

January 23, 1989

Docket No. 50-334

Mr. J. D. Sieber, Vice President
Nuclear Group
Duquesne Light Company
Post Office Box 4
Shippingport, Pennsylvania 15077

Dear Mr. Sieber:

SUBJECT: BEAVER VALLEY UNIT 1 - ISSUANCE OF AMENDMENT (TAC NO. 64076)

The Commission has issued the enclosed Amendment No. 135 to Facility Operating License No. DPR-66 for the Beaver Valley Power Station, Unit No. 1, in response to your application dated November 12, 1986 and supplemental information dated November 17, 1988.

The amendment revises the visual inspection requirements for snubbers and the service life monitoring requirements.

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's bi-weekly Federal Register notice.

Sincerely,

Signed by

Peter S. Tam, Senior Project Manager
Project Directorate I-4
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 135 to DPR-66
- 2. Safety Evaluation

cc w/enclosures:
See next page

LA:PDI-4
SNorris
12/13/88

PM:PDI-4
PTam:lm *PST*
12/15/88

PSTam for
PD:PDI-4
JStolz
1/10/89

send back for rewrite
OGC
JM
1/23/89

LM
BC:EMEB
LMarsh
1/10/89

*DGC comments on SE have been addressed by rewrite.
PSTam 1/23/89*

(5520 Document Name: AMEND TAC 64076)

*JFOI
//*

*CA
[Signature]*

Mr. J. Sieber
Duquesne Light Company

Beaver Valley Power Station
Units 1 & 2

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AMENDMENT NO. 135 TO FACILITY OPERATING LICENSE NO. DPR-66

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cc: Licensee/Applicant Service List



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

DUQUESNE LIGHT COMPANY

OHIO EDISON COMPANY

PENNSYLVANIA POWER COMPANY

DOCKET NO. 50-334

BEAVER VALLEY POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 135
License No. DPR-66

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Duquesne Light Company, et al. (the licensee) dated November 12, 1986, and supplemented by letter dated November 17, 1988 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-66 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 135, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective on issuance, to be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



John F. Stolz, Director
Project Directorate I-4
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: January 23, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 135

FACILITY OPERATING LICENSE NO. DPR-66

DOCKET NO. 50-334

Replace the following pages of Appendix A (Technical Specifications), with the enclosed pages as indicated. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

<u>Remove</u>	<u>Insert</u>
3/4 7-26	3/4 7-26
3/4 7-27	3/4 7-27
3/4 7-28	3/4 7-28
3/4 7-29	3/4 7-29
-	3/4 7-30
B 3/4 7-6	B 3/4 7-6
B 3/4 7-6a	B 3/4 7-6a

3/4.7.12 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.12 All snubbers shall be OPERABLE. The only snubbers excluded from this requirement are those installed on non safety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems[#] required OPERABLE in those MODES).

ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.12.d on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.12 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these groups (inaccessible and accessible) may be inspected independently according to the schedule below. The first inservice visual inspection of each type of snubber shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers. If all snubbers of each type are found OPERABLE during the first inservice visual inspection, the second inservice visual inspection of that type shall be performed at the first refueling outage. Otherwise, subsequent visual inspections of a given type shall be performed in accordance with the following schedule:

[#] These systems are defined as those portions or subsystems required to prevent releases in excess of 10 CFR 100 limits.

SURVEILLANCE REQUIREMENTS

4.7.12, (Continued)

<u>No. of Inoperable Snubbers of Each Type per Inspection Period</u>	<u>Subsequent Visual Inspection Period* **</u>
0	18 months + 25%
1	12 months + 25%
2	6 months + 25%
3, 4	124 days + 25%
5, 6, 7	62 days + 25%
8 or more	31 days + 25%

Early inspections (i.e., those performed before 75% of the current inspection period has elapsed) may be used to set new reference surveillance dates for the current inspection period. However, the results of such early inspections cannot be used to increase the current inspection period (Period may only stay the same or decrease as determined by the table in 4.7.12.b).

