

May 29, 1985

Docket No. 50-333

Mr. J. P. Bayne  
First Executive Vice President,  
Chief Operations Officer  
Power Authority of the State  
of New York  
123 Main Street  
White Plains, New York 10601

Dear Mr. Bayne:

The Commission has issued the enclosed Amendment No. 92 to Facility Operating License No. DPR-59 for the James A. FitzPatrick Nuclear Power Plant. The amendment consists of changes to the Technical Specifications in response to your request dated July 13, 1981, as supplemented May 3, 1984, July 27, 1984 and January 18, 1985.

The amendment revises the Technical Specifications pertaining to operability and surveillance requirements for hydraulic and mechanical snubbers.

A copy of our Safety Evaluation is enclosed.

Sincerely,

Original signed by PHLeech for/

Harvey I. Abelson, Project Manager  
Operating Reactors Branch #2  
Division of Licensing

Enclosures:

1. Amendment No. 92 to License No. DPR-59
2. Safety Evaluation

cc w/enclosures:  
See next page

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

POWER AUTHORITY OF THE STATE OF NEW YORK

DOCKET NO. 50-333

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 92  
License No. DPR-59

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Power Authority of the State of New York (the licensee) dated July 13, 1981, as supplemented May 3, 1984, July 27, 1984 and January 18, 1985, 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.
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-59 is hereby amended to read as follows:

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(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 92, 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



Domenic B. Vassallo, Chief  
Operating Reactors Branch #2  
Division of Licensing

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: May 29, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 92

FACILITY OPERATING LICENSE NO. DPR-59

DOCKET NO. 50-333

Revise the Appendix "A" Technical Specifications as follows:

Remove

vi  
145a  
145b  
-  
-  
-  
-  
-  
156  
156a  
255

Insert

vi  
145a  
145b  
145c  
145d  
145e  
145f  
145g  
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156a  
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LIMITING CONDITION FOR OPERATION

3.6 (cont'd)

3.6.I Shock Suppressors (Snubbers)

Applicability

Applies to the operational status of the shock suppressors (snubbers).

Objective

To assure the capability of the snubbers to:

Prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, and

Allow normal thermal motion during startup and shutdown.

Specification

1. During all modes of operation except Cold Shutdown and Refueling, all snubbers which are required to protect the primary coolant system or any other safety related system or component shall be operable. During Cold Shutdown or Refueling mode of operation, only those snubbers shall be operable which are on systems that are required to be operable in these modes.
2. With one or more snubbers inoperable, within 72 hours during normal operation, or within 7 days

SURVEILLANCE REQUIREMENT

4.6 (cont'd)

4.6.I Shock Suppressors (Snubbers)

Applicability

Applies to the periodic testing requirement for the shock suppressors (snubbers).

Objective

To assure the operability of the snubbers to perform their intended functions.

Specification

Each snubber shall be demonstrated operable by performance of the following augmented inservice inspection program.

1. Snubbers shall be visually inspected in accordance with the following schedule:

<u>No. Inoperable Snubbers 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%

\* The inspection interval may not be extended more than one step at a time.

### 3.6 (cont'd)

during Cold Shutdown or Refueling mode of operation for systems which are required to be operable in these modes, complete one of the following:

- a. replace or restore the inoperable snubber(s) to operable status or,
  - b. declare the supported system inoperable and follow the appropriate limiting condition for operation statement for that system, or,
  - c. perform an engineering evaluation to demonstrate the inoperable snubber is unnecessary to assure operability of the system or to meet the design criteria of the system, and remove the snubber from the system.
3. With one or more snubbers found inoperable, within 72 hours perform a visual inspection of the supported component(s) associated with the inoperable snubber(s) and document the results. For all modes of operation except Cold Shutdown and Refueling, within 14 days complete an engineering evaluation as per Specification 4.6.I.6 to ensure that the inoperable snubber(s) has not adversely affected the supported component(s). For Cold Shutdown or Refueling mode, this evaluation shall be completed within 30 days.

