based on the above considerations, we are requiring the following actions, additional to those required by RO Bulletin 73-4, be taken on all snubbers installed on safety related systems.

1. B-P Snubbers Inaccessible During Reactor Operations

During the reinspections required by RO Bulletin 73-4, replace seal material in all B-P snubbers inaccessible during reactor operation with material that has been demonstrated to be compatible with the hydraulic fluid in the operating environment. If such material is unavailable, the use of molded polyurethane

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known to be free of additives will be acceptable as an interim measure. Reinspect these snubbers whenever the reactor is shutdown for 24 hours or longer and these snubbers have not been inspected for 30 days, but in no event shall the interval between inspections exceed 120 days. Any defective units found during each inspection shall be repaired before returning to power operation. If unavailability of materials prevents changing the seal material in all inaccessible snubbers or dictates the use of millable gum seals, only defective units need be repaired. Under these conditions, reinspect every 30 days until compatible seal material is installed, which should be accomplished at the earliest practical time.

If the shutdown for the reinspections required by RO Bulletin 73-4 has been completed and the plant returned to power operation prior to receipt of this letter, the replacement of seals shall be performed the next time the reactor is shutdown for 24 hours or longer, but within 120 days of the shutdown/reinspection performed in accordance with RO Bulletin 73-4.

2. B-P Snubbers Accessible During Reactor Operation

Repair any defective snubbers that are accessible during reactor operation as outlined in 1 above. Reinspect all accessible snubbers every 30 days or less and repair defective units as needed.

3. Snubbers Manufactured by Vendors Other than B-P

During the required inspections of B-P snubbers, inspect all snubbers supplied by manufacturers other than Bergen-Patterson.

4. Reporting Requirements

Report the results of all inspections and any repairs or corrective action taken to the Directorate of Licensing within 15 days after the inspection. These reports shall indicate the manufacturer and numbers of snubbers inspected, identification of defective units, and corrective action taken, including specific description of materials used in making any repairs. These reports shall indicate the temperature and radiation environment at full power of each snubber inspected.

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Bergen-Patterson is coordinating a development program to determine a long-term solution to the current snubber problem. Based on the results of this program, the results of your reinspections, and any other pertinent information available, submit to the Directorate of Licensing at an appropriate time, but within 1 year, your proposed program to improve snubber service life and reliability and proposed changes to your Technical Specifications for a surveillance program for the snubbers in your facility.

Please contact us if you have any questions concerning these additional requirements.

Sincerely,

R. C. DeYoung, Assistant Director
for Pressurized Water Reactors
Directorate of Licensing

cc:
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