Docket Nos.: STN 50-528/529/530

Mr. E. E. Van Brunt, Jr. Vice President - Nuclear Projects Arizona Public Service Company P. O. Box 21666 Phoenix, Arizona 85036

Dear Mr. Van Brunt:

SUBJECT: PRESERVICE INSPECTION AND TESTING OF SNUBBERS

The staff has determined that preservice inspection and test requirements for snubbers be included in the licensing process. Based on this determination and the long history of snubber problems as documented by Licensee Event Reports on the subject of inoperable and incorrectly installed snubbers, you are requested to meet the enclosed requirements.

Sincerely,

Original signed by Robert L. Tedesoo

Robert L. Tedesco, Assistant Director for Licensing Division of Licensing

Enclosure:
As stated

cc: See next page.

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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

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Due to a long history of problems dealing with inoperable and incorrectly installed snubbers, and due to the potential safety significance of failed snubbers in safety related systems and components, it is requested that maintenance records for snubbers be documented as follows:

Pre-service Examination

A pre-service examination should be made on all snubbers listed in tables 3.7-4a and 3.7-4b of Standard Technical Specifications 3/4.7.9 This examination should be made after snubber installation but not more than six months prior to initial system pre-operational testing, and should as a minimum verify the following:

- (1) There are no visible signs of damage or impaired operability as a result of storage, handling, or installation.
- (2) The snubber location, orientation, position setting, and configuration (attachments, extensions, etc.) are according to design drawings and specifictions.
- (3) Snubbers are not seized, frozen or jammed.
- (4) Adequate swing clearance is provided to allow snubber movement.
- (5) If applicable, fluid is to the recommended level and is not leaking from the snubber system.
- (6) Structural connections such as pins, fasteners and other connecting hardware such as lock nuts, tabs, wire, cotter pins are installed correctly.

If the period between the initial pre-service examination and initial system pre-operational test exceeds six months due to unexpected situations, re-examination of items 1,4, and 5 shall be performed. Snubbers which are installed incorrectly or otherwise fail to meet the above requirements must be repaired or replaced and re-examined in accordance with the above criteria.

Pre-Operational Testing

During pre-operational testing, snubber thermal movements for systems whose operating temperature exceeds 250° F should be verified as follows:

- (a) During initial system heatup and cooldown, at specified temperature. intervals for any system which attains operating temperature, verify the snubber expected thermal movement.
- (b) For those systems which do not attain operating temperature, verify via observation and/or calculation that the snubber will accommodate the projected thermal movement.
- (c) Verify the snubber swing clearance at specified heatup and cooldown intervals. Any discrepencies or inconsistencies shall be evaluated for cause and corrected prior to proceeding to the next specified interval.

. The above described operability program for snubbers should be included and documented by the pre-service inspection and pre-operational tost programs.

The pre-service inspection must be a prerequisite for the pre-operational testing of snubber thermal motion. This test program should be specified in Chapter 14 of the FSAR.