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June 5, 1981 MP-2-4804

Mr. Boyce H. Grier Director, Region I Office of Inspection and Enforcement U. S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, Pennsylvania 19406

Reference: Facility Operating License No. DPR-65 Docket No. 50-336 Reportable Occurrence R0-50-336/81-018/3L-0

Dear Mr. Grier:

This letter forwards Licensee Event Report 81-018/3L-0 required to be submitted within thirty days pursuant to Millstone Unit 2 Appendix A Technical Specifications, Section 6.9.1.9.b, conditions leading to operation in a degraded mode permitted by a limiting condition for operation. An additional three copies of the report are enclosed.

Yours truly,

NORTHEAST NUCLEAR ENERGY COMPANY

E. D. Mroczka

Station Superintendent Millstone Nuclear Power Station

EJM/SS:WS

Attachment: LER 81-018/3L-0

cc: Director, Office of Inspection and Enforcement, Washington, D. C. (30)

Director, Office of Management Information and Program Control, Washington, D. C. (3)

U. S. Nuclear Regulatory Commission, c/o Document Management Branch, Washington, D. C. 20555

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ATTACHMENT TO LER #81-018/3L-0

Event description and probable consequences:

During a plant "Hot Standby" condition, dimensional inspection of safety related pipe hangers inside containment containing International Nuclear Safeguards Co. mechanical snubbers was being performed to obtain information for snubber changeout at the next cold shutdown.

This inspection revealed several INC mechanical snubbers installed on small diameter piping. These snubbers were determined to be safety related and had not previously been identified. Refer to Table I attached.

Further review revealed that other mechanical snubbers, previously identified as seismic Class II, were safety related. Refer to Table II attached. A cold shutdown was initiated to allow snubber stroke testing and replacement as required. Refer to Tables I, II and III attached for a listing of snubbers tested, test results and piping systems affected. No technical specification action statements were entered as a result of snubber testing and replacement. Table IV attached is a summary of all the INC mechanical snubbers tested during this outage.

Discovery of the "Frozen" snubber condition questions the ability of the snubber to perform its design function, i.e. Allow pipe movement during changing thermal conditions and provide a restraining force during a seismic event. Also, the "Frozen" snubber may have produced unexpected loads on their respective piping systems during changing thermal conditions.

Cause description and corrective actions:

The previous listing of mechanical snubbers did not include a review of small diameter piping. Small diameter pipe was originally determined to be "Chart Hung" pipe, therefore, no snubbers would be installed. A review of safety related pipe stress problems indicates that several small diameter pipe systems were "Analyzed" designs containing snubbers. This review also revealed that other portions of piping systems containing mechanical snubbers previously determined to be non-safety related were in fact safety related.

All safety related piping stress problems were reviewed for mechanical snubber identification and listing. Most mechanical snubbers previously classified as non-safety related were reclassified as safety related. The plant was placed in a cold shutdown and all safety related mechanical snubbers inside and outside containment were stroke tested.

All snubbers that failed to stroke were replaced with mechanical snubbers manufactured by Pacific Scientific Company. Each piping system containing a frozen snubber was stress analyzed to determine the loads produced by the frozen snubber on the piping system as the system expanded or contracted due to changing thermal conditions. Several areas of possible overstress were identified. Subsequent inspection of these areas did not reveal any detrimental effects due to the frozen snubbers.

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Long term corrective action includes replacement of all INC mechanical snubbers installed on hangers that support safety related piping systems.

ATTACHMENT TO LER #81-018/3L-0 TABLE I SMALL DIAMETER PIPE MECHANICAL SNUBBERS

SNURRER THENT *		INC MODEL #	TEST DATE		PIPING	
		1				
FSK-M-02-024	DP.23	1	5/6/81	ACC	Main	Steam
FSK-M-02-025	DP.125	1	5/6/81	ACC	Main	Steam
FSK-M-02-025	DP.125	1	5/6/81	ACC	Main	Steam
FSK-M-02-027	DP.190	1	5/6/81	ACC	Main	Steam
FSK-M-02-026	DP.307	1	5/6/81	REJ	Main	Steam
FSK-M-02-023	DP.158	1	5/6/81	ACC	Main	Steam
FSK-M-02-022	DP.109	1	5/6/81	ACC	Main	Steam
FSK-M-02-030	DP.253	1	5/6/81	ACC	Main	Steam
FSK-M-02-022	DP.107	1	5/7/81	ACC	Main	Steam
SK-M-1016	DP.215	1.	5/7/81	ACC	Main	Steam
SK-M-1016	DP.208	1	5/7/81	REJ	Main	Steam
FSK-M-02-097	DP.402	1 1	5/13/81	REJ	Main	Steam
FSK-M-17-095	DP.501	1	5/7/82	REJ	CVCS	
FSK-M-17-095	DP.34	2	5/7/81	REJ	CVCS	
FSK-M-17-103	DP.411	1	5/6/81	ACC	CVCS	
FSK-M-17-013	DP.38	1	5/11/81	ACC	CVCS	
FSK-M-15-029	DP.537	1	5/7/81	ACC	HPSI	
FSK-M-15-021	DP.781	1	5/7/81	ACC	HPSI	
FSK-M-32-012	DP.152	1	5/7/81	REJ	Reactor	Coolant

*Snubbers S/N are not available - Snubbers are identified by piping dwg. and data point.

