

May 30, 1989

Dr. Robert C. Mecredy, General Manager  
Nuclear Production  
Rochester Gas & Electric Corporation  
89 East Avenue  
Rochester, New York 14649

*See Correction letter  
of 7/3/90*

Dear Dr. Mecredy:

SUBJECT: ISSUANCE OF AMENDMENT NO. 37 TO DPR-18 - R. E. GINNA NUCLEAR  
POWER PLANT (TAC NO. 52404)

The Commission has issued the enclosed Amendment No. 37 to Facility Operating License No. DPR-18 for the R. E. Ginna Nuclear Power Plant in response to your application dated July 24, 1987 and supplemented May 4, 1988, June 21, 1988, and September 16, 1988, February 16, 1989 and March 14, 1989.

The amendment revises the Technical Specifications to reflect testing requirements for snubbers that ensure structural integrity of systems following a seismic or other event initiating dynamic loads.

A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance has been forwarded to the Office of the Federal Register for publication.

Sincerely,

*AS*  
Al Johnson, Project Manager  
Project Directorate I-3  
Division of Reactor Projects I/II

Enclosures:

- 1. Amendment No. 37 to License No. DPR-18
- 2. Safety Evaluation

cc w/enclosures:  
See next page

*concur subject to change. See clipped pgs.*

\*See previous concurrence

*c/p sent*

OFC :PDI-3*	:PDI-3*	: OGC	:DIR/PDI-3	:EMEB*		
NAME :MRushbrook	:PSears:ck	: <i>AM</i>	:RWessman	:LMarsh	:	:
DATE :04/03/89	:04/03/89	: <i>5/10/89</i>	: <i>5/17/89</i>	:04/13/89	:	:

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*DFOL  
1/1*

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-18 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 37, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

*RS*  
Richard H. Wessman, Director  
Project Directorate I-3  
Division of Reactor Projects I/II

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: May 30, 1989

\*See previous concurrence

OFC	: PD-3*	: PDI-3*	<i>ST</i> : OGC*	: DIR/PDI-3	:	:	:
NAME	: MRushbrook	: AJohnson:cb	:	: RWessman	:	:	:
DATE	: 4/03/89	: 4/03/89	: 5/10/89	<i>RS</i> : 4/17/89	:	:	:



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

May 30, 1989

Docket No. 50-244

Dr. Robert C. Mecredy, General Manager  
Nuclear Production  
Rochester Gas & Electric Corporation  
89 East Avenue  
Rochester, New York 14649

Dear Dr. Mecredy:

SUBJECT: ISSUANCE OF AMENDMENT NO. 37 TO DPR-18 - R. E. GINNA NUCLEAR  
POWER PLANT (TAC NO. 52404)

The Commission has issued the enclosed Amendment No. 37 to Facility Operating License No. DPR-18 for the R. E. Ginna Nuclear Power Plant in response to your application dated July 24, 1987 and supplemented May 4, 1988, June 21, 1988, and September 16, 1988, February 16, 1989 and March 14, 1989.

The amendment revises the Technical Specifications to reflect testing requirements for snubbers that ensure structural integrity of systems following a seismic or other event initiating dynamic loads.

A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance has been forwarded to the Office of the Federal Register for publication.

Sincerely,

*Patrick M. Sears*  
for Al Johnson, Project Manager  
Project Directorate I-3  
Division of Reactor Projects I/II

Enclosures:

1. Amendment No. 37 to License No. DPR-18
2. Safety Evaluation

cc w/enclosures:  
See next page

Dr. Robert C. Mecredy  
Rochester Gas and Electric Corporation

R. E. Ginna Nuclear Power Plant

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DATE May 30, 1989

AMENDMENT NO. 37 TO DPR-18 - R. E. GINNA NUCLEAR POWER PLANT

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PRC System

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S. Boger

W. Jones - P-522

D. Hagan

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R. Wessman

cc: Plant Service List



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

ROCHESTER GAS AND ELECTRIC CORPORATION

DOCKET NO. 50-244

R. E. GINNA NUCLEAR POWER PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 37  
License No. DPR-18

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Rochester Gas and Electric Corporation (the licensee) dated July 24, 1987 and supplemented May 4, 1988, June 21, 1988, September 16, 1988, February 16, 1989 and March 14, 1989, 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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PDR ADCK 05000244  
P PDC

