CENTRAL FILES

Iowa Electric Light and Power Company

March 13, 1981
LDR-81-94

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
OF NUCLEAR DIVISION

Mr. James G. Keppler, Director
Office of Inspection and Enforcement
Region III
Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Re: Duane Arnold Energy Center
Subject: IE Bulletin No. 81-01, Surveillance of Mechanical Snubbers
File: A-63j, A-101a, NRC-2, Bulletin 81-01

Dear Mr. Keppler:

In response to your letter transmitting the subject bulletin concerning surveillance of mechanical snubbers, we have completed our review of the actions to be taken by licensees. The following discussion provides the requested information available at this time and the schedule for completion of actions required to be taken at DAEC to address these NRC IE Bulletin concerns.

Item 1: Within 30 days of the issuance date of this bulletin, all normally accessible INC mechanical snubbers installed on safety-related systems or in storage shall be visually examined and tested as follows:

a. Perform a visual examination for damage and, without causing the system to be inoperable except as permitted by the facility technical specifications, verify that the snubbers have freedom of movement by performing a manual test over the range of the stroke in both compression and tension.

b. Perform an operability test to confirm that (1) activation (restraining action) occurs in both compression and tension and (2) the drag forces are within the specified range in both compression and tension. The test shall be performed on all snubbers in storage and on a representative sample (10% of the total of this type of snubber in use in the plant or 35, which ever is less) of the normally accessible snubbers that are in service and can be individually removed without causing the system to be inoperable, except as permitted by the facility technical specifications. For each snubber that does not meet the test acceptance criteria, an additional representative sample (as defined above) of this type of snubber shall be tested. For each of these additional snubbers that do not meet the test acceptance criteria, another representative sample of this type of snubber shall be tested. This cycle shall be

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repeated until no more failures have been found or until all snubbers of this type have been tested. The samples should be made up of snubbers representing the various sizes.

c. Snubbers which have been examined and tested in a manner comparable to Items 1a and 1b above within the last six months may be exempted.

d. If any failures are identified in Items 1a or 1b above, take corrective action and evaluate the effect of the failure on the system operability pursuant to the facility technical specifications for continued operation.

e. If failures are identified in Items 1a and 1b above, and if INC snubbers are known to be located in any inaccessible areas, a plant shutdown shall be performed within 30 days after the discovery of the first inoperable snubber and inspections conducted in accordance with Item 2a and 2b below, unless justification for continued operation has been provided to the NRC.

Response: There are no accessible International Nuclear Safeguards Corporation (INC) mechanical snubbers installed on safety-related systems at the Duane Arnold Energy Center. Also, there are no INC mechanical snubbers in storage.

Item 2: Visually examine and test all inaccessible INC mechanical snubbers installed on safety-related systems at the next outage of greater than five days duration as follows:

a. Visually examine and manually test all inaccessible snubbers as described in Item 1a above.

b. Perform an operability test on a representative sample of inaccessible snubbers as described in Item 1b above.

c. Snubbers which have been examined and tested in a manner comparable to Items 2a and 2b above within the last six months may be exempted.

d. If any failures are identified in Items 2a or 2b above, take corrective action to evaluate the effect of the failure on system operability pursuant to the facility technical specifications for resuming operation.

Response: There is a total of six (6) INC mechanical snubbers installed on safety-related systems at the DAEC. There have been no outages of greater than five (5) days duration in the interim period between issuance of IEB 81-01 and submittal of this response.

The 1981 refueling outage is scheduled to begin on March 20, 1981 and last for a period of eight (8) weeks. Due to the limited number of INC mechanical snubbers at the DAEC which require

testing under the provisions of IEB 81-01, it is our intent to examine and test all six (6) of the INC mechanical snubbers during this outage.

In accordance with the requirements of Item 4 of IEB 81-01, the results of the inspections, testing, and evaluation will be submitted within 30 days after completion of all inspection and testing.

Item 3: Provide a schedule for an inspection program covering mechanical snubbers produced by other manufactures. As a minimum, this inspection program shall:

a. Include all snubbers installed on safety-related systems;

b. Include the visual examination and manual test described in Item 1a above for all snubbers;

c. Snubbers which have been examined and tested in a manner comparable to Item 3b above within the last twelve months may be exempted.

d. Require the corrective action and evaluations described in Items 1d and 2d above; and

e. Be completed prior to the completion of the next refueling outage. Plants which are currently in a refueling outage should perform the visual examination and manual tests of inaccessible mechanical snubbers before resumption of operations unless some other basis for assurance of snubber operability is provided to the NRC.

Response: There are a total of 132 Pacific Scientific (PSA) mechanical snubbers installed on safety-related systems at the DAEC. As part of the Mark I Containment Modification, during the 1981 refueling outage, some of these will be moved to other locations, replaced with new snubbers with a larger capacity or removed from the systems, and some additional new snubbers may be installed.

In accordance with the requirements of Item 3b of IEB 81-01, all previously installed mechanical snubbers shall be visually inspected. Any new snubbers which have been inspected by the manufacturer in a manner comparable to Item 3b will,under the provisions of Item 3c, be exempted from the inspection requirements of IEB 81-01.

In accordance with the requirements of Item 4, the results of the inspections performed for Item 3 will be submitted within 60 days after completion of the inspection.

Item 4: Submit a report of the results of the inspections, testing and evaluation requested in Item 1 to NRC within 45 days of the issuance date of this bulletin. Report the results of the inspections, testing, and evaluation requested in Item 2 within 30 days after the inspection and testing have been completed. The response to Item 3 shall be submitted within 60 days of the issuance date of this bulletin. The results of the inspections performed for Item 3 shall be submitted within 60 days after the completion of the inspection.

The reports shall contain the following:

a. A description of the visual examinations and tests performed.

b. Number of snubbers examined and tested. Grouping by manufacturer name, model number, and size is acceptable.

c. Number of failures identified; manufacturer name, model number, size, mode of failure, cause of failure, corrective action, snubber location, effect of failure on plant and system safety, and justification for continuing or resuming operation.

d. The above information shall also be provided for the snubbers exempted by Items 1c, 2c, and 3c above.

Response: The reports required by Item 4 will be submitted on the schedule described in Items 1, 2, and 3 above.

If you have any questions or desire further information regarding this response, please contact this office.

Due to the additional work required for preparation of the reports required by Item 4, an estimate of the man-hours required to respond to this IE Bulletin is not yet available. This information will be provided with the final reports.

This response is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

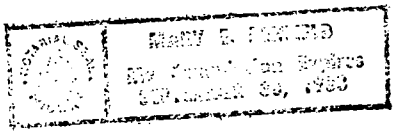
BY Larry D. Root

Larry D. Root
Assistant Vice President
Nuclear Generation

Subscribed and Sworn to Before Me on this 13 day of March 19 81.

Mary E. Benfield

Notary Public In and For the State of Iowa



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