



**GPU Nuclear**  
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August 5, 1982  
4400-82-L-0121

Office of Inspection and Enforcement  
Attn: Mr. Ronald C. Haynes, Director  
Region I  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)  
Operating License No. DPR-73  
Docket No. 50-320  
I & E Bulletin 81-01

Reference: Letter, Boyce H. Grier to G. K. Hovey, dated January  
27, 1981 transmitting I. E. Bulletin 81-01

This letter responds to I. E. Bulletin 81-01. This bulletin requires  
actions by licensees in four specific areas. These four required  
actions and GPU Nuclear's response is listed below.

Required Action 1

Within thirty (30) days of the issuance date of this bulletin, all  
normally accessible INC mechanical snubbers installed on safety-  
related systems or in storage shall be visually examined and tested  
as follows:

- a. Perform a visual examination for damage and, without  
causing the system to be inoperable except as permitted  
by the facility Technical Specifications, verify that  
the snubbers have freedom of movement by performing  
a manual test over the range of the stroke in both  
compression and tension.
- b. Perform an operability test to confirm that (1)  
activation (restraining action) occurs in both  
compression and tension and (2) drag forces are  
within the specific range in both compression  
and tension. The tests shall be performed on  
all snubbers in storage and on a representative  
sample (10% of the total of this type of snubber  
in use in the plant or 35, which ever is less)

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of the normally accessible snubbers that are in service and can be individually removed without causing the system to be inoperable, except as permitted by the facility Technical Specifications. For each snubber that does not meet the test acceptance criteria, an additional representative sample (as defined above) of this type of snubber shall be tested. For each of these additional snubbers that do not meet the test acceptance criteria, another representative sample of this type of snubber shall be tested. This cycle shall be repeated until no more failures have been found or until all snubbers of this type have been tested. The samples should be made up of snubbers representing the various sizes.

- c. Snubbers which have been examined and tested in a manner comparable to Items 1a and 1b above within the last six months may be exempted.
- d. If any failures are identified in Items 1a or 1b above, take corrective action and evaluate the effect of the failure on the system operability pursuant to the facility Technical Specifications for continued operation.
- e. If failures are identified in Items 1a and 1b above, and if INC snubbers are known to be located in any inaccessible areas, a plant shutdown shall be performed within thirty (30) days after the discovery of the first inoperable snubber and inspections conducted in accordance with Item 2a and 2b below, unless justification for continued operation has been provided to the NRC.

#### Response 1

TMI-2 does not have any INC mechanical snubbers installed on safety-related systems or in storage.

#### Required Action 2

Visually examine and test all inaccessible INC mechanical snubbers installed on safety related systems at the next outage of greater than five days duration as follows:

- a. Visually examine and manually test all inaccessible snubbers as described in Item 1a above.
- b. Perform an operability test on a representative sample of inaccessible snubbers as described in Item 1b above.

- c. Snubbers which have been examined and tested in a manner comparable to Items 2a and 2b above within the last six months may be exempted.
- d. If any failures are identified in Items 2a or 2b above, take corrective action to evaluate the effect of the failure on system operability pursuant to the facility Technical Specifications for resuming operation.

#### Response 2

TMI-2 does not have any INC mechanical snubbers installed on safety-related systems.

#### Required Action 3

Provide a schedule for an inspection program covering mechanical snubbers produced by other manufacturers. As a minimum, this inspection program shall:

- a. Include all snubbers installed on safety-related systems;
- b. Include the visual examination and manual test described in Item 1a above for all snubbers;
- c. Snubbers which have been examined and tested in a manner comparable to Item 3b above within the last twelve months may be exempted;
- d. Require the corrective action and evaluations described in Items 1d and 2d above; and
- e. Be completed prior to the completion of the next refueling outage. Plants which are currently in a refueling outage should perform the visual examination and manual test of inaccessible mechanical snubbers before resumption of operations unless some other basis for assurance of snubber operability is provided to the NRC.

#### Response 3

The mechanical snubbers installed on the safety-related systems at TMI-2 were manufactured by the Pacific Scientific Company. Because of the post accident long term cold shutdown condition of TMI-2 and the relatively minor concerns associated with Pacific Scientific mechanical snubbers GPU Nuclear classifies this a long term concern to be addressed prior to TMI-2 restart.

However, the Electric Power Research Institute (EPRI) has in place a program to inspect and analyze several of the mechanical snubbers to determine the effect of the accident and the post accident conditions on these components.

#### Required Action 4

Submit a report of the results of the inspections, testing and evaluation requested in Item 1 to NRC within forty-five (45) days of the issuance date of this bulletin. Report the results of the inspections, testing, and evaluation requested in Item 2 within thirty (30) days after the inspection and testing have been completed. The response to Item 3 shall be submitted within sixty (60) days of the issuance date of this bulletin. The results of the inspections performed for Item 3 shall be submitted within sixty (60) days after the completion of the inspection.

The reports shall contain the following:

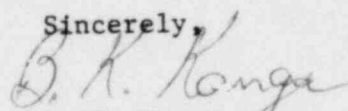
- a. A description of the visual examinations and tests performed.
- b. Number of snubbers examined and tested. Grouping by manufacturer name, model number, and size is acceptable.
- c. Number of failures identified; manufacturer name, model number, size, mode of failure, cause of failure, corrective action, snubber location, effect of failure on plant and system safety, and justification for continuing or resuming operation.
- d. The above information shall also be provided for the snubbers exempted by Items 1c, 2c, and 3c above.

#### Response 4

The mechanical snubbers installed on the safety-related systems at TMI-2 were manufactured by the Pacific Scientific Company. Because of the post accident long term cold shutdown condition of TMI-2 and the relatively minor concerns associated with Pacific Scientific mechanical snubbers, GPU Nuclear classifies this a long term concern to be addressed prior to TMI-2 restart.

However, the Electric Power Research Institute (EPRI) has in place a program to inspect and analyze several of the mechanical snubbers to determine the effect of the accident and the post accident conditions on these components.

Sincerely,



B. K. Kanga  
Director, TMI-2

BKK:SWS:djb

cc: L. H. Barrett, Deputy Program Director, TMI Program Office  
Dr. B. J. Snyder, Program Director, TMI Program Office