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-18 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 37, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Richard R. Wessman, Director  
Project Directorate I-3  
Division of Reactor Projects I/II

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: May 30, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 37

FACILITY OPERATING LICENSE NO. DPR-18

DOCKET NO. 50-244

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change.

REMOVE

1-1a  
3.13-1 thru 3.13-7  
4.2-1 thru 4.2-2  
---  
4.14-1 thru 4.14-5  
---  
---

INSERT

1-1a  
3.13-1  
4.2-1 thru 4.2-2\*  
4.2.3\*  
4.14-1 thru 4.14-5  
4.14-6 thru 4.14-8\*\*  
6.10-3\*\*

\* No change in text

\*\* Denotes new page

#### 1.4

#### Operable-Operability

A system, subsystem, train, component or device shall be operable or have operability when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal or emergency electrical power sources (subject to Section 3.0.2), cooling or seal water, lubrication, supports, or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

### 3.13 Snubbers

#### Limiting Condition for Operation

3.13.1 With RCS conditions above cold shutdown, all safety-related snubbers shall be operable. This specification does not apply to those snubbers installed on non safety-related systems if the snubber failure, and a resulting failure of the supported non safety-related system shown to be caused by that snubber failure, would have no adverse effect on any safety-related system.

#### Action

3.13.2 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 4.14.1e on the supported component or declare the supported system inoperable and follow the appropriate action statement for that system.

#### Basis

Snubbers are required to be 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 event initiating dynamic loads.

Snubbers may be replaced by rigid structural supports (bumpers) provided an analysis is performed to demonstrate that appropriate acceptance criteria are satisfied for design basis seismic and pipe break events and provided that the bumpers are inspected periodically in a manner appropriate for rigid structural supports.

## 4.2

### Inservice Inspection

#### Applicability

Applies to the inservice inspection of Quality Groups A, B, and C Components, High Energy Piping Outside of Containment, Snubbers and Steam Generator tubes. It also applies to inservice pump and valve testing.

#### Objectives

To provide assurance of the continuing structural and operational integrity of the structures, components and systems in accordance with the requirements of 10 CFR 50.55a(g).

#### Specification

- 4.2.1 The inservice inspection program for Quality Groups A, B, and C Components, High Energy Piping Outside of Containment, Snubbers and Steam Generator tubes shall be in accordance with Appendix B of the Ginna Station Quality Assurance Manual. This inservice pump and valve testing program shall be in accordance with Appendix C of the Ginna Station Quality Assurance Manual. These inservice inspection programs shall define the specific requirements of the edition and Addenda of the ASME Boiler and Pressure Vessel Code, Section XI, which are applicable for the forty month period of the ten year inspection interval. The programs' ten year inspection interval shall be based on the following commencing dates.

- 4.2.1.1 The inspection interval for Quality Group A components shall be ten year intervals of service commencing on January 1, 1970.
- 4.2.1.2 The inspection intervals for Quality Group B and C Components shall be ten year intervals of service commencing with May 1, 1973, January 1, 1980, 1990 and 2000, respectively.
- 4.2.1.3 The inspection intervals for the High Energy Piping Outside of Containment shall be ten year intervals of service commencing May 1, 1973, January 1, 1980, 1990 and 2000, respectively. The inspection program during each third of the first inspection interval provides for examination of all welds at design basis break locations and one-third of all welds at locations where a weld failure would result in unacceptable consequences. During each succeeding inspection interval, the program shall provide for an examination of each of the design basis break location welds, and each of the welds at locations where a weld failure would result in unacceptable consequences.
- 4.2.1.4 The inspection intervals for Steam Generator Tubes shall be specified in the "Inservice Inspection Program" for the applicable forty month period commencing with May 1, 1973.

