



**DUKE POWER COMPANY**

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HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

December 8, 1982

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Mr. John F. Stolz, Chief  
Operating Reactors Branch No. 4

Subject: Oconee Nuclear Station  
Docket Nos. 50-269, -270, -287

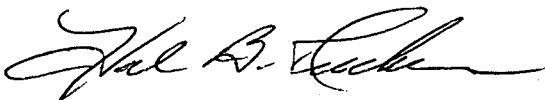
Dear Sir:

The purpose of this letter is to seek clarification of conditional snubber operability as described in certain Duke Power Technical Specifications. In Oconee Nuclear Station IE Inspection Report 50-269, -270, -287/82-37, the inspector, E. H. Brooks, discussed a previous unresolved item, (270/80-11-02), concerning operability of three snubbers with empty reservoirs and uncovered fluid ports. He wrote that Duke Power "has revised their technical specifications to permit functional testing of empty snubbers to determine operability and corresponding changes to snubber inspection schedule. The licensee was advised at the exit interview that it is the position of NRC that empty snubbers with fluid ports uncovered are considered inoperable and increased inspection frequency as indicated by technical specifications apply." Duke Power agrees that an empty snubber, one where the snubber itself is void of any oil, is considered inoperable. Both Oconee and McGuire Technical Specifications address uncovered fluid ports of hydraulic snubbers that appear inoperable as a result of visual inspection and state that the snubber shall be specifically tested for operability. The snubber is functionally tested and if the test produces successful results (the snubber is not empty and is operable), the snubber may be considered operable.

Attached are parts of Oconee Nuclear Station Technical Specification 4.18.1.(3)(b), and the McGuire Nuclear Station Technical Specification 4.7.8.(b), that discuss the steps to be taken when a hydraulic snubber fluid port is found uncovered and the snubber appears to be inoperable as a result of visual inspection.

Unless informed to the contrary, Duke Power considers that this position is acceptable to the NRC and that no further regulatory actions in this area are warranted.

Very truly yours,



Hal B. Tucker

JCP/php  
Attachment

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cc: Mr. James P. O'Reilly, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

Mr. W. T. Orders  
NRC Resident Inspector  
Oconee Nuclear Station

Mr. Philip C. Wagner  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attachment

Taken from Oconee Nuclear Station Technical Specification 4.18.1.(3)(b)

Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specification 4.18.4. However, when the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be tested by starting with the piston at the as found setting and extending the piston rod in the tension mode direction. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

Taken from McGuire Nuclear Station Technical Specification 4.7.B.(b)

Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specifications 4.7.8.d or 4.7.8.e, as applicable. Hydraulic snubbers which have uncovered fluid ports shall be tested by starting with the piston at the as found setting and extending the piston rod in the tension mode direction. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.