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A Duke Energy Company

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December 4, 2000

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

Subject: Oconee Nuclear Station
Docket 50-269, -270, -287
Selected Licensee Commitments Manual (SLC)

Gentlemen:

Pursuant to 10CFR 50.4 and 50.71, please find attached 7 copies of the latest revisions to the Oconee Selected Licensee Commitments Manual (SLC). The SLC Manual is Chapter 16.0 of the Oconee Updated Final Safety Analysis Report (UFSAR). This manual is intended to contain commitments and other station issues that warrant higher control, but are not appropriate for inclusion into the Technical Specifications (TS). Instead of being updated with the annual UFSAR Update, the SLC Manual will be updated as necessary throughout the year.

Very truly yours,

W. R. McCollum, Jr.
Vice President
Oconee Nuclear Station

CMB/cmb
Attachment

xc: Luis A. Reyes
Regional Administrator, Region II

D. E. LaBarge, ONRR

M. C. Shannon
Oconee Senior Resident Inspector

A001

December 4,2000

To: Manual Holders

Subject: Oconee Selected Licensee Commitments Manual (SLC) Revision

On November 16, 2000, Station Management approved a revision to SLC 16.13.1 which was implemented on November 20, 2000. This change revises Minimum Station Staffing Requirements to reflect the addition of three operators when Condition B of Technical Specification 3.5.2, High Pressure Injection (HPI) is entered.

In addition, on November 3, 2000, Station Management approved revisions to SLC 16.9.18 which were implemented on November 21, 2000. This change revises the SLC to remove the 72-hour out-of-service time allowed for snubber repairs and replacements; adds clarification to APPLICABILITY section addressing snubbers required to be OPERABLE for MODE 5 and 6 systems; and incorporates NRC Generic Letter 90-09 recommended visual inspection frequencies.

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Any questions concerning these revisions may be directed to Reene Gambrell at ext. 3364 or Steve Newman at ext. 4388.

Regulatory Compliance
By: Conice Breazeale
Regulatory Compliance

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Table 16.13.1-1

MINIMUM STATION STAFFING REQUIREMENTS

	THREE UNITS IN MODES 1-4	TWO UNITS IN MODES 1-4 CONTROLLED FROM TWO CONTROL ROOMS	TWO UNITS IN MODES 1-4 CONTROLLED FROM ONE CONTROL ROOM	ONE UNIT IN MODES 1 - 4	THREE UNITS IN MODES 5 OR 6 OR NO MODE
OSM	1	1	1	1	1
STA	1	1	1	1	1
SRO[1]	5	5	4	4	3
RO[3]	6	5	5	4	3
NLO[1,2]	8	8	8	8	7
SPOC	7	7	7	7	6
Chemistry Technician	1	1	1	1	1
RP Technician	3	3	3	3	3

1 SRO number can be reduced by one when a qualified NLO is designated the fire brigade leader. The NLO number must be increased by one.

2 NLO number must be increased by two when in ITS 3.5.2 Condition B.

3 RO number must be increased by one when in ITS 3.5.2 Condition B.

	NLO is serving as the fire brigade leader, the SRO number for each column in Table 16.13.1-1 may be reduced by one.
1 SRO (active or inactive) – ERO	Required by Volume A, Section B, Figure B-2 of the Emergency Plan. Implemented by OMP. SRO serves as the offsite communicator and the NRC communicator in the TSC. This is permissible since the offsite communicator role is completed prior to the NRC communicator role starting.
5 RO's	Required by 10 CFR 50.54(m)(2)(i).
1 RO - SSF	Required by ITS 5.2.2.h, implemented by OMP. Per ITS 5.2.2.h, the manpower necessary to operate the SSF will be exclusive of the fire brigade and the minimum operating shift that is required to be present in the Control Room. ITS 5.2.2.b and10 CFR 50.54(m)(2)(iii) require 3 of the 5 RO's required by 10 CFR 50.54(m)(2)(i) to be present in the control room when fuel is in the reactor. When all three units are in MODES 1-3, one RO per unit must be available to be dispatched to the SSF. Since 3 RO's must be present in the Control Room only two are available to dispatch to the SSF. Therefore, one additional RO, beyond what is required by 10 CFR 50.54(m)(2)(i), is required.
1 RO - ADV	Amendment 314, 314, 314 requires that staffing level be increased by an additional RO beyond what is required in Table 16.13.1-1 when in Condition B of ITS 3.5.2. The additional RO is designated to respond to an event requiring activation of the SSF for the unit operating under ITS 3.5.2 Condition B. The additional RO role may be fulfilled by an SRO as long as the SRO is not being counted towards the number of required SROs listed in Table 16.13.1-1 and is qualified to tasks involving operation of the SSF systems. When all three units are in MODES 1-4, a total of seven ROs are required; five per 10 CFR 50.54(m)(2)(I), one per ITS 5.2.2.h, and one per ITS 3.5.2 Condition B.
8 NLO's	Required by 10 CFR 50 Appendix R Part III.H, ITS 5.2.2.a, Volume A, Appendix 8, Spill Prevention

