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 MEDFORD, M. O. Southern California Edison Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 KNIGHTON, G. W. PWR Project Directorate 7

SUBJECT: Forwards, for review & approval, proposed Rev 2 to  
 QUAD-7-85-023, "Snubber Reduction Program for Nuclear  
 Piping Sys. "

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March 19, 1986

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M. O. MEDFORD  
MANAGER, NUCLEAR LICENSING

Director, Office of Nuclear Reactor Regulation  
Attention: Mr. George W. Knighton, Director  
PWR Project Directorate No. 7  
Division of PWR Licensing - B  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
San Onofre Nuclear Generating Station  
Units 2 and 3

- References:
- (1) October 9, 1985 letter from M. O. Medford (SCE) to George W. Knighton (NRC). Same Subject.
  - (2) January 9, 1986 letter from Dr. T. V. Galambos (University of Minnesota) to Mr. T. G. Longlais (Sargent and Lundy) Subject: Angle Members.
  - (3) January 15, 1986 letter from Mr. Gerhard Haaizer (AISC) to Mr. T. G. Longlais (Sargent and Lundy) Subject: Angle Members.

Enclosed for your review and approval are seven (7) copies of the proposed "Snubber Reduction Program for Nuclear Piping Systems, San Onofre Nuclear Generating Station, Units 2 and 3, Revision 2," dated February 1986 (Enclosure 1). This Revision 2 replaces Revision 1 which was submitted to the NRC by Reference (1) above. Southern California Edison (SCE) believes that this Revision 2 directly incorporates the NRC acceptance conditions for the proposed Snubber Reduction Program, Revision 1 except for the condition concerning angle members. The NRC conditions were received by Mr. D. Mercurio (SCE) from your Mr. H. Rood on November 20, 1985 (Enclosure 2).

It is our understanding that the angle member criteria, now included in Section 3.2.3 of the enclosed Snubber Reduction Program, Revision 2, have recently been accepted by the NRC for use on the LaSalle Nuclear Generating Station based on new information, References (2) and (3), which are provided in Enclosure 3.

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Using the criteria and methodology in the enclosed Snubber Reduction Program, Revision 2, SCE is planning to reanalyze the safety related plant piping systems less than thirty (30) inches in diameter and the control element drive mechanisms (CEDM's) with the intent of significantly reducing the number of safety related snubbers in the plant. Removal of unnecessary snubbers would result in increased reliability of piping systems, and reduce maintenance and surveillance requirements and reduce personnel radiation exposure.

This Southern California Edison proposal to limit the use of snubbers is consistent with the following recommendations from NUREG-1061 "Report of the U. S. Nuclear Regulatory Commission Piping Review Committee" Section 5.2.3:

For improving overall reliability of piping systems, the use of snubbers to meet piping system design requirements should be limited. The Committee believes that a non-mandatory "snubber reassessment" program for all plants should be initiated and that the nuclear industry should be encouraged to develop methods and procedures to limit the use of snubbers.

Please contact Mr. D. Mercurio (818) 302-2645 if you have any additional questions or comments. In addition, SCE is prepared to meet with you and your technical staff to provide any clarification or answer any questions you may have. Your acceptance of the proposed program is requested by April 15, 1986 so that SCE may proceed with the analysis on a reasonable schedule.

Very truly yours,



Enclosures

cc: H. Rood (U.S. Nuclear Regulatory Commission, SONGS 2/3 Project Manager)  
F. R. Huey (NRC Senior Resident Inspector)