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RUSSELL, W. T. Region 1, Ofc of the Director

SUBJECT: Notifies that snubber sample plan has changed since last test period prior to second refueling & insp outage on 880305, per Tech Spec 4.7.4e. PSA-35 & PSA-100 snubbers segregated based on review of functional testing historu.

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MAR 1 1988

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SUSQUEHANNA STEAM ELECTRIC STATION
SNUBBER SAMPLE PLAN - UNIT 2 SECOND
REFUELING AND INSPECTION OUTAGE
PLA-2994 FILE R41-2 Docket No. 50-388

Reference: PLA-2673, H.W. Keiser to Dr. T.E. Murley, dated July 1, 1986.

Dear Dr. Russell:

Via the referenced letter, PP&L notified the NRC of the snubber sample plan for the Susquehanna SES Unit 2 first refueling and inspection outage, as required by Technical Specification 4.7.4e. This specification also requires us to notify you prior to the beginning of any subsequent outage if the sample plan has changed since the last test period. This transmittal fulfills that requirement.

We previously based our sampling program on the definition of type presented in Specification 4.7.4a., i.e., "snubbers of the same design and manufacturer, irrespective of capacity." Based on our maintenance experience from both of the SSES units, we are dividing one of our previously defined types, Pacific Scientific sizes 35 and 100, into two separate types (based on size) for sampling purposes.

Our decision to segregate the PSA-35 and PSA-100 snubbers is based upon our review of their functional testing history:

FAILURE RATE (%)

SIZE	U1-1RFO	U1-2RFO	U1-3RFO	U2-1RFO
PSA-35	0	3.0	6.3	2.9
PSA-100	37.5	21.1	60.6	12.5

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Several facts are noted from a review of this table:

1. The performance of the PSA-35 has been quite good.

2. The failure rate of the PSA-100 has been poor, with the worst experience to date coming in the Unit 1 third refueling and inspection outage. This rate forced testing of 100% of the Unit 1 PSA-100 snubbers during that outage.

3. The disparity between the performance of two components of the same design as defined in our previous transmittal indicates a problem that may be peculiar to the PSA-100 (or its specific locations) only.

The Susquehanna SES Unit 2 Technical Specifications allows regrouping within a specified type for sampling purposes. The last paragraph of Specification 4.7.4e. states the following:

> "If during the functional testing, additional sampling is required due to failure of only one type of snubber, the functional testing results shall be reviewed at the time to determine if additional samples should be limited to the type of snubber which has failed the functional testing."

PP&L is exercising this option in the reestablishment of our sampling plan. This action, while maintaining the necessary level of reliability of safety related snubbers, will also have the following benefits:

- A larger, more appropriate initial sample size of the PSA-100 snubbers will be required.

- Since they will no longer be grouped with the PSA-100 snubbers, a reduction in unnecessary resampling of the PSA-35 snubbers will be realized.

- Conversely, since they will no longer be grouped with the PSA-35 snubbers, the failure rate of the PSA-100 snubbers will be an unbiased representation of their performance.

- Any reduction in testing as a result of this regrouping (there are 502 PSA-35 snubbers and 58 PSA-100 snubbers in SSES Unit 2) will result in a reduction in accumulated dose to maintenance personnel.

Please be advised that we are investigating the high failure rate of the PSA-100 snubbers, and will inform you through appropriate channels of any significant information that arises during our attempts to determine the source of this problem.

Based on the above justification, the sample plan for the SSES Unit 2 second refueling and inspection outage will be as follows:

Type	Sample Plan
1. PSA-1/4 and 1/2	Specification 4.7.4e.1
2. PSA-1, 3, and 10	Specification 4.7.4e.2
3. PSA-35	Specification 4.7.4e.2
4. PSA-100	Specification 4.7.4e.1

For your information, the SSES Unit 2 second refueling and inspection outage is currently scheduled to begin on March 5, 1988. Any questions on this transmittal should be directed to Mr. R. Sgarro at (215) 770-7916.

Very truly yours,

H. W. Keiser
Vice President-Nuclear Operations

cc: NRC Document Control Desk (original)
Mr. F. I. Young, NRC Resident Inspector-SSES
Mr. M. C. Thadani, NRC Project Manager-Bethesda