

**Florida
Power**
CORPORATION

November 17, 1981
File: 3-0-3-a-3



Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Enhanced Snubber Operability Program

Dear Sir:

Crystal River Unit 3 is presently in its third refueling and maintenance outage. Part of the maintenance being performed is visual inspection and functional testing of hydraulic snubbers. As of this date, visual inspection of all snubbers and functional testing of the first ten representative sample snubbers have been completed.

The visual inspection resulted in eight (8) snubbers being declared inoperable. All eight of these were located within the reactor building, and all were declared inoperable because the aluminum reducer bushings which connect the fluid line from the valve body to the cylinder were cracked. This could allow fluid leakage and snubber air entrainment.

Based upon these results, the Crystal River Unit 3 Technical Specifications would require a snubber visual surveillance frequency of 31 days. As an alternative to the 31-day inspection frequency, Florida Power proposes to upgrade the snubbers. The upgrade program will consist of replacing the aluminum bushings of snubbers, under 50,000 lb. capacity, in the reactor building, with stainless steel bushings. Operating experience with stainless steel bushings indicates no failures to date. The replacement of these bushings will be effective in eliminating this failure mode and assuring the operability of the snubbers. Therefore, Florida Power Corporation believes that this program effectively eliminates the visual inspection snubber failure findings, and on this basis requests that the visual surveillance interval be maintained at 18 months.

In addition to visual surveillance, a representative sample of ten snubbers are required to be functionally tested on an 18 month cycle. Florida Power Corporation has completed functional testing of these ten snubbers and as a result of the findings, has declared four (4) snubbers inoperable.

General Office

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Page 2
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The Crystal River Unit 3 Technical Specifications require that an additional representative sample of ten snubbers be functionally tested for each snubber found inoperable by functional testing. Florida Power Corporation intends to perform "as found" functional testing on all snubbers removed from the reactor building in lieu of the representative sampling program outlined in the Crystal River Unit 3 Technical Specifications. The results of this testing program will provide sufficient data to determine the acceptability of snubbers in all applications at Crystal River Unit 3.

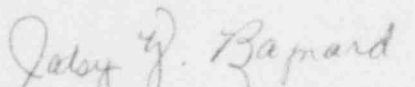
In order to complete the upgrade of the snubbers outside containment, Florida Power Corporation will replace the aluminum bushings on one-third of these snubbers every six months. This will result in a complete upgrade by the time the next surveillance interval begins. In addition, visual surveillance of the remaining snubbers with aluminum bushings will be performed on a nine-month schedule until all aluminum bushings have been replaced.

Florida Power Corporation has determined that this action requires a Class III approval, as defined by 10CFR170. Accordingly, a check in the amount of \$4,000 is enclosed.

Should you have any questions, please contact this office.

Very truly yours,

FLORIDA POWER CORPORATION


Patsy Y. Baynard, Manager
Nuclear Support Services

EFW:cmd