- 4.2.1.5 Inservice Inspection of ASME Code Class 1, Class 2 and Class 3 components (Quality Groups A, B, and C) shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the NRC pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).
- 4.2.1.6 The inspection interval for the Inservice Pump and Valve Testing Program shall be ten year intervals commencing with January 1, 1981, 1990 and 2000.
- 4.2.1.7 The inspection intervals for Snubbers shall be as defined in Specification 4.14.

#### Basis

The inservice inspection program provides assurance for the continued structural integrity of the structures, components and systems of Ginna Station. The programs comply with the ASME Boiler and Vessel Code Section XI "Rules for Inservice Inspection of Nuclear Power Plant Components" as practicable, with due consideration to the design and physical access of the structures, components and systems as manufactured and constructed. This compliance will constitute an acceptable basis for satisfying the requirements of General Design Criterion 32, Appendix A of 10 CFR Part 50 and the requirements of Section 50.55a, paragraph g of 10 CFR Part 50.

4.14 SNUBBER SURVEILLANCE REQUIREMENTS:

4.14.1 Each snubber required by Specification 3.13 to be operable shall be demonstrated operable by performance of the following inservice inspection program and the requirements of Specification 4.2.

a. Visual Inspections

The visual inspection period for snubbers under this program shall be based on the results of the previous inspections. Subsequent visual inspections shall be performed in accordance with the following schedule:

<u>No. Inoperable Snubbers of Each Type* Found During Inspection</u>	<u>Time Until Subsequent Visual Inspection**</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%

\* Type of snubber, as used in this specification, shall mean snubbers of the same design and manufacturer, irrespective of capacity.

\*\* 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.

Snubbers may be further categorized into two groups: those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify: (1) that there are no visible indications of damage or impaired operability, and (2) that the attachments to the foundation or supporting structure are secure. 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 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 4.14.1.d. 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 unless the test is started with the piston in the as-found setting, 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.

c. Functional Tests

At least once per 18 months during shutdown, a representative sample (at least 10% of the snubbers required by Specification 3.13) 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 4.14.1.d, an additional 10% of the snubbers shall be functionally tested until no more failures are found or until all snubbers have been functionally tested. The representative sample selected for functional testing shall, as far as practical, include the various configurations, operating environments, range of sizes and capacities of snubbers.

In addition to the regular sample, snubbers placed in the same locations as snubbers which failed the previous functional test shall be retested at the time of the next functional test. Additionally, if a failed snubber has been repaired and reinstalled in another location, that failed snubber shall also be retested. These snubbers shall not be included in the regular sample.

If during the functional testing, additional sampling is required due to failure of only one type of snubber, the functional testing results shall be reviewed at that time to determine if additional samples should be limited to the type of snubber which has failed the functional testing. Steam Generator snubbers are excluded from the functional testing requirements until the first refueling outage following completion of the SG snubber replacement program.

d. Functional Test Acceptance Criteria

The snubber functional test shall verify that:

- 1) Activation (restraining action) is achieved within the specified range in both tension and compression;
- 2) Snubber bleed, or release rate where required, is present in both tension and compression, within the specified range;
- 3) Where required, the force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel; and
- 4) For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement is verified.

Testing methods may be used to measure parameters indirectly or parameters other than those specified if those results can be correlated to the specified parameters through established methods.

e. Functional Test Failure Analysis

An analysis shall be made of each failure to meet the functional test acceptance criteria to determine the cause of the failure. The results of this analysis shall be used, if applicable, in selecting snubbers to be tested in an effort to determine the operability of other snubbers, irrespective of type, which may be subject to the same failure mode. For the specific case of a snubber selected for functional testing which either fails to activate 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 type subject to the same defect shall be functionally tested or evaluated in a manner to ensure their operability. Any testing performed as part of this requirement shall be independent of the requirements stated in Specification 4.14.1.c for snubbers not meeting the functional test acceptance criteria.

