

NRR-PMDAPEm Resource

From: Feintuch, Karl
Sent: Thursday, May 19, 2011 8:39 AM
To: 'thomas.l.breene@dom.com'; 'jack.gazala@dom.com'
Cc: Bedi, Gurjendra; McMurtray, Anthony
Subject: ME4722 - Sampling Schemes Discussion

Reviewer Bedi has responded to the Kewaunee understanding of the selection process for Large Bore Snubbers for testing:

===== begin NRC understanding =====

NRC staff has the following understanding of the same text of OMa-1988, Section 3.2.3.1.a as you quoted:

For the first sample lot tested, 10% of the snubbers in the general population shall be selected. As far as practical, this sample selected for testing shall include the various designs, configurations, operating environments, range or sizes, and capacity of snubbers, etc. The first sample lots tested shall be a composite based on the ratio of each particular category to the total numbers of snubbers installed in the plant. Sample lot selection from the representative categories of snubbers shall be random.

As acknowledged, KPS has a total of 99 snubbers installed onsite that are subject to this Code requirement (2 of these 99 are the SG large bore hydraulic snubbers). Further, these 99 snubbers were randomly assigned into 9 groups per the Code requirement .

However, NRC staff believes that the KPS selection of snubbers to populate the 9 groups from the total of 99 snubbers, must be based on the various attributes of design, configuration, environment , ranges or sizes, and capacity.

Without knowing the details (size, design, location, capacity etc.) of all of the 99 snubbers at KPS, NRC staff believes that there are only two large bore hydraulic snubbers which are SG large bore hydraulic snubbers (LBHSs), each with a capacity of 900 KIPs. If there are no other large bore snubbers, these two snubbers will form a single group (out of 9 groups).

During the 10% sampling process, one SG large bore snubber needs to be selected from this group.

Therefore, for every 10% sampling process, there will be **one SG snubbers selected** for sample testing. Applying the NRC's understanding of OMa-1988 leads to a different result than the understanding that KPS applies.

Additional information pertaining to snubber testing:

- (1) Please note that the statistical method only provides a confidence that applies to the population as a whole in the absence of testing each snubber. By using this sampling method, the NRC staff has observed for some plants that some of the snubbers were tested few times in their expected life of 40 years while some snubbers were never tested at all. Therefore, based on snubber aging study process, in the NUREG/CR-5870, Results of LWR Snubber Aging Research," dated May 1992, the NRC recommended the Service Life Monitoring (SLM) of snubbers in addition to the statistical testing process. Most of the plants have included SLM in their TS, TRM etc. in the past. The ASME OM Code, Subsection ISTD also included SLM along with snubbers examination and inservice testing requirements.
- (2) NRC Generic Issue 113, "Dynamic Qualification and Testing of Large-Bore Hydraulic Snubbers (LBHSs)," recommended that plants should (1) establish a separate ISI/IST LBHS category; and (2)

perform fluid sampling and analysis of LBHSs. Some of the plants are following these recommendations. Also these requirements have been incorporated in ASME OM Code.

- (3) NRC issued Regulatory Issue Summary (RIS) 2010-06, "Inservice Inspection and Testing Requirements of Dynamic Restraints (Snubbers)" on June 1, 2010 to remind all the licensees of the NRC's rules and regulations regarding snubber ISI and testing.
- (4) Within the regulations 10 CFR 50.55a(g)(5)(ii) states, in part, that "If a revised inservice inspection program for a facility conflicts with the technical specification (TS) for the facility, the licensee shall apply to the Commission for amendment of the TSs to conform the TS to the revised program."

===== end NRC staff understanding =====

The Kewaunee Understanding of Section 3.2.3.1.a follows

From: Jack Gadzala [mailto:jack.gadzala@dom.com]
Sent: Thursday, May 12, 2011 4:20 PM
To: Feintuch, Karl
Subject: KPS Relief Request RR-2-2 (ME4722) RAI Discussion

Karl,

As a followup from our earlier call today, I am providing the following reference for further discussion.

OMa-1998, Section 3.2.3.1.a states the following.

For the first sample lot tested, **10% of the snubbers in the general population** shall be selected. As far as practical, this **sample selected for testing shall include the various designs**, configurations, operating environments, range or sizes, and capacity of snubbers, etc. The first sample lots tested shall be a **composite based on the ratio of each particular category to the total numbers of snubbers installed in the plant**. Sample lot selection from the representative categories of snubbers shall be **random**.

KPS has a total of 99 snubbers installed onsite that are subject to this Code (2 of these 99 are the large bore snubbers). These 99 snubbers were randomly assigned into 9 groups per the Code requirement (**all 99 of these snubbers are part of the general population**). This random selection, in compliance with the above Code requirement, resulted in the 2 large bore snubbers being assigned into two different groups (since the Code requires that the sample groups each include the various types of snubbers). As such, the current Code of Record only requires that these snubbers be tested at the same interval as any other snubber onsite. Consequently, the **Code of Record does not require that the large bore snubbers be testing more frequently than any other snubber subject to the Code (for the current 10-year interval)**.

We understand that for the next 10-year interval, this will need to change (i.e., the snubbers will be grouped separately per the newer edition of the Code). However, the existing Code of record does not require this.

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