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: (1) there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, provided that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type that may be generically susceptible; or (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.12.e or 4.7.12.f, as applicable.

* The inspection interval for each type of snubber shall not be lengthened more than one step at a time unless a generic problem has been identified and corrected; in that event the inspection interval may be lengthened one step the first time and two steps thereafter if no inoperable snubbers of that type are found.

** The provisions of Specification 4.0.2 are not applicable.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

When a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be declared inoperable and shall not be determined OPERABLE via functional testing except in the following case. If the fluid port of a hydraulic snubber is found to be uncovered due to a leak in the hydraulic fluid supply line or fittings and the snubber passes the functional test criteria after being filled with fluid and vented of air, then the snubber may be determined OPERABLE for the purpose of establishing the next visual inspection interval provided that inspections are performed to verify adequate remote reservoir fluid supply only for all snubbers of the same type in six (6) months \pm 25%. If after the first six (6) month inspection, the as-left reservoir level is determined to be an inadequate supply until the next refueling outage, perform an additional visual inspection of the remote reservoir fluid level only in six (6) months \pm 25%.

Snubbers which have been determined to be inoperable as a result of unexpected transients, isolated damage, or other random events, and cannot be proven operable by functional testing for the same reasons, shall not be counted in determining the next visual inspection period when the provision in 4.7.12.d (that failures are subject to an engineering evaluation of component structural integrity) has been met and equipment has been restored to an operable state via repair and/or replacement as necessary.

d. Functional Tests

At least once per 18 months during shutdown, a representative sample (of at least 10 snubbers or at least 10% whichever is less) of the total of each type of snubber in use in the plant shall be functionally tested either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria of Specification 4.7.12.e or 4.7.12.f an additional 10 snubbers or at least 10% whichever is less of that type of snubber shall be functionally tested.

For each large bore snubber (snubbers greater than 1500 kips) on the reactor coolant system that does not meet the functional test acceptance criteria of Specification 4.7.12.e, an engineering evaluation is required to determine the failure mode. If the failure is determined to be generic, an additional 10% (for each failure) of that type of snubber shall be functionally tested. If the failure is determined to be non-generic, an additional 10% (for each failure) of that type of snubber will be tested during the next functional test period.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

1. The first snubber away from each reactor vessel nozzle
2. Snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.)
3. Snubbers within 10 feet of the discharge from a safety relief valve.

Snubbers that are especially difficult to remove or in high radiation zones during shutdown shall also be included in the representative sample*

If a spare snubber has been installed in place of a failed snubber, the spare snubber shall be retested. Test results of this snubber may not be included for the re-sampling.

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same design subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test acceptance criteria.

For the snubber(s) found inoperable, an engineering evaluation shall be performed on the components which are supported by the snubber(s). The purpose of this engineering evaluation shall be to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubber(s) in order to ensure that the supported component remains capable of meeting the designed service.

* Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

e. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
2. Snubber bleed, or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

f. Mechanical Snubbers Functional Test Acceptance Criteria

The mechanical snubber functional test shall verify that:

1. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force.
2. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
3. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

g. Snubber Service Life Monitoring*

The service life of hydraulic and mechanical snubbers shall be monitored to ensure that the service life is not exceeded between surveillance inspections. The maximum expected service life for various seals, springs, and other critical parts shall be determined and established based on engineering information and may be extended or shortened based on monitored test results and failure history. Critical parts shall be replaced so that the maximum service life will not be exceeded during a period when the snubber is required to be OPERABLE. The parts replacements shall be documented and the documentation shall be retained in accordance with Specification 6.10.2.

* For purposes of establishing a baseline for the determination of service life monitoring, this program will be implemented over 3 successive refueling periods.

PLANT SYSTEMS

BASES

3/4.7.12 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other similar event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to each safety-related system during an earthquake or other similar event initiating dynamic loads. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. In order to establish the inspection frequency for each type of snubber on a safety-related system, it was assumed that the frequency of snubber failures and initiating events is constant with time and that the failure of any snubber on that system could cause the system to be unprotected and to result in failure during an assumed initiating event. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, or verified operable by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation and vibration.