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

f. Snubber Seal Service Life Monitoring

The seal service life of hydraulic snubbers shall be monitored and seals replaced as required to ensure that the service life is not exceeded between surveillance inspections during a period when the snubber is required to be operable. The seal replacements shall be documented and the documentation shall be retained in accordance with Technical Specification 6.10.2.

Basis

Snubbers are provided 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. 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 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. 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, 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 the snubber rejected or are those which 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 of the supported component is performed in order to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. This evaluation is in addition to the determination of the snubber mode of failure. The engineering evaluation shall determine whether or not the snubber failure has imparted a significant effect on or caused degradation of the supported component or system, to ensure they remain capable of meeting the designed service.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at less than or equal to 18 month intervals. 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. The service life of a snubber is evaluated via manufacturer input and engineering information through consideration of the snubber service conditions and functional design requirements. The only snubber components with service lives not expected to exceed plant life are seals and o-rings fabricated from certain seal materials. Therefore, a seal replacement program is required to monitor snubber seal and o-ring service life to assure snubber operability is not degraded due to exceeding component service life.

- m. Records of the service lives of all hydraulic and mechanical snubbers listed in the Inservice Inspection Program including the date at which the service life commences and associated installation and maintenance records.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORTING AMENDMENT NO. 37 TO FACILITY OPERATING LICENSE NO. DPR-18

ROCHESTER GAS AND ELECTRIC CORPORATION

R. E. GINNA NUCLEAR POWER PLANT

DOCKET NO. 50-244

1.0 INTRODUCTION

Operating experiences, advances in the state-of-the-art, voids in some specific requirements, and nonuniform interpretations indicated the need for changes, clarifications, and improvements in the Standard Technical Specifications (STS) for inservice operability and surveillance requirements for shock suppressors (snubbers). To reflect accumulated experience obtained in the past years, the NRC staff issued Revisions 1 of the snubber STS. By generic letter dated March 23, 1981, to SEP Licensees, the NRC requested all licensees to incorporate the requirements of this STS revision into their plant specific Technical Specifications (TS).

The revised STS included:

- Addition of Mechanical snubbers to the surveillance program;
- Deletion of the requirements that seal materials receive NRC approval;
- Deletion of the blanket exemption for testing of greater than 50,000 lb. rated capacity snubber. (Snubbers of greater than 50,000 lb. capacity are now included in the test program);
- Addition of record keeping requirements;
- Provision for in-place testing; and
- Addition of a service life monitoring program.

## 2.0 DISCUSSION

In response to the NRC request, by letter dated November 24, 1981, the licensee submitted an application for license amendment and proposed TS changes for operability and surveillance requirements for snubbers. By letter dated July 24, 1987, the licensee resubmitted a revised proposed snubber TS change which superseded the previous request. The basis for the resubmittal was the NRC staff's request for additional information and discussions with cognizant licensee personnel regarding proposed TS changes. A facility inspection was conducted to review the procedural documentation needed for implementation of the TS, and to obtain clarification of several of the proposed changes.

## 3.0 EVALUATION

By letters dated July 24, 1987, May 4, 1988, June 21, 1988, September 16, 1988, February 16, 1989 and March 14, 1989 the licensee submitted revised proposed TS changes, and responses to the staff's questions and has evaluated the proposed snubber TS. The proposed amendment was noticed in the Federal Register on August 10, 1988. The subsequent letters of September 16, 1988, February 16, 1989 and March 14, 1989, did not substantially change the proposed amendment. The licensee's proposed TS is in substantial agreement with the model Standard Technical Specifications for Snubbers (STS) (Generic Letter 84-13). The proposed TS has clarified and increased snubber surveillance, defined testing and acceptance criteria, included mechanical snubbers in the surveillance program, and incorporated a service life monitoring program. Specifics of this evaluation are addressed below.

