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DESCRIPTION:

Ltr. re our ltr. 12-18-75 & 6-30-75 and their lt . 8-15-75...
Furnishing detailed justification of their position regarding Tech. Spec. Relating to Hydraulic Snubbers.....

ENCLOSURES:

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PLANT NAME: Kewaunee

ACKNOWLEDGED
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WISCONSIN PUBLIC SERVICE CORPORATION

Public Service

P.O. Box 1200, Green Bay, Wisconsin 54305

January 9, 1976

DOCKETED USNRC JAN 12 1976 Mail Section Docket Clerk

RECEIVED JAN 13 1976 U.S. NUCLEAR REGULATORY COMMISSION Mail Section

Mr. Benard C. Rusche, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Rusche:

Subject: Technical Specifications Relating to Hydraulic Snubbers

Ref: Docket No. 50-305
Operating License DPR-43
Letter from Mr. R. A. Purple to Wisconsin Public Service Corporation dated 12/18/75
Letter to Mr. Benard C. Rusche from Wisconsin Public Service Corporation dated 8/15/75
Letter from Mr. R. A. Purple to Wisconsin Public Service Corporation dated 6/30/75

In our August 15, 1975, letter to Mr. Rusche we submitted proposed changes to the Kewaunee Plant Technical Specifications which we considered reasonable and proper. In that transmittal letter we stated:

a. The limiting conditions for operation in regards to hydraulic snubbers were included in a manner consistent with other limiting conditions of the Technical Specifications for safety related equipment.

b. The current technical specifications for the Kewaunee Plant require the inspection of hydraulic snubbers.

c. The Kewaunee Plant does not employ hydraulic snubbers of Bergan-Patterson manufacturer.

d. The Kewaunee Plant has not experienced leakage of hydraulic fluid due to seals on the installed hydraulic snubbers.

e. Increased surveillance should be employed on snubbers which have indicated a significant failure history but not on snubbers of different manufacture.

Although the December 18, 1975, referenced NRC letter states that, as a result of our comments noted above and comments from other licensees, changes

to model specifications were made; the changes to the model specifications are not related to the comments we provided. The Commission's staff's position or comments in regards to our comments and preliminary justification for our position in this matter have not been addressed to us.

The referenced December 18, 1975, letter required a detailed justification of our position if we believed that the revised model specification was inappropriate for the Kewaunee Nuclear Power Plant. This required justification follows.

Limiting Conditions for Operation Specification

The specifications proposed in the August 15, 1975, submittal are consistent with similar specifications for other safety related equipment on the Kewaunee Plant. The time frame for continued operation with an inoperable snubber is consistent with the model specifications. The model specifications require a plant shutdown to a "cold shutdown" condition within 36 hours if a hydraulic snubber cannot be repaired within the required time frame. The cooldown to a cold shutdown condition may not be the most conservative action possible. A system cooldown would be inadvisable with an inoperable snubber--support on a system which encounters significant thermal displacement. Significant safety margin is provided by the placing of the unit in a hot shutdown condition from the operating condition. This safety margin is considered adequate in regards to other safety related equipment at Kewaunee. It is our position that the determination of which shutdown condition, cold or hot, is required for safety of the public and the plant should be made at the time of occurrence by the responsible supervisor, taking into consideration the conditions which exist at that time.

Surveillance Requirement

The basis for the model specifications addresses specific problems with Bergan-Patterson snubbers related to piston shaft seals. Prior to the submittal of the August 15, 1975, letter our staff reviewed the failure reports of hydraulic snubbers. This review clearly indicated that the Bergan-Patterson snubbers had severe piston seal problems and apparently an improper seal material had been employed. The failure report review also indicated that snubbers of the manufacturer employed in the Kewaunee Plant had a record of high reliability, with only one failure reported. This reported failure at another plant was due to a personnel error (a craftsman had painted the snubber shaft which then caused a lockup of the shaft). The primary vendor for hydraulic snubbers at Kewaunee was contacted informally to gain additional information as to failure history of snubbers of his manufacturer. The vendor indicated that slight leaks had been encountered about the hydraulic hose connections which could be corrected by tightening the fitting; but the shaft seals had a record of high reliability. Following the submittal of proposed specifications, the hydraulic snubbers located in the Kewaunee containment were inspected for leakage to gain additional basis for our position in this matter. Seal leakage was not discovered on the fifty-six snubbers inspected.

The present technical specification requires inspection of the hydraulic snubbers during each in-service inspection interval. This specification requirement relies upon the ASME code to provide guidance and direction in regards to restraint and suppressor inspections. The code is employed throughout the regulations as the reference document about which the construction and inspection programs are based. We see no justification for disregarding the guidance provided by the code in this matter.

General Comments

The action on the part of the Commission's staff to correct and monitor a specific problem with Bergan-Patterson hydraulic snubbers has not been to implement specification or issue orders to plants which have snubbers with this specific problem. The staff has assumed that all hydraulic snubbers are suspect apparently regardless of manufacturer, model, seal material, history of reliable service, etc., and has required surveillance ten times as intensive as the code requires.

This action which would be analogous to the FAA requiring inspection of all airplanes when the failure of one component on one particular model is found defective or the Department of Transportation requiring all automobiles inspected on a periodic basis for defective steering column retaining bolts because one manufacturer encountered a number of failures on one model in one model year. Such actions would not be considered as reasonable and proper.

In regards to the NRC a precedent has been established. The NRC did not order a shutdown and increase surveillance on pressurized water reactors as a result of the cracks on boiling water reactors. The bulletins issued by the Office of Inspection and Enforcement address specific problems with specific components, i.e., Cutler-Hammer Switches addressed in RO Bulletin 74-15 and Westinghouse OT-2 Switches addressed in IE Bulletin 75-06.

It appears that the proposed model specifications are not consistent with the precedent established by the Commission to correct specific problems and follow the guidance provided by the ASME Codes.

We are increasingly concerned about the proliferation of surveillance requirements without regard for specific system design features, specific component reliability, system cycles required by test conditions, length of time spent in a less conservative condition than the most conservative due to component surveillance testing and increased operator confusion due to numbers of surveillance tests in progress. It may well be that the staff, while attempting to standardize specifications to address the most inferior of individual design features, is actually creating an unsafe condition in operating plants and indicating to the industry that no significant incentive will be provided to licensee for employing equipment of superior reliability.

It is our position that the in-service inspection program for the vessel, piping system and associated supports should be in accordance with the ASME Code as it has been in the past.

Very truly yours,

Carl W Geisler
for

E. W. James
Senior Vice President
Power Supply & Engineering

EWJ:sna