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Public Service Company OF Colorado

September 8, 1980 Fort St. Vrain Unit No. 1 P-80304

Mr. George Kuzmycz, Project Manager U. S. Nuclear Regulatory Commission Division Project Management Special Projects Washington, D. C. 20555

> SUBJECT: Fort St. Vrain Unit No. 1 Technical Specification Relief LCO 4.3.10

Dear Mr. Kuzmycz

Just prior to our scheduled maintenance shutdown we discovered that nine (9) of our hydraulic oil snubbers on the main steam line had bottomed out due to thermal growth of the main steam line. We entered into LCO 4.3.10 and were unable to correct the problem within the 72 hour time allowed by LCO 4.3.10 which forced us to shutdown one day earlier than planned.

Investigation of the problem revealed that our constant support hangers (spring hangers) were not properly adjusted for the hot position, and consequently these hangers were not carrying the appropriate load in the hot position which in turn affected the stroke position of various hydraulic snubbers.

During the 72 hour period of LCO 4.3.10 we were able to check and record the position of the snubbers and the constant support hangers and we have now been able to check the cold position of hangers and snubbers. It appears that many of the nangers will require new position settings, but the settings must be made at full steam conditions.

The nine snubbers which caused the original problems will be adjusted and restroked during our present outage; however, we expect that many of the other snubbers may be affected when we begin readjustment of the hot settings for the constant support hangars upon return to power operations. Due to the number of hangers involved it will be impossible to effect all necessary hanger adjustments within 72 hours allowed by LCO 4.3.10, and at the same time we must have full steam conditions in order to make the adjustments. The two situations are not compatible.

We are requesting, therefore, relief from LCO 4.3.10 for a period of 60 days following return to power after the present outage. This

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relief will allow time to check and readjust as necessary the hangers and snubbers for the main steam, cold reheat, and hot reheat lines.

We will plan our work so that no more than 15% of snubbers on a given line (i.e. 13 main steam snubbers, 9 hot reheat snubbers, or 9 cold reheat snubbers) are inoperable at any given time. Should the number of inoperable snubbers increase beyond these limits during the 60 day relief period we would apply the provisions of LCO 4.3.10 until the number of inoperable snubbers could be returned to a number less than the 15%. Keeping the number of inoperable snubbers to a minimum coupled with the low probability of seismic events should ensure safe operation of the unit during the sixty (60) day period.

Your immediate attention to this request will be appreciated as we are presently scheduled to return to power operation beginning September 22, 1980.

Very truly yours

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Don W. Warembourg Manager, Nuclear Production Fort St. Vrain Nuclear Generating Station

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