### 4.6 (cont'd)

\* The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

2. Visual inspection shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movements can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up. 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 per Specifications 4.6.I.7 or 4.6.I.8, as applicable. Hydraulic snubbers which have lost sufficient fluid to potentially cause uncovering of the fluid reservoir-to-snubber valve assembly port or bottoming of the

4.6 (cont'd)

fluid reservoir piston with the snubber in the fully extended position shall be functionally tested to determine operability.

3. Once each operating cycle, 10% of each type of snubbers shall be functionally tested for operability, either in place or in a bench test. For each unit and subsequent unit that does not meet the requirements of 4.6.I.7 or 4.6.I.8, an additional 10% of that type of snubber shall be functionally tested until no more failures are found, or all units have been tested.
4. The representative sample selected for functionally 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:
  - a. The first snubber away from reactor vessel nozzle.
  - b. Snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.).
  - c. Snubbers within 10 feet of the discharge from a safety relief valve.

4.6 (cont'd)

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.

5. If any snubber selected for functional testing either fails to lockup or fails to move, i.e., is frozen in place, the cause will be evaluated and if due to manufacturer or design deficiency, 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.
6. 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 components remain capable of meeting the designed service requirements.

4.6 (cont'd)

7. The hydraulic snubber functional test shall verify that:
  - a. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
  - b. Snubber bleed, or 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.
8. The mechanical snubber functional test shall verify that:
  - a. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force. Drag force shall not have increased more than 50 % since the last functional test.
  - b. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

4.6 (cont'd)

c. 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.

9. Snubber Service Life Monitoring

A record of the service life of each snubber, whose failure could adversely affect the primary coolant or other safety-related system, the date at which the designated service life commences, and the installation and maintenance records on which the designated service life is based shall be maintained as required by specification 6.10.B.13.

At least once per operating cycle, the installation and maintenance records for each snubber, whose failure could adversely affect the primary coolant or other safety related system, shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be reevaluated or the snubber

4.6 (cont'd)

shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. This reevaluation, replacement or reconditioning shall be indicated in the records.

### 3.6 and 4.6 BASES (Cont'd)

at  $\pm 10$  percent and  $\pm 15$  percent of the average speed for the above and below 80 percent power cases, respectively. If the reactor is operating on one pump, the loop select logic trips that pump before making the loop selection.

Requiring the discharge valve of the lower speed loop to remain closed until the speed of the faster pump is below 50 percent of its rated speed provides assurance when going from one to two pump operation that excessive vibration of the jet pump risers will not occur.

#### I. Shock Suppressors

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 and shutdown. The consequences 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 reactor operation. Snubbers excluded from this inspection program 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. Because the snubber protection is required only during low probability

events, a period of 72 hours (for normal operation) or 7 days (for cold shutdown or refueling mode of operation) is allowed for repairs or replacement of the snubber prior to taking any other action. Following the 72 hour (or 7 day) period, the supported system must be declared inoperable and the Limiting Condition of Operation statement for the supported system followed. As an alternative to snubber repair or replacement an engineering evaluation may be performed: to demonstrate that the inoperable snubber is unnecessary to assure operability of the system or to meet the design criteria of the system; and, to remove the snubber from the system. With one or more snubbers found inoperable, within 72 hours a visual inspection shall be performed on the supported component(s) associated with the inoperable snubber(s) and the results shall be documented. For all modes of operation except Cold Shutdown and Refueling, within 14 days an engineering evaluation shall be performed to ensure that the inoperable snubber(s) has not adversely affected the supported component(s). For Cold Shutdown or Refueling mode, this evaluation shall be completed within 30 days. A period of 7 days has been selected for repair or replacement of the inoperable snubber during cold shutdown or refueling mode of operation because in these modes the relative probability of structural damage to the piping systems would be lower due to lower values of total stresses on the piping systems. In case a shutdown is required, the allowance of 36 hours to reach a cold shutdown condition will permit an orderly shutdown consistent with standard operating procedures.

### 3.6 and 4.6 BASES (Cont'd)

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 inspection 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 that have the same design features directly related to rejection of the snubber by visual inspection, and 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.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during each operating cycle. Selection of a representative sample of 10% of each type of safety related snubbers provides a confidence level within acceptable limits that these supports will be in an operable condition. 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 using manufacturer input and information and also through consideration of the 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.