When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

PLANT SYSTEMS

BASES

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at refueling or 18 month intervals not to exceed two (2) years. Observed failures of these sample snubbers shall require functional testing of additional units.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2-kip, 10-kip and 100-kip capacity manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" for the purposes of this Technical Specification would be of a different type, as would hydraulic snubbers from either manufacturer.

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc...). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 135 TO FACILITY OPERATING LICENSE NO. DPR-66

DUQUESNE LIGHT COMPANY
OHIO EDISON COMPANY
PENNSYLVANIA POWER COMPANY

BEAVER VALLEY POWER STATION, UNIT NO. 1

DOCKET NO. 50-334

INTRODUCTION

By letter dated November 12, 1986, Duquesne Light Company (the licensee, acting as agent for the above utilities) submitted a request to amend the Beaver Valley 1 Technical Specifications to revise the snubber surveillance requirements. We requested additional information by letter dated September 28, 1988 and the licensee responded to the request by letter dated November 17, 1988. The licensee's response provides the needed supplemental information for use to complete our review.

DISCUSSION AND EVALUATION

(1) Section 4.7.12.a, "Inspection Types"

The licensee proposed to create a new Section 4.7.12.a to define snubber types as "snubbers of the same design and manufacturer, irrespective of capacity." While this is a new paragraph, it reflects the existing approach of performing functional tests on a representative sample on each type of snubber, as stated in Specification 4.7.12.c.

This paragraph is thus a clarification of current requirement, is identical to the same in the staff's draft Revision 5 of Standard Westinghouse Technical Specifications (WSTS) and is thus acceptable.

(2) Section 4.7.12.b, "Visual Inspections"

The former Section 4.7.12.a (Amendment No. 100) is rewritten to become Section 4.7.12.b. Three substantive changes are introduced. The first changes the acceptance criterion at the first inservice visual inspection. Since that inspection already occurred 10 years ago, this change is of no consequence to Beaver Valley Unit 1. The second change modifies the footnote regarding lengthening of visual inspection periods. The old requirement permitted only one-step lengthening. This change allows that if "a generic problem has been identified and corrected", "the inspection interval may be lengthened one step the first time and two steps thereafter if no inoperable snubbers of that type are found." While this is a relaxation, the new requirement is more reasonable and would still assure acceptable snubber operability. Both these changes conform with our position expressed in draft Revision 5 of the WSTS and are acceptable.

The third change permits early inspections be done (i.e. earlier than 75% of the inspection period has elapsed). The early inspections may only be used to set new reference dates (using the current date) for future inspections, but may not be used to increase the current inspection period. This change serves to increase scheduling flexibility and does not decrease the level of snubber operability. This change is acceptable.

(3) Section 4.7.12.c, "Visual Inspection Acceptance Criteria"

The change revises the first part of the first paragraph of visual inspection acceptance criteria to reflect draft Revision 5 of the WSTS. The change requires the visual inspection of the snubber, attachments to the foundation or supporting structure and fasteners for attachments of the snubber to the component and to the snubber anchorage. This requirement currently does not exist in the TS; its addition helps to ensure the operability of snubber fasteners. The second change allows a snubber which appears inoperable to be determined operable provided that either the cause of rejection is remedied for that snubber and other snubbers that may be generically susceptible, or the affected snubber passes the functional testing criteria. The "either --- or" provision constitutes a relaxation from the former requirement, which required both conditions ("and") be satisfied. The licensee defended this relaxation by using examples in its November 17, 1988 letter. We agree with the licensee's argument that the "either --- or" requirement is more reasonable, would reduce occupational radiation exposure and would not significantly decrease assurance of snubber operability. We find this change acceptable. We note that the Callaway plant has a similar specification.