	and Control and Counter Measures Plan, Revision 98-04, 10/98 of the Emergency Plan, and Volume A, Section B, Figure B-8 of the Emergency Plan. Implemented by OMP. (Four for fire brigade, one NLO per Unit to complete critical AP and EOP actions and 1 for SSF equipment verification for the design basis Appendix R fire.) When an NLO is serving as the fire brigade leader, the NLO number for each column in Table 16.13.1-1 must be increased by one. The number of NLOs that are fire brigade qualified may be reduced provided that a like number of fire brigade qualified personnel are provided from other organizations. This does not change the total number of NLOs required; only the number required to be fire brigade qualified.
2 NLO's – ADV	License Amendment 314, 314, 314 requires that staffing levels be increased by an additional two NLO's beyond those required in Table 16.13.1-1 when in Condition B of ITS 3.5.2. The additional NLO's are designated for the purpose of operating the Atmospheric Dump Valves (ADVs) for the unit under ITS 3.5.2 Condition B. In addition, the NLO's with the responsibility for operating the ADVs will be designated to respond to the control room within five minutes and will not be given duties that will prevent this from happening.
7 SPOC	Required by Volume A, Section B, Figure B-8 of the Emergency Plan and the Fire Plan (Volume A, Appendix 8, Spill Prevention and Control and Counter Measures Plan, Revision 98-04, 10/98). Implemented by OMP 1-7 and NSD 112. Consists of two I&E technicians ERO qualified and knowledgeable of IP/0/A0050/003 (Power SSF Submersible Pump), two MM technicians ERO qualified and knowledgeable of MP/0/A/1300/059 (Install SSF Submersible Pump), one supervisor or temporary supervisor qualified to establish the OSC and perform the OSC Maintenance Supervisor functions, and one additional person to help with pump installation as directed by SPOC supplied by one of the following groups in the order listed: SPOC, other maintenance personnel onsite,

C&F, Chemistry, RP and Maintenance Overtime resources. Security will automatically supply one Security Guard to open doors and gates who will also assist with any maintenance activities to be performed. The Security Guard is counted as one of a total of 6 people needed to install the submersible pump. One other person is needed to establish the OSC for a total of 7. In the event of a fire, SPOC will respond to the fire until directed to install the submersible pump. A total of 5 SPOC personnel are assigned to the fire brigade. Per PIP 4-O99-2987 problem evaluation, it is acceptable to consider these additional 5 Fire Brigade members to be available for other duties, such as installation of the SSF pump. This is based on Oconee Fire Brigade Guide #2, which contains guidance that allows fire brigade members to be released from the brigade for operational needs at the discretion of the OSC/TSC.

The number of SPOC personnel qualified as fire brigade members may be reduced, provided that the qualified fire brigade members from other organizations are increased by a like number. This does not change the total number of SPOC personnel required, only the number required to be fire brigade qualified.