### 3.1 Operable - Operability (Proposed TS 1.4)

By letter dated June 21, 1988, the licensee proposed to amend the definition of TS 1.4 by inserting the word "supports" after the word "lubrication." The addition of the word "supports" provides for meeting the intent of STS 3.7.9 (reference NRC Generic Letter 84-13) to ensure Ginna snubber operability during cold shutdown conditions. The staff finds that this change improves the clarity of the Ginna TS, is consistent with the STS, and therefore is acceptable.

### 3.2 Limiting Condition for Operation (Proposed TS 3.13)

The licensee's proposed TS 3.13.1 requires all safety related snubbers to be operable when the reactor coolant system conditions are above cold shutdown. The addition of the word "supports" in proposed TS 1.4, Operable-Operability, also assures that snubbers will be operable when required by TS for system/subsystem operability; this includes cold shutdown conditions. The licensee's proposed Technical Specification 3.13.2 requires

specific actions where one or more snubbers are inoperable. These actions require within 72 hours that the inoperable snubbers be replaced or restored to operable status and an engineering evaluation be performed per Specification 4.14.13. The purpose of this engineering evaluation is to determine if the components, to which inoperable snubbers are attached, were adversely affected by the inoperability of the snubbers. This evaluation also assures that the affected component remains capable of meeting the designed service. Both the action and the engineering analysis requirements are consistent with STS 3.7.9 and 4.7.9c respectively, provided in the NRC Generic Letter 84-13. Therefore, the licensee's proposed TS 3.13.1 and 3.13.2 are acceptable.

3.3. Inservice Inspection (Proposed TS 4.2, 4.2.1 and 4.2.1.7)

Proposed TS 4.1 now includes snubbers in its scope of applicability. This section defines snubbers and other Quality Group components as those which are to be included in the Ginna Station Quality Assurance Manual, Appendix B, for snubbers. Appendix B has been revised to include a listing of those snubbers to be included in the program. Tables 8.1 and 8.2 of Appendix B are for safety related hydraulic and safety related mechanical snubbers, respectively. Table 3.13-1, "Safety Related Shock Suppressors (Snubbers)," of the present TS has been deleted in lieu of Tables 8.1 and 8.2 of Appendix B of the QA Manual. These actions are consistent with STS, therefore, the licensee's proposed TS 4.2 and its affected sections 4.2.1 and 4.1.7 are acceptable.

3.4 Snubber Surveillance Requirements (Proposed TS 4.14.1 and 4.14.1a thru f)

Proposed revision to TS 4.14.1 provides reference to the revised TS paragraph 3.13 and deletes the reference to the Table 3.13-1 which is being deleted by the revision.

Proposed TS 4.14.1a, "Visual Inspections" defines the inspection schedule to which the applicable snubbers in TS 4.14.1a and TS 4.2 must adhere. This schedule is consistent with STS 4.7.9 and therefore is acceptable. Other provisions in this section such as the definition of "type" of snubber, requirements for lengthening inspection intervals, and categorization of snubbers are consistent with either the STS or other previously approved specifications in the Catawba, McGuire, and Callaway plants.

Proposed TS 4.14.1b, "Visual Inspection Acceptance Criteria," describes acceptance criteria based on the STS for visual inspection acceptance criteria. This section is acceptable on that basis.

The licensee stated by letter dated June 21, 1988 that the steam generator snubbers are not functionally tested since lock up is not considered a credible failure for these specific snubbers. Ginna does periodically on a maximum of 10 year frequency remove, disassemble, clean, refurbish and hydrostatically test the steam generator snubbers. This periodicity falls within the seal service life for the snubber seals. Frequent seal inspections performed provide early detection of any seal degradation. All 16 steam generator snubbers have been refurbished twice since plant startup.