The second paragraph in this section is a new one and it modifies the inspection requirements for hydraulic snubbers found with the fluid port uncovered due to a leak in the hydraulic fluid supply line or fittings but not due to a snubber problem. If the snubber passes the functional test criteria after being filled with fluid and vented of air, the snubber may be determined operable provided that inspections are performed to verify adequate remote reservoir fluid supply for all snubbers of the same type in accordance with a schedule in this paragraph. Performance of visual inspections for many hydraulic snubbers requires plant shutdown. The changed requirement would only require inspection of reservoir level and can be done at power. This requirement specifies that if the reason for low fluid level can be clearly attributed to reasons other than a faulty snubber, all snubbers of the same type need not suffer a reduced, (tightened) inspection interval provided the problem is remedied. We agree with the licensee's argument and find this change acceptable.

The third paragraph permits an inoperable snubber that cannot be determined operable by functional testing to be declared operable for the purpose of establishing a new inspection interval, if it can be determined that the snubber was rendered inoperable as a result of unexpected transients, isolated damage or other random events. Examples of events which would be considered random or isolated include an object inadvertently dropped on a snubber or a chainfall accidentally anchored on a snubber. An engineering evaluation of

component structural integrity would still be performed after each failure. If it can be determined that a snubber was rendered inoperable as a result of unexpected transients, isolated damage or other random events, similar failures would not be anticipated. Therefore, additional inspections should not be required to verify overall snubber operability since the cause is external. We find this change, with the parentheses added to the last sentence to improve clarity, acceptable. (This change is identical to Amendment No. 72 issued to North Anna on November 21, 1985).

(4) Section 4.7.12.d, "Functional Tests"

Previously this was Section 4.7.12.c.

The requirements for functional testing of snubbers have been clarified by establishing separate initial sample sizes for testing of small-bore snubbers and large-bore snubbers (snubbers with load capacities greater than 1500 kips). The change will not alter the current requirements regarding the testing of additional snubbers for small-bore snubbers. However, in the event of a large-bore snubber functional test failure, an engineering evaluation will be performed to determine if the failure is generic in nature. If the failure is generic in nature, an additional ten percent of the large-bore snubbers will be functionally tested for each large-bore snubber functional test failure. Corrective action will be based on the results of the additional functional tests. If failure is determined by an engineering evaluation to be nongeneric in nature, the functional testing of the additional ten percent of the large-bore snubbers for each failure will be postponed until the next functional test period. At that time, the additional snubbers will be tested (ten percent of all large-bore snubbers for each failure) in addition to the normal ten percent sample scheduled for testing during that functional test period. This is acceptable since specific isolated nongeneric functional test failures do not affect the operability of the remaining large-bore snubbers, and do not decrease the margin of plant safety. An identical specification has been approved for North Anna Units 1 and 2 (dated November 21, 1985).

(5) Sections 4.7.12.e and 4.7.12.f, "Hydraulic Snubbers Functional Test Acceptance Criteria" and "Mechanical Snubbers Functional Test Acceptance Criteria."

These two sections are just renumbered from 4.7.12.d and 4.7.12.e.

(6) Section 4.7.12.i, "Snubber Service Life Program"

The change revises the wording of snubber service life monitoring requirements to reflect draft Revision 5 of the WSTS. This changed wording specifically allows for the maximum expected service life for various seals, springs and other critical parts to be extended or shortened based on monitored test results and failure history. Critical parts will be replaced so that the maximum service life will not be exceeded during the period when the snubber is required to be operable. This change clarifies the existing requirement and conforms with an identical paragraph in the Beaver Valley Unit 2 Technical Specifications. We find the rewording of this section acceptable.

(7) Bases Section 3/4.7.12, "Snubbers"

Appropriate paragraphs have been revised to reflect the above Technical Specification changes.

ENVIRONMENTAL CONSIDERATION

This amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. We have determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. We have previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: January 23, 1989

Principal Contributor: Peter S. Tam, with input from D. Capton and J. Rajan