1 Chemistry Technician - ERO	Required by Volume A, Section B, Figure B-8 of the Emergency Plan. Implemented by OMP and Station Chemistry Manual 2.6. A Chemistry Technician who is fire brigade qualified may be credited toward fulfilling the ERO requirement and the fire brigade requirement. In the event of a fire, the Chemistry technician will respond to the fire until directed otherwise.
3 RP Technicians	Three are required by Volume A, Section B, Figure B-8 of the Emergency Plan. One is required by ITS 5.2.2.d and may be counted towards fulfilling the ERO requirement. Implemented by HP/0/B/1000/054. RP technicians who are fire brigade qualified may be credited toward fulfilling the ERO and TS requirements and the fire brigade requirement. In the event of a fire, the RP technician will respond to the fire until directed

otherwise.

Minimum Station Staffing numbers for the SRO and RO positions in Table 16.13.1-1 change as a function of the number of units in MODES 1-4 and whether the operating Units are controlled from one or two Control Rooms. The number for the remaining positions in Table 16.13.1-1 is not affected by operational condition of the units.

- 10 CFR 50.54(m)(2)(i) requires 3 SROs when two units are in MODES 1-4 and controlled from two Control Rooms, 2 SROs when two units are in MODES 1-4 and controlled from a common control room, 2 SROs when one unit is MODES 1-4 and 1 SRO when no units are MODES 1-4. Thus considering fire brigade and ERO requirements, this results in the requirement for 5 SROs when two units are in MODES 1-4 and controlled from two Control Rooms, 4 SROs when two units are in MODES 1-4 and controlled from a common control room, 4 SROs when one unit is MODES 1-4 and 3 SROs when no units are MODES 1-4.

- 10 CFR 50.54(m)(2)(i) requires 5 ROs when two units are in MODES 1-4 and controlled from two Control Rooms, 4 ROs when two units are in MODES 1-4 and controlled from a common control room, 4 ROs when one unit is MODES 1-4 and 3 ROs when no units are MODES 1-4. OMPs require 2 ROs to man the SSF when two units are in MODES 1-3 and 1 RO when one unit is MODES 1-3. None are required when no units are in MODES 1-3. Therefore, no additional RO's are required beyond what is required by 10 CFR 50.54(m)(2)(i) when less than three units are in MODES 1-3 with one exception. When two units are in MODES 1-3 and controlled from one Control Room one additional RO is required since 10 CFR 50.54(m)(2)(i) only requires 4 RO's when the two operating units (Units 1 and 2) are controlled from one control room. Since one RO (or SRO) must be present in the Control Room when fuel is in the reactor vessel, the two RO's required to man the SSF for the operating units are exclusive of the one RO required for each unit. Therefore, a total of 5 RO's are required for this configuration.

The minimum staffing number for the SPOC and NLO positions is reduced by one when all three units are in MODE 4 or below. This reduction is allowed since the SSF is not required to be OPERABLE in these MODES. Therefore, there is no need for SPOC to provide a qualified individual to establish the OSC and no need for an NLO to perform SSF equipment verification.

SLC 16.13.1.a.1 requires at least one RO per unit to be present in the control room when fuel is in the reactor and one SRO to be present in the control room while in MODES 1-4. This requirement is based on 10 CFR 50.54(m)(2)(iii) and ITS 5.2.2.b. The first part of SLC 16.13.1.a.2, which requires at least one licensed operator to be in the reactor building when fuel handling operations in the reactor building were in progress, was relocated during the ITS conversion from TS Table 6.1-1, Additional Requirement 3. This requirement has existed since the initial issuance of Oconee Technical Specifications. The second part of SLC 16.13.a.2, which requires that a SRO or an SRO limited to fuel handling activities be present to directly supervise CORE ALTERATIONS including fuel loading or transfer and be assigned no other duties, is based on 10 CFR 50.54(m)(2)(iv). SLC 16.13.1.a.3 which requires an operator, in addition to those specified in ITS 5.2.2.b to supplement the control room staff if the computer

for a reactor is inoperable for more than eight hours, was relocated during the ITS conversion from TS Table 6.1-1, Additional Requirement 6. This requirement has also existed since the initial issuance of Oconee Technical Specifications. SLC 16.13.1.b, which specifies the STA shall be an experienced SRO was relocated during the ITS conversion from TS 6.1.1.9.