The existing Ginna TS exempt the steam generator snubbers from functional testing, however, the staff's review concluded that these snubbers should be included in the function testing program. Based upon the staff's conclusion, Ginna agreed by letter dated September 16, 1988, to revise their TS 4.14.1c. and initiate functional testing of the steam generator snubbers at the first refueling outage following completion of the steam generator snubber replacement program. The steam generator snubber replacement program reduces the total number of steam generator snubbers on each steam generator and when completed will provide an inventory of spare snubbers to support the steam generator snubber functional testing program. The staff concludes that testing the steam generator snubbers is consistent with the STS. The staff further concludes that the TS change made to 4.14.1c. to functionally test the steam generator snubbers beginning the first refueling outage following completion of the steam generator snubber replacement program is acceptable.

By letter dated June 21, 1988, the licensee stated that for mechanical snubbers functional test results are required by the following program. If drag force is not greater than 1% of snubber normal design load, the snubber may be installed in any location. If snubber drag force is between 1% and 5%, the snubber acceptability is based on a table correlating snubber size with pipe size. Over a 5% drag is considered unacceptable. However, any snubber with a drag force greater than 2% is considered degraded and is required to be repaired or replaced. The staff finds the licensee's acceptance criteria to be acceptable to maintain reliability consistent with that provided by the STS 4.7.9e.

Proposed TS 4.14.1c, "Functional Tests," and 4.14.1d, "Functional Test Acceptance Criteria," describe the requirements and acceptance criteria for functional testing. The provisions for inspection sampling are based on the existing Ginna TS, the existing Catawba, McGuire, and Callaway TS and are therefore acceptable. The provisions for the functional test acceptance criteria are consistent with the intent of STS and are also found acceptable.

Proposed TS 4.14.1e, "Functional Test Failure Analysis," requires analysis to be made of each failure to meet the functional test acceptance criteria to determine the cause of snubber failures. The provisions in this section with regard to failure analysis are based on and are consistent with the intent of those in the applicable sections of the STS. On this basis proposed TS Section 4.14.13 is acceptable.

Proposed TS 4.14.1f, "Snubber Seal Service Life Monitoring," defines monitoring requirements for the seal service life of hydraulic snubbers. It requires that seal replacements be documented in accordance with TS 6.10.2 which requires records to be kept for the duration of the Facility Operating License for inservice inspections (TS 6.10.2i) performed pursuant to the plant Technical Specifications. Furthermore, proposed TS 6.10.2m addresses record keeping for all hydraulic and mechanical snubbers directly. The provisions of this section are therefore consistent with the intent of the requirements in the corresponding section of the STS for snubber service life monitoring on this basis proposed TS Section 4.14.1f is found acceptable.

#### 3.4 Basis for TS 4.14a thru f

The bases for TS 4.14a thru f have been revised to support the proposed changes. These bases have been reviewed by the staff and have been found consistent with the bases of the STS. The provisions of TS 4.14a thru f are adequately addressed in these bases. This section therefore is found acceptable.

The staff has concluded that the licensee's proposed snubber TS have clarified and increased snubber surveillance, defined testing and acceptance criteria, included mechanical snubbers, eliminated inappropriate seal material approval, and included a service life monitoring program, all of which accomplished the objective of the NRC generic letter. Based on the evaluation as described herein, the staff finds the licensee's proposed snubber TS to be acceptable.

#### 4.0 ENVIRONMENTAL CONSIDERATION

Notice of Consideration by the staff of issuance of the proposed amendment was published in the Federal Register August 10, 1988 (53FR30123) and no comments or requests for hearing were received. The Commission also consulted with the State of New York and no comments were received. An Environmental Assessment and Finding of No Significant Impact was published in the Federal Register on May 22, 1989 (54FR22041). Based upon the EA, the staff has determined not to prepare an environmental impact statement for the proposed license amendment, and has concluded that the proposed action will not have a significant adverse effect on the quality of the human environment.

## 5.0 CONCLUSION

Based on the review of the analysis and results provided, the staff finds the changes to incorporate STS Snubber requirements into plant Technical Specifications are acceptable.

We have concluded, based on the considerations 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 the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: May 30, 1989

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