ATTACHMENT TO LER #81-018/3L-0 TABLE II "NEW" SAFETY RELATED MECHANICAL SNUBBERS

INC				1			
HANGER	INC	MODEL	TEST DATE				
#	S/N	#	RESULT		PIPING SYSTEM		
414001	002262	3	5/10/81	ACC	Reactor Coolant Sys.		
414001	002289	3	5/10/81	ACC	Reactor Coolant Sys.		
414002	002271	3	5/10/81	ACC	Reactor Coolant Sys.		
414002	002259	3	5/10/81	ACC	Reactor Coolant Sys.		
414006	61	2	5/10/81	ACC	Reactor Coolant Sys.		
414006	67	2	5/10/81	ACC	Reactor Coolant Sys.		
414009	18229	3	5/10/81	ACC	Reactor Coolant Sys.		
414009	002251	3	5/10/81	ACC	Reactor Coolant Sys.		
414016	59	2	5/10/81	REJ	Reactor Coolant Sys.		
414016	66	2	5/10/81	ACC	Reactor Coolant Sys.		
414018	270	1	5/10/81	ACC	Reactor Coolant Sys.		
414018	274	1	5/10/81	ACC	Reactor Coolant Sys.		
414021	88	2	5/10/81	ACC	Reactor Coolant Sys.		
414021	103	2	5/10/81	REJ	Reactor Coolant Sys.		
414024	68	2	5/10/81	REJ	Reactor Coolant Sys.		
414024	102	2	5/10/81	ACC	Reactor Coolant Sys.		
414025	415	2	5/10/81	ACC	Reactor Coolant Sys.		
414025	416	2	5/10/81	ACC	Reactor Coolant Sys.		
414027	81	2	5/10/81	ACC	Reactor Coolant Sys.		
414027	100	2	5/10/81	ACC	Reactor Coolant Sys.		
414029	76	2	5/9/81	ACC	Reactor Coolant Sys.		
414029	87	2	5/9/81	ACC	Reactor Coolant Sys.		
414029	88	2	5/9/81	ACC	Reactor Coolant Sys.		
414029	109	2	5/9/81	ACC	Reactor Coolant Sys.		
414032	80	2	5/9/81	REJ	Reactor Coolant Sys.		
414032	101	2	5/9/81	ACC	Reactor Coolant Sys.		
414033	138	2	5/10/81	REJ	Reactor Coolant Sys.		

ATTACHMENT TO LER #81-018/3L-0 TABLE II "NEW" SAFETY RELATED MECHANICAL SNUBBERS

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INC HANGER INC MODEL TEST DATE # S/N # RESULT PIPING SYSTEM 414033 N/A REJ 2 5/10/81 Reactor Coolant Sys. 414035 176 1 5/11/81 REJ Reactor Coolant Sys. Reactor Coolant Sys. 514001 002152 4 ACC 5/10/81 411003 002272 3 REJ 5/11/81 Feedwater 2 411009 60 REJ Feedwater 5/11/81 411009 104 2 REJ 5/11/81 Feedwater 411016 002264 3 5/11/81 REJ Feedwater 411045 54 2 REJ 5/11/81 Feedwater 411045 64 2 5/11/81 ACC Feedwater 411062 105 2 5/11/81 REJ Feedwater 411062 72 2 5/11/81 REJ Feedwater 513008 147 1 5/11/81 REJ Main Steam 513036 625 1 5/11/81 REJ Main Steam 513040 141 2 5/11/81 ACC Main Steam 513041 272 1 5/11/81 ACC Main Steam 513042 1 None 5/11/81 ACC Main Steam 60026 1502 2 REJ 5/11/81 Feedwater 60025 001627 2 REJ 5/11/81 Feedwater

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ATTACHMENT TO LER #81-018/3L-0 TABLE III "OLD" SAFETY RELATED MECHANICA! SNUBBERS

