



Docket No. 50-346

License No. NPF-3

Serial No. 878

November 24, 1982

RICHARD P. CROUSE
Vice President
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Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz
Operating Reactor Branch No. 4
Division of Operating Reactors
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Stolz:

This letter is being submitted in response to your letter of October 13, 1982 (Log No. 1111) concerning Technical Specifications for Snubber Surveillance at Davis-Besse Nuclear Power Station Unit No. 1. Your letter indicated that the Toledo Edison submittal dated June 29, 1981 (Serial No. 725) was unacceptable because the ANSI/ASME OM-4 standard proposed to be used was under development and had an uncertain issuance date.

Based on extensive in-house engineering, maintenance and operations review of the issue on snubber Technical Specifications, Toledo Edison continues to support the use of the industry ANSI/ASME OM-4 standard. In light of the fact that OM-4 has now been approved by the Consensus Committee as of October 31, 1982, the concern over when issuance would occur has been negated. Since the issuance date and lack of NRC approval are the only areas of concern expressed in your October 13, 1982 letter, we feel it is now up to the NRC to review the final document.

In the Toledo Edison review of ANSI/ASME OM-4 as finally issued, we have developed the following plan of action:

- ° All Nuclear Safety Related (NSR) snubbers as defined in the Standard will be listed in tables in the Technical Specifications in a manner similar to the current table on hydraulic snubbers. Grouping will be done per the OM-4 Standard criteria.
- ° All NSR mechanical and hydraulic snubbers will be tested per ANSI/ASME OM-4 1982 with the exception of six (6) large bore and eight (8) medium size hydraulic snubbers which will be tested prior to rebuilding. This has previously been approved by the NRC but a rejustification will be made for relief request per the OM-4 Standard.

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- ° Past visual inspections of mechanical and hydraulic snubbers will be used as appropriate to meet the baseline criteria for the OM-4 Standard criteria.
- ° The current Technical Specifications will be modified to reference the use of the OM-4 Standard as a augmented program in our current ISI program. The Technical Specifications will list the affected snubbers, but the detail inspection program will be a part of our ISI program to allow easy updates as the OM-4 Standard becomes part of the ASME Code and updates become mandatory for implementation by Toledo Edison.

Due to current workload, the fact that hydraulic snubbers are currently being inspected per Technical Specifications and the mechanical snubbers have been recently examined by the requirements of IE Bulletin 81-01 plus the internal review requirements we plan to submit revised Technical Specifications in accordance with the above by June 30, 1983.

Very truly yours,



RPC:LDY:lah

cc: DB-1 NRC Resident Inspector