

August 1, 1991

Docket Nos. 50-352  
and 50-353

Mr. George J. Beck  
Manager-Licensing, MC 5-2A-5  
Philadelphia Electric Company  
Nuclear Group Headquarters  
Correspondence Control Desk  
P.O. Box No. 195  
Wayne, Pennsylvania 19087-0195

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Dear Mr. Beck:

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2, SNUBBER VISUAL  
INSPECTION INTERVALS PER GL 90-09 (TSCR 90-18) (TAC NOS. 80281 AND  
80282)

On June 25, 1991, we issued Amendment Nos. 51 and 15 to Facility Operating  
Licenses 39 and 85, respectively. During reproduction of the package, page  
3/4 7-12 for Unit 2 was run on the back of page 3/4 7-11b for Unit 1 and page  
3/4 7-12 for Unit 1 was run on the back of page 3/4 7-11b for Unit 2. The  
requirements for both Units are the same. To avoid confusion, these corrected  
pages are enclosed. Also, replacement pages 3/4 7-11 and 3/4 7-11a for both  
units are enclosed with the respective Amendment Numbers added on pages 3/4 7-11.

I regret any inconvenience this may have caused you.

Sincerely,

Original signed by  
Richard J. Clark

Richard J. Clark, Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosures:

- Pages 3/4 7-11 and 3/4 7-11a,  
Units 1 and 2
- Pages 3/4 7-11b and 3/4 7-12,  
Units 1 and 2

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

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I regret any inconvenience this may have caused you.

Sincerely,

A handwritten signature in black ink that reads "Richard J. Clark". The signature is stylized with a large, looping initial "R".

Richard J. Clark, Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosures:

1. Pages 3/4 7-11 and 3/4 7-11a,  
Units 1 and 2
2. Pages 3/4 7-11b and 3/4 7-12,  
Units 1 and 2

cc w/enclosures:  
See next page

PLANT SYSTEMS

3/4.7.4 SNUBBERS

LIMITING CONDITION FOR OPERATION

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3.7.4 All snubbers shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3. OPERATIONAL CONDITIONS 4 and 5 for snubbers located on systems required OPERABLE in those OPERATIONAL CONDITIONS.

ACTION:

With one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.4g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

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

a. Inspection Types

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

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7.4-1. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7.4-1 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before amendment no. 51.

TABLE 4.7.4-1  
SNUBBER VISUAL INSPECTION INTERVAL

NUMBER OF UNACCEPTABLE SNUBBERS

Population or Category (Notes 1 and 2)	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 upon which to determine 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.

**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.

TABLE 4.7.4-1 (continued)  
SNUBBER VISUAL INSPECTION 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: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

SURVEILLANCE REQUIREMENTS (Continued)

c. 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, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are secure. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable 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 irrespective of type on that system that may be generically susceptible; and/or (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specifications 4.7.4f. For those snubbers common to more than one system, the OPERABILITY of such snubbers shall be considered in assessing the surveillance schedule for each of the related systems. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTIONS requirements shall be met.

d. Transient Event Inspection

An inspection shall be performed of all snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients, as determined from a review of operational data or a visual inspection of the systems, within 72 hours for accessible systems and 6 months for inaccessible systems following this determination. In addition to satisfying the visual inspection acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.

## PLANT SYSTEMS

### 3/4.7.4 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

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3.7.4 All snubbers shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3. OPERATIONAL CONDITIONS 4 and 5 for snubbers located on systems required OPERABLE in those OPERATIONAL CONDITIONS.

ACTION:

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#### SURVEILLANCE REQUIREMENTS

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

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b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7.4-1. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7.4-1 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before amendment no. 15.

TABLE 4.7.4-1  
SNUBBER VISUAL INSPECTION INTERVAL

NUMBER OF UNACCEPTABLE SNUBBERS

Population or Category (Notes 1 and 2)	Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
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TABLE 4.7.4-1 (continued)  
SNUBBER VISUAL INSPECTION 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: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

SURVEILLANCE REQUIREMENTS (Continued)

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Mr. George J. Beck  
Philadelphia Electric Company

Limerick Generating Station  
Units 1 & 2

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