(B) The following records shall be retained for the duration of the Facility Operating License:

1. Records of any drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
2. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
3. Records of facility radiation and contamination surveys.
4. Records of radiation exposure for all individuals entering radiation control areas.
5. Records of gaseous and liquid radioactive material released to the environs.
6. Records of transient or operational cycles for those facility components identified in Table 6.10-1.
7. Records of training and qualification for current members of the plant staff.
8. Records of in-service inspections performed pursuant to these Technical Specifications.
9. Records of Quality Assurance activities required by the Quality Assurance Manual.
10. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
11. Records of meetings of the PORC and the SRC.
12. Records for Environmental Qualification which are covered under the provisions of paragraph 6.15.
13. Records of the service life of all hydraulic and mechanical snubbers, whose failure could adversely affect any safety-related system, including the date at which the service life commences and associated installation and maintenance records as of the effective date of this amendment.

#### 6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared and adhered to for all plant operations. These procedures shall be formulated to maintain radiation exposures received during operation and maintenance as far below the limits specified in 10 CFR 20 as practicable. The procedures shall include planning, preparation, and training for operation and maintenance activities. They shall also include exposure allocation, radiation and contamination control techniques, and final debriefing.

Amendment No. *22, 21*, 92  
Order dated October 24, 1980



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 92 TO FACILITY OPERATING

LICENSE NO. DPR-59

POWER AUTHORITY OF THE STATE OF NEW YORK

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

DOCKET NO. 50-333

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 snubbers. To reflect accumulated experience obtained in the past several years, the NRC staff issued Revision 1 of the snubber STS. By NRC Generic Letters dated November 20, 1980 to Power Reactor Licensees (except SEP Licensees) and March 23, 1981 to SEP Licensees, the NRC requested all licensees to incorporate the requirements of this revision into their plant-specific Technical Specifications (TS).

The revised STS included:

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

By NRC Generic Letter dated May 3, 1984, the NRC advised that licensees may choose to request a license amendment to delete the tabular listing of snubbers from their TS.

2.0 DISCUSSION

In response to the NRC request, the licensee, by letter dated July 13, 1981, submitted an application for license amendment and proposed TS changes for operability and surveillance requirements for snubbers.

The initial review of the licensee's submittal was performed by the NRC staff and its contractor Lawrence Livermore National Laboratory (LLNL). LLNL prepared a Technical Evaluation Report (TER) No. UCID-19716 dated August 18, 1983, based on a comparison of the licensee's proposed TS with the STS and discussions with the licensee during an NRC/licensee meeting of June 22, 1983. The TER contained detailed information of the evaluation and an integral appendix that compared the licensee's proposed TS with the STS.

The TER concluded that the licensee's proposed TS required either additional modifications in order to conform to the STS or adequate justification for deviations. The NRC staff reviewed the TER and concurred with its basis and findings. By letter dated February 3, 1984, the NRC staff transmitted the TER to the licensee and requested a revised proposed TS be submitted.

The licensee's response letter dated May 3, 1984, provided the licensee's stated intent to modify the TS to agree with the majority of the TER positions. For several other of the TER positions, the licensee provided additional reasons why their plant specifics require variations from the STS. Shortly thereafter, by letter dated July 27, 1984, the licensee submitted revised proposed snubber TS changes.

The NRC staff review of the July 27, 1984 submittal determined there was a limiting condition for operation (LCO) omission of the STS requirement to perform an engineering evaluation on the supported components of inoperable snubbers. The licensee's latest resubmittal of revised TS, dated January 18, 1985, includes this requirement.

### 3.0 EVALUATION

By letter dated January 18, 1985 the licensee resubmitted its revised proposed snubber TS changes. The NRC staff has reviewed the licensee's resubmittal and verified that the TS were modified to include an LCO engineering evaluation of supported equipment requirement and Bases statements consistent with this requirement. The staff further determined that the licensee's resubmitted TS are in substantial agreement with the STS.

During the evaluation, the staff recognized that the licensee's TS are in the custom (non-STS) format and that there could be circumstances where a plant-specific approach is warranted. The staff's evaluation of the variations from the STS are addressed below.

