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REPLY TO:
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April 7, 1981



United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Division of Licensing
Darrell G. Eisenhut, Director

References: (1) License No. DPR-28 (Docket No. 50-271)
(2) NRC Letter to All Power Reactor Licensees
(except SEP Licensees) dated November 20, 1980

Dear Sir:

Subject: Technical Specification Revisions for Snubber Surveillance

Your letter (Reference 2) requested that we submit an application to incorporate the applicable portions of the model Technical Specifications into Appendix A of the Vermont Yankee Technical Specifications.

We have completed a detailed review of the model technical specifications and do not share your view that the proposed additional "changes, clarifications and improvements" will provide additional assurances of snubber operability.

Vermont Yankee finds insufficient justification for implementing the additional requirements presented by Reference (2). The bases for our position are as follows:

- 1) Your proposed Tech. Spec. 4.7.9b Visual Inspection Acceptance Criteria states... "when the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined operable via functional testing for the purpose of establishing the next visual inspection interval."

Comment

Vermont Yankee's Tech. Spec. states that visual inspections are required to verify snubber operability.

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Vermont Yankee's approach, which has received concurrence of the NRC inspector, is that a lack of fluid in a snubber reservoir does not necessarily render that snubber inoperable. Operability is determined by subjecting the snubber to a functional test in the as-found condition. If the snubber fails to pass the functional test, it is considered inoperable for the purposes of establishing the next visual inspection interval. This is consistent with the intent of the technical specification, i.e., to maintain an acceptable level of suppressor operability. In all cases, causes of fluid leaks are investigated and corrected.

Vermont Yankee maintains that this is a sound and conservative approach.

- 2) Your proposed Tech. Spec. 4.7.9c requires that, "In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included in the resampling."

Comment

A snubber functional test failure is a violation of Vermont Yankee's present Technical Specifications and, as a result, would require PORC review as well as NRC notification. The subsequent LER specifies that certain corrective action has been, or will be, taken and depending on the mode of functional test failure may include functional testing during the next test period in order to determine if service related or generic problems exist with the snubber. The Tech. Specs. also require that in the event of a functional test failure, an additional 10% of the snubbers are removed for testing, efforts would be made to select snubbers in similar locations and operating conditions in an attempt to determine any possible failure trends. Vermont Yankee feels that this approach meets the intent of the proposed Tech. Specs. and that any additional arbitrary snubber removal and testing is not defensible due to ALARA considerations.

- 3) Your proposed Tech. Spec. 4.7.9.c requires that for snubbers found inoperable as a result of functional testing... "an engineering evaluation shall be performed on the components

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which are supported by the snubber(s). The purpose of this evaluation shall be to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubber(s) in order to ensure that the supported component remains capable of meeting the designed service."

Comment

Vermont Yankee's 50 safety class snubbers serve as seismic supports only. Therefore, an engineering evaluation is required only if (1) during the period of time during which the snubber may have been inoperable, a seismic event occurred, or, (2) the snubber fails to move during the functional test which would have restricted thermal movement of the component to which the snubber was attached.

The shock suppressor maintenance procedure will be revised to reflect the requirements for an engineering evaluation in the two instances described above prior to the next functional tests.

- 4) Proposed Tech. Spec. Section 4.7.9f Snubber Service Life Monitoring requires, "A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 6.10.2.1.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, the installation and maintenance records for each snubber listed in Tables 3.7-4a and 3.7-4b shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review.

If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be reevaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. This reevaluation, replacement or reconditioning shall be indicated in the records."

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Comment

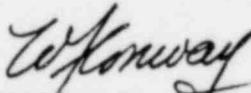
Vermont Yankee's present snubber surveillance program requires retention of maintenance records for all snubber testing and repairs. Vermont Yankee's maintenance program requires periodic review of these records in order to determine any failure trends which would establish criteria for determining equipment service life. We feel that this program complies with the intent of the proposed Tech. Specs. and that no further changes are necessary.

It is the opinion of Vermont Yankee that the Technical Specifications, operation, and maintenance procedures presently in effect are appropriate and sufficient in providing the required assurance of snubber operability and reliability. We will continue to evaluate suggested Technical Specification proposals and surveillance testing methods and make changes whenever such changes will result in improved and safer plant operation.

We note with great interest that there is no mention of resetting snubbers based on snubber fluid viscosity changes due to elevated ambient temperatures. As documented in various NRC Inspection Reports, particularly between 1977 and 1979, Vermont Yankee has incorporated this into the program. All snubbers located in a high temperature environment were removed and calibration as a result. It is our feeling that this is an important aspect of demonstrating snubber operability that should be a part of all licensees programs.

We believe that you will find our conclusions appropriately responsive to your proposals. In the event you should desire further discussion of this matter, please do not hesitate to contact us.

Very truly yours,



William F. Conway
Vice President and Manager of Operations

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