

August 15, 1984

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Docket No. 50-346

Mr. Richard P. Crouse
Vice President - Nuclear
Toledo Edison Company
Edison Plaza - Stop 712
300 Madison Avenue
Toledo, Ohio 43652

Dear Mr. Crouse:

SUBJECT: SNUBBER TECHNICAL SPECIFICATIONS

By letter dated September 1, 1983 (No. 984) Toledo Edison company submitted an application to amend the Davis-Besse Nuclear Power Station Technical Specifications. The application proposed changes to Section 3.7.7 and Table 3.7-3 relating to snubbers on plant systems. This application was in response to a request dated November 20, 1980.

On April 6, 1984 and and again on April 25, 1984 we discussed your application by telephone with your staff. We identified three areas requiring modification. Briefly these are as follows:

- a) Section 4.7.7.1 b. - The concept of a graded inspection frequency, as proposed in your application, is not acceptable,
- b) Section 4.7.7.2. a. - The exception of snubbers with a capacity greater than 50,000 lbs. from functional testing is not acceptable.
- c) Section 4.7.7.2 c. - The in-place testing of mechanical snubbers must go beyond just verifying that the **snubber** is not locked solid.

On May 3, 1984 Generic Letter 84-13 was issued. This letter modified the Commission's guidance for snubber technical specifications and provided a revised Model Technical Specification for snubbers. We request that you review the Commission's guidance and our recent discussions on this issue and resubmit a revised application no later than October 1, 1984.

Sincerely,

/s/

John F. Stolz, Chief
Operating Reactors Branch No. 4
Division of Licensing

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ORB#4:DL
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