The primary purpose of the Fire Protection Program is to minimize both the probability and consequences of postulated fires. Despite designed active and passive Fire Protection Systems installed throughout the plant, a properly trained and equipped Fire Brigade organization of at least ten (Reference 8) members is needed to provide immediate response to fires that may occur at the site. This number is the result of a corrective action from Reference 10. This Fire Brigade requirement is normally met by using one SRO (or NLO qualified to be a fire brigade leader), 4 NLOs, and 5 SPOC personnel. However, this requirement can also be met by using personnel from other organizations (e.g., Chemistry, Radiation Protection, and Security).

Fire Brigade equipment and training conform to Oconee's commitments to Appendix A to Branch Technical Position 9.5-l and supplemental NRC Staff guidelines including Nuclear Plant Functional Responsibilities, Administrative Controls and Quality Assurance.

This SLC is part of the Oconee Fire Protection Program and therefore subject to the provisions of Oconee Facility Operating License Conditions.

The following requirement was relocated from the TS 6.1.1.8 during the conversion to ITS. A training program for the fire brigade shall meet or exceed the requirements of Section 27 of the NFPA Code-1975, except that training sessions may be held quarterly.

ACTIONS A.1

With the requirements for minimum station staffing not met, the minimum station staffing levels shall be restored within 2 hours. The 2 hour Completion Time is consistent with ITS 5.2.2.c and d which allows 2 hours to accommodate unexpected absence of on-duty shift crew members provided that immediate action is taken to restore the shift crew composition to within the minimum requirements.

REFERENCES:

1. Oconee UFSAR, Chapter 9.5.1.
2. Oconee Fire Protection SER dated August 11, 1978.
3. Oconee Fire Protection Review, (currently contained in the Fire Protection DBD) as revised.
4. Duke letter of January 16, 1978 to NRC in response to "Nuclear Plant Functional Responsibilities, Administrative Controls, and Quality Assurance".
5. ITS 5.2.2, Amendment 300/300/300.
6. 10 CFR 50.54(m).

7. Emergency Plan, Volume A, Section B, Figure B-8, Revision 97-01, 7/97.
8. Emergency Plan, Volume A, Appendix 8, Spill Prevention and Control and Counter Measures Plan, Revision 98-04, 10/98.
9. Station Chemistry Manual 2.6.
10. Problem Investigation Report Serial No. 1-089-0001.
11. Problem Investigation Process (PIP) Serial No. 4-O99-2987.
12. ITS 3.5.2, Amendment 314/314/314.

16.9 AUXILIARY SYSTEMS

16.9.18 Snubbers

COMMITMENT Hydraulic and Mechanical snubbers shall be OPERABLE to support systems and equipment required to be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.
MODES 5 and 6 for snubbers located on systems required to be OPERABLE in those MODES.

ACTIONS

----------NOTE----------
Separate Condition Entry is allowed for each snubber.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more snubbers inoperable.	A.1 Enter the applicable ACTIONS for any system(s) or component(s) made inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 16.9.18.1	Perform visual inspections of each snubber in accordance with Table 16.9.18-1.	----------NOTE---------- The provisions of SLC 16.2.7 do not apply. ---------- In accordance with Table 16.9.18-1

(continued)

Table 16.9.18-1 (page 1 of 3)
Snubber Visual Inspections

Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories is further divided into hydraulic or mechanical snubbers. Each of these categories (inaccessible hydraulic, inaccessible mechanical, accessible hydraulic, and accessible mechanical) may be inspected independently according to the schedule determined by criteria in this Table. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in this Table. The first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect in revision 3/27/99 to SLC 16.9.18.

Visual Inspection Acceptance Criteria

Visual inspections shall verify:

(1) that there are no visible indications of damage or impaired OPERABILITY,

(2) attachments to the foundation or supporting structure are secure,

(3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional, and

(4) In the event of a severe dynamic event, mechanical snubbers in that system which experienced the event shall be inspected during the refueling outage to assure that the snubbers have freedom of movement and are not seized. The inspection shall consist of verifying freedom of motion using one of the following: (i) Manually induced snubber movement, (ii) evaluation of in place snubber piston setting; (iii) stroking the mechanical snubber through its full range of travel. If one or more mechanical snubbers are found seized during this inspection, those snubbers shall be replaced (or overhauled) before exceeding MODE 5. Re-inspection shall subsequently be performed according to the schedule criteria listed below.

Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE. However, when the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be tested by starting with the piston at the as found setting and extending the piston rod in the tension mode direction. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

Table 16.9.18-1 (page 2 of 3)
Snubber Visual Inspections

SNUBBER VISUAL INSPECTION INTERVAL

Population or Category (Notes 1 and 2)	NUMBER OF UNACCEPTABLE SNUBBERS		
	Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must make and document that decision before any inspection and shall use that decision as the basis for determining the next inspection interval for that category.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.

Table 16.9.18-1 (page 3 of 3)
Snubber Visual Inspections

Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the difference in the numbers in Columns B and C.

Note 6: ± 25% is applicable for all inspection intervals up to and including 48 months.

Table 16.9.18-2 (page 1 of 2)
Snubber Functional Testing

At least once every 18 months +25%, a representative sample, a minimum of 10% of the total of hydraulic and a minimum of 10% of the total mechanical snubbers 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, an additional minimum of 10% of the snubbers shall be functionally tested until none are found inoperative or all have been functionally tested.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of hydraulic and mechanical snubbers. The representative sample shall be selected randomly from the total population of safety-related hydraulic and mechanical snubbers.

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included for the re-sampling, and failures shall not require additional testing of other snubbers.

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 hydraulic snubbers specifically required not to displace under continuous load, the ability of the hydraulic snubber to withstand load without displacement shall be verified.

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. (Measuring the time required to travel a known distance, under load, is an acceptable method.)

Table 16.9.18-2 (page 2 of 2)
Snubber Functional Testing

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.

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., is seized, an engineering evaluation will be performed to determine if the mode of failure could affect other snubbers of the same design. If confirmed, then reporting applicability under 10CFR Part 21 requirements will be assessed.

When a snubber is found inoperable, an engineering and/or operability evaluation will be performed in accordance with appropriate Station procedures.

BASES

BACKGROUND

Snubbers are designed to prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, while allowing normal thermal motion during startup or shutdown. The consequence of an inoperable snubber is an increase in the probability of structural damage to piping as a result of a seismic or other event initiating dynamic loads. It is therefore required that all snubbers required to protect the primary coolant system or any other safety system or component be operable during all MODES of required system/component OPERABILITY.

The requirement(s) of this SLC section were relocated from CTS 3.14 and 4.18 during the conversion to ITS.

APPLICABILITY

All snubbers are required OPERABLE in MODES 1 through 4 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 event initiating dynamic loads. Snubbers on safety-related systems required to be OPERABLE in MODES 5 and 6 are maintained OPERABLE to ensure the required systems are maintained OPERABLE. 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.

ACTION A.1

In the event one or more snubbers are inoperable, OPERABILITY of the affected system(s) and component(s) must be determined and/or the applicable ACTION(s) entered. If there is reasonable assurance of OPERABILITY of the affected system(s) or component(s) with an inoperable snubber(s), then it is not necessary to enter the respective ACTION(s). A snubber removed from service, for any reason, cannot be considered OPERABLE since it is no longer connected to the supported system or component.

SURVEILLANCE REQUIREMENTS

The visual inspection intervals have been revised to incorporate provisions of Generic Letter 90-09. The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. 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. 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 unless so determined, by the engineer, from a previous window of a schedule. Any inspection whose results require a shorter inspection interval will override the previous schedule.

BASES (continued)

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, and verified 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 operability 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.

To provide assurance of snubber functional reliability, a representative sample of the installed hydraulic snubbers will be functionally tested every 18 months. Observed failures of these sample snubbers shall require functional testing of additional units.

Hydraulic snubbers and mechanical snubbers may each be treated as a different entity for the above surveillance programs.

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Nuclear Regulatory Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubber for the applicable design conditions. Snubbers so exempted shall be listed in a permanent record which references the exemption letter date.

REFERENCES

1. Letter, NRC to H. B. Barron, Licensing Position Regarding Snubbers, July 9, 1999.
2. NRC Generic Letter 90-09