		INC					
HANGER	INC	MODEL	TEST DATE	E			
#	S/N	#	RESULT		PIPING SYSTEM		
310022	44	2	5/9/81	REJ	Safety Injection		
410007	42	2	5/9/81	ACC	Safety Injection		
410092	36	2	5/8/81	REJ	Safety Injection		
510004	107	2	5/9/81	REJ	Safety Injection		
507002	002257	3	5/9/81	REJ	Safety Injection		
507002	002253	3	5/9/81	REJ	Safety Injection		
408001	32	2	5/9/81	REJ	Reactor Coolant Sys		
408002	24	2	5/9/81	ACC	Reactor Coolant Sys		
408002	33	2	5/9/81	ACC	Reactor Coolant Sys		
408003	22	2	5/9/81	ACC	Reactor Coolant Sys		
408003	19	2	5/9/81	ACC	Reactor Coolant Sys		
408004		2	5/9/81	REJ	Reactor Coolant Sys		
408004		1 1	5/9/81	REJ	Reactor Coolant Sys		
408005	83	2	5/9/81	ACC	Reactor Coolant Sys		
408005	94	2	5/9/81	ACC	Reactor Coolant Sys		
408009	21	2	5/10/81	ACC	Reactor Coolant Sys		
408009	20	2	5/10/81	ACC	Reactor Coolant Sys		
408009	140	2	5/10/81	ACC	Reactor Coolant Sys		
408010	38	2	5/10/81	ACC	Reactor Coolant Sys		
408010	47	2	5/10/81	ACC	Reactor Coolant Sys		
408010	48	2	5/10/81	ACC	Reactor Coolant Sys		
408010	120	2	5/10/81	ACC	Reactor Coolant Sys		
408011	28	2	5/10/81	ACC	Reactor Coolant Sys		
408011	30	2	5/10/81	ACC	Reactor Coolant Sys		
408012	40	2	5/10/81	ACC	Reactor Coolant Sys		
408012	46	2	5/10/81	ACC	Reactor Coolant Sys		
410037	37	2	5/8/81	274	Reactor Coolant Svs		

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ATTACHMENT TO LER #81-0183L-0 TAB! E III "OLD" SAFETY KELATED MECHANICAL SNUBBERS

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	INC				
INC	MODEL	TEST DATE		100000000000000000000000000000000000000	
S/N	#	RESULT		PIPING SYSTEM	
41	2	5/8/81	ACC	Reactor Coolant Sys	
39	2	5/8/81	ACC	Reactor Coolant Sys	
27	2	5/8/81	REJ	Reactor Coolant Sys	
45	2	5/8/81	ACC	Reactor Coolant Sys	
34	3	5/8/81	ACC	Reactor Coolant Sys	
002819	2	5/8/81	REJ	Reactor Coolant Sys	
002260	3	5/7/81	REJ	Shutdown Cooling	
002258		5/7/81	REJ	Shutdown Cooling	
160	1	5/9/81	ACC	Containment Spray	
161	1	5/9/81	ACC	Containment Spray	
162	1	5/9/81	ACC	Containment Spray	
165	1	5/9/81	ACC	Containment Spray	
90	2	5/8/81	ACC	Containment Spray	
71	2	5/8/81	ACC	Containment Spray	
002294	3	4/28/81	REJ	LPSI/CS Common	
411	1	4/28/81	REJ	LPSI/CS Common	
149	M	4/30/81	REJ	LPSI/CS Common	
159	M	4/30/81	ACC	LPSI/CS Common	
53	2	4/30/81	ACC	LPSI/CS Common	
	INC S/N 41 39 27 45 34 002819 002260 002258 160 161 162 165 90 71 002294 411 149 159 53	INC MODEL S/N # 41 2 39 2 27 2 45 2 34 3 002819 2 002258 160 1 161 1 165 1 90 2 71 2 002294 3 411 1 149 M 159 M 53 2	INC MODEL TEST DATI RESULT 5/N # RESULT 41 2 5/8/81 39 2 5/8/81 27 2 5/8/81 45 2 5/8/81 34 3 5/8/81 002819 2 5/3/81 002260 3 5/7/81 002258 5/7/81 5/9/81 160 1 5/9/81 161 1 5/9/81 165 1 5/9/81 165 1 5/9/81 165 1 5/9/81 165 1 5/9/81 165 1 5/9/81 165 1 5/9/81 165 1 5/9/81 002294 3 4/28/81 411 1 4/28/81 149 M 4/30/81 159 M 4/30/81 159 M 4/30/81	INC MODEL TEST DATE S/N # RESULT 41 2 5/8/81 ACC 39 2 5/8/81 ACC 27 2 5/8/81 REJ 45 2 5/8/81 REJ 34 3 5/8/81 ACC 302260 3 5/7/81 REJ 002258 5/7/81 REJ 160 1 5/9/81 ACC 161 1 5/9/81 ACC 162 1 5/9/81 ACC 165 1 5/9/81 ACC 165 1 5/9/81 ACC 90 2 5/8/81 ACC 71 2 5/8/81 ACC 002294 3 4/28/81 REJ 411 1 4/28/81 REJ 149 M 4/30/81 RC 53 2 4/30/81 ACC	

ATTACHMENT TO LER #81-018/3L-0 TABLE IV SUMMARY OF MECHANICAL SNUBBER TESTING

Total # of snubbers tested = 110 Total # of failures = 39

> 1 of 2 INC Model "M" failed to stroke 10 of 31 INC Model "1" failed to stroke 21 of 62 INC Model "2" failed to stroke 7 of 14 INC Model "3" failed to stroke 0 of 1 INC Model "4" failed to stroke