#### 3.1 Cold Shutdown and Refueling Modes

The licensee's proposed TS 3.6.I.1 has been modified and now includes the STS Cold Shutdown and Refueling modes of applicability. The licensee's TS 3.6.I.2 contains the provision that, when in these modes snubbers are

required to be made operable within 7 days whenever the system in which they are installed is required to be operable. The licensee's TS Bases explains that total system stress is lower when in these modes and therefore relative probability of structural damage to piping systems would be lower.

The staff recognized that this plant is not a STS plant and during the proposed snubber TS review, the general format of other areas of the plant's TS were also reviewed. This review has shown that the 7 day provision is consistent with the plant's TS for other systems and equipment. Based on the licensee's TS inclusion of previously exempted Cold Shutdown and Refueling modes, recognition of the need for consistency with other TS requirements, and the licensee's Bases explanation, the staff finds the 7-day provision acceptable.

### 3.2 Engineering Evaluation to Declare Affected System Operable

The licensee's proposed TS 3.6.I.2.c contains an additional provision that, an engineering evaluation may be done to determine if the inoperable snubber is necessary for operation of the system or for meeting the design criteria of the plant. The proposed TS permits snubber removal if the evaluation determines the snubber is not required.

The staff has reviewed this additional licensee's TS provision and concludes that it is consistent with the STS objectives and that it contains the necessary supplemental provisions. Therefore the staff finds it acceptable.

### 3.3 Engineering Evaluation of Supported Components

The licensee's TS 3.6.I.3 has been modified to contain a provision to perform a documented visual inspection of supported components associated with inoperable snubbers within 72 hours. This is consistent with the STS. The licensee's TS also has been modified to contain provisions for an engineering evaluation to be performed on components supported by inoperable snubbers to ensure that there have been no adverse affects on the supported components.

The licensee's TS 3.6.I.3 contains a time frame of 14 days for completion of the engineering evaluation for all modes of operation except Cold Shutdown and Refueling. For Cold Shutdown and Refueling the licensee's time frame for completion of the engineering evaluation is 30 days.

The staff has evaluated the licensee's proposed TS time frames for completion of supported component engineering evaluations. The staff evaluation included review of the licensee's overall TS commitment which includes a documented visual inspection within 72 hours followed by more complete engineering evaluations to be performed in every instance.

The staff finds that the licensee's TS 3.6.I.3 provisions are consistent with the objectives of the November 20, 1980 Generic Letter as well as the STS and are, therefore, acceptable.

### 3.4 Functional Test Frequency

The licensee's proposed snubber TS 4.6.I.3 functional test frequency has been revised to "once each operating cycle" from "once each refueling cycle", whereas the STS provision is "once each 18 months during shutdown." The licensee's May 3, 1984 response to the TER described their reasons for the use of "operating cycle" as being consistent with other TS sections, and that functional testing during the operating cycle interval allows latitude to perform testing over the entire time period instead of the restrictive time span of an outage.

Because the proposed use of the term "operating cycle" meets the objective of the STS, which is to ensure that snubbers are tested at least once during each operating cycle (lasting, typically, around 18 months), the staff finds the proposed functional test frequency of "once each operating cycle" acceptable.

### 3.5 TS Snubber Tables

The licensee's tabular listing of snubbers has been deleted from the proposed snubber TS based on the NRC Generic Letter dated May 3, 1983.

The licensee's proposed snubber TS have been revised to include TS 4.6.I.9, "Service Life Monitoring," TS 6.10.B.13, "Record Keeping" and TS 3.6.I.1, "Bases Description of Applicable Snubbers," in keeping with the intent of the NRC Generic Letter dated May 3, 1984. Therefore the staff finds the licensee's proposed deletion of the snubber tabular listing 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 include a service life monitoring program. Based on the above evaluation, the staff finds that the licensee's proposed snubber TS meet the objectives of the above referenced Generic Letters as well as the STS and are, therefore, acceptable.

## 4.0 ENVIRONMENTAL CONSIDERATIONS

This amendment involves a change in the installation or use of a facility component located within the restricted area and changes in surveillance requirements as defined in 10 CFR Part 20. The staff has 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. The Commission has 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.

#### 5.0 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 the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Harold I. Gregg, Region I

Dated: May 29, 1985