

Nebraska Public Power District

GENERAL OFFICE
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LQA8100047

March 6, 1981

To ADM/DMB:

PDR
LPDR
NSIC
ADM/TIDC
ADM/RSB

Mr. Karl V. Seyfrit, Director
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011



Dear Mr. Seyfrit:

Subject: IE Bulletin No. 81-01
"Surveillance of Mechanical Snubbers"

The following are Nebraska Public Power District's responses to action items described in the subject bulletin.

Items 1 and 2

Within 30 days of the issuance of the date of the subject bulletin, all normally accessible International Nuclear Safeguards Corporation (INC) mechanical snubbers installed on safety-related systems or in storage shall be visually examined and tested as prescribed. Part 2 addressed test and inspection of all inaccessible INC mechanical snubbers.

Response

Cooper Nuclear Station has never utilized or purchased any INC mechanical snubbers.

Items 3 and 4

Provide within 60 days of the issuance of the subject bulletin, a schedule for an inspection program covering mechanical snubbers produced by other manufacturers. At a minimum, the inspection program shall include all snubbers installed on safety-related systems and shall include a prescribed visual examination and manual test. A provision for exempting snubbers examined and tested within the last 12 months was provided. If any snubber failures are identified, corrective action to evaluate the effect on

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system operability pursuant to our facility technical specifications shall be taken. And finally, the entire inspection program shall be complete prior to the conclusion of the next refueling outage, with the results submitted within 60 days of the completion of the outage.

Response

Mechanical snubbers, built by Pacific Scientific Company (PSC), were first installed at Cooper Nuclear Station (CNS) for replacement of existing hydraulic snubbers during our fall 1976 outage. NPPD's experience to date has disclosed failure of one (1) mechanical snubber which was installed on a nonsafety-related system. The cause for this failure was improper installation. The types of failures of Pacific Scientific snubbers described in the subject bulletin appear to have resulted from improper installation or improper sizing of the snubber.

Nebraska Public Power District believes that, for the types of failures observed to date on the PSC snubbers, your request for wholesale testing of mechanical snubbers is inordinate and excessive. The District feels a more logical approach, and the one we shall pursue, is to 1) complete a detailed visual inspection of all snubbers installed on safety-related systems; 2) conduct a random review of 20% of the design calculations which determined sizing requirements; and 3) mechanically inspect (stroke) 100% of accessible and 20% of the inaccessible mechanical snubbers installed on safety-related systems, consistent with Cooper Nuclear Station ALARA considerations. Our basis for a 20% design review is to verify our approach was correct in sizing and locating the snubbers. The fact that a snubber is visually inspected and mechanically stroked, will not determine if the snubber is incorrectly sized and may subsequently fail following reinstallation.

The District does believe some random mechanical inspections should be conducted to add to our data base of possible snubber failure modes. However, a 100% mechanical inspection program at this point, is not justifiable from an ALARA standpoint. The exposure to complete such a program would be excessive, which with our current failure mode and rate information, cannot be vindicated.

Nebraska Public Power District will submit, within 60 days of the spring refueling outage, the detailed report requested in Item 4. This report will identify any future plans for additional mechanical snubber inspections as determined by our inspection plan above and, in addition, to the inspections required in our planned Technical Specification submittal on mechanical snubbers.

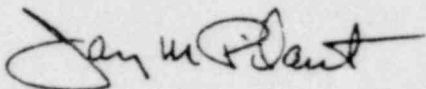
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Approximately 60 man-hours were expended in the review and preparation of this response. Should you have any questions or comments relative to this matter, please contact my office.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jay M. Pilant".

Jay M. Pilant
Director of Licensing
and Quality Assurance

JMP/KCW/cmK:dp6/1

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STATE OF NEBRASKA)
)ss
PLATTE COUNTY)

Jay M. Pilant, being first duly sworn, deposes and says that he is an authorized representative of the Nebraska Public Power District, a public corporation and political subdivision of the State of Nebraska; that he is duly authorized to submit this information on behalf of Nebraska Public Power District; and that the statements in said application are true to the best of his knowledge and belief.

Jay M. Pilant
Jay M. Pilant

Subscribed in my presence and sworn to before me this 12th day of March, 1981.

Marilyn R. Hohndorf
NOTARY PUBLIC

My Commission expires Oct. 14, 1984.

