

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

# SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

# RELATED TO AMENDMENT NO. 17 TO FACILITY OPERATING LICENSE NO. NPF-8

### ALABAMA POWER COMPANY

# JOSEPH M. FARLEY NUCLEAR PLANT, UNIT NO. 2

DOCKET NO. 50-364

### Introduction

By letter dated August 2, 1982, Alabama Power Company (APCO) advised that on February 10, 1982 two inaccessible hydraulic snubbers had been declared inoperable. Technical Specification 4.7.9.a is an augmented inservice inspection program requirement for a visual inspection to be performed after four months, but within ten months of the start of power operations. The specification states that if two snubbers are found inoperable during the first inspection, the second inspection shall be performed 6 months +25% from the date of the first inspection. This schedule would require approximately a five-day shutdown of Farley 2 for which APCO has requested relief.

Technical Specification 4.7.9.b establishes the visual inspection acceptance criteria. One criteria defining an inoperable snubber is that the fluid port of a hydraulic snubber is uncovered. When this is the case, the specification allows a functional test with the piston in the as found setting or the snubber must be declared inoperable. APCO personnel erroneously declared the two snubbers inoperable when it was reported "to have insufficient fluid in the reservoir." Operators reportedly refilled the reservoirs before performing further checks of the fluid port. Thus, the two snubbers had to be declared inoperable and removed from the system for functional tests. No seal deterioration or other causes of fluid leakage was found. Thus, the failures were evaluated by APCO as being of a non-recurring nature.

In order to preclude an unscheduled plant shutdown on September 25, 1982, with the scheduled refueling outage starting on October 22, 1982, APCO proposes a Technical Specification change on a one-time basis to allow the inspection to be accomplished during the refueling outage.

## Discussion and Evaluation

On February 10, 1982, Surveillance for Technical Specification 4.7.9.a was performed at Joseph M. Farley Nuclear Plant, Unit 2. The surveillance involved a 100% visual inspection of all snubbers listed in Table 3.7-4a. Low levels of hydraulic fluid were discovered in the reservoirs of two inaccessible snubbers. The two snubbers were declared inoperable and removed from service. The reservoirs were refilled with hydraulic fluid, and then the snubbers were functionally tested. These results showed that both units functioned properly. Therefore, they were returned to service as operable. Examinations revealed no seal deterioration or other causes of leakage in the two snubbers. It appears that the low fluid level was caused by leakage at loose fittings.

Based on the determination by APCO personnel that the snubbers were inoperable, Technical Specification 4.7.9.b requires the inaccessible snubbers to be visually inspected by September 25, 1982. Since the plant is scheduled for the first refueling outage on October 22, 1982, a request was made to extend the required inspection by one month so the time will coincide with the first refueling outage.

The primary purpose of Technical Specification 4.7.9.a is to identify improper installations such as loose fittings or malfunctioning snubbers during the early plant operation. The Technical Specification permits the functional testing of seemingly inoperable snubbers under the "as found" condition. Should they then pass the test successfully, they would not be counted as inoperable snubbers for the purpose of establishing the subsequent inspection period. Thus, this provision separates a malfunctioning snubber from other failure causes as opposed to improper installation problems.

However, since hydraulic fluid was added to the two snubbers before the functional test, this required the two snubbers to be declared inoperable, even though they both successfully passed the subsequent functional test. Examination did not reveal seal deterioration or other causes for the leakage.

#### Summary

The snubbers have been returned to service in a verified operable condition. Also, the possible leakage due to loose fittings, not normally of a recurring nature, has been corrected. Therefore, we believe that the extension of the required inspection interval for these inaccessible snubbers for a period of one month, is justifiable. We approve the one-time Technical Specification changes with a minor change to the proposed wording which was agreed to by the APCO staff.

#### Environmental Consideration

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR 551.5(d)(4), that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

### Conclusion

We have concluded, based on the considerations discussed above, that (1) because the amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of an accident of a type different from any evaluated previously, and does not involve a significant reduction in a margin of safety, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

#### Principal Contributors

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Date: September 22, 1982