

**Florida
Power**

CORPORATION
Crystal River Unit 3
Docket No. 50-302

June 4, 1992
3F0692-04

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

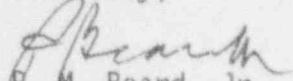
Subject: Relief Request 92-010

Dear Sir:

Attached please find Relief Request 92-010 for your review and approval. This request proposes the use of guidelines for the selection of sample populations provided in ASME Operation and Maintenance of Nuclear Plants, Part 4 (OM-4), 1987, as an alternative to the sample selection requirements of the ASME Boiler and Pressure Vessel Code, Section XI, 1983 Edition Through Summer 1983 Addenda, Article IWF-5400(c), Snubbers that Fail Inservice Tests.

Functional testing during the current Refuel 8 Outage resulted in one snubber with unacceptable performance. A root cause evaluation was performed which identified a problem with the way the snubber was assembled in 1983. The OM-4 guidelines allow the selection and testing of those snubbers which could be expected to have the same deficiency for the expanded sample population. Additionally, it allows the expanded sample to be smaller. This expanded sample consists of 17 snubbers. ASME Section XI would require a representative sample of 27 snubbers for the expanded sample population. Florida Power Corporation considers the OM-4 guidelines provide better assurance of overall snubber operability by focusing on the unique deficiency. This alternative testing exceeds the sample composition requirements of Crystal River Unit 3 Technical Specification 3/4.7.9, "Hydraulic Snubbers".

Sincerely,


P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

PMB:LVC
Attachment

xc: Regional Administrator, Region II
NRR Project Manager
Senior Resident Inspector

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FLORIDA POWER CORPORATION
INSERVICE INSPECTION
CRYSTAL RIVER UNIT 3

Relief Request 92-010

REFERENCE CODE: ASME Boiler and Pressure Vessel Code, Section XI,
1983 Edition through Summer 1983 Addenda

I. Component for which exemption is requested:

(a) Name and Identification Number:

Hydraulic Snubbers

(b) Function:

Pipe Restraint

(c) ASME Section III Code Class:

N/A

(d) Category:

IWF 2500-1, Exam Category F-C, Item F3.50

II. Reference Code Requirement That Has Been Determined to Be
Impractical:

ASME Boiler Pressure Vessel Code Section XI, Article IWF-5400
(c), "Snubbers that Fail Inservice Tests" requires an
additional sample of 10% of the total number of snubbers shall
be tested due to failures of the initial representative sample
tested.

III. Basis For Requesting Relief:

The guidelines of OM-4, 1987, establish a sample composition
for additional tests due to specific failure mode of snubbers.
The subsequent sample shall be based on a root cause analysis
of the unacceptable snubber or snubbers. Additional snubbers
selected for functional testing shall be those which may be
expected to have the same or similar deficiencies as the
unacceptable snubber or snubbers.

During functional testing of hydraulic snubbers in Refuel 8,
the piston rod of MSH-163 became separated from the piston
inside the cylinder. Florida Power Corporation (FPC) completed
a root cause analysis on the hydraulic snubber. The failure
was attributed to personnel error during the installation

Basis For Requesting Relief (Continued):

phase of the snubber in 1983. Apparently, during the attachment of the extension piece, the piston rod unscrewed from the piston. The root cause is only pertinent to snubbers with an extension piece attached to the rod end of the snubber. FPC believes that in this case, selection of the sample composition of subsequent lots following the OM-4, 1987 guidelines is more effective at addressing the root cause.

IV. Alternate Examination:

The following alternate examination will only be applicable to the functional testing performed during Refuel 8:

FPC will functionally test all snubbers (17) which have extension pieces similar to that of MSH-163 that have not been functionally tested since 1983. These seventeen snubbers will constitute the additional sample selected due to the failure of MSH-163.