

March 17, 1986

Docket No. 50-293

Mr. William D. Harrington
Senior Vice President, Nuclear
Boston Edison Company
800 Boylston Street
Boston, Massachusetts 02199

Dear Mr. Harrington:

SUBJECT: INSERVICE INSPECTION PROGRAM AND SNUBBER LIST

Re: Pilgrim Nuclear Power Station

The Commission has issued the enclosed Amendment No. 93 to Facility Operating License No. DPR-35 for the Pilgrim Nuclear Power Station (PNPS). This amendment is in response to your application dated April 17, 1985, as amended on September 24, 1985.

The amendment removes from the technical specifications the details of the ASME Boiler and Pressure Vessel Code Section XI Inservice Inspection Program and the tables listing snubbers and requires that they be placed in PNPS controlled documents. The amendment also deletes an obsolete snubbers basis discussion on page 151b of the technical specifications. In accordance with your February 28, 1986 request we have replaced bases page 150 with your revised bases page 150 (renumbered page 149).

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notices.

Sincerely,

Original signed by
John A. Zwolinski, Director
BWR Project Directorate #1
Division of BWR Licensing

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P PDR

Enclosures:

1. Amendment No. 93 to License No. DPR-35
2. Safety Evaluation

cc w/enclosures:
See next page

*SEE PREVIOUS CONCURRENCE

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CJamerson
02/26/86

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PLeech:
02/25/86

*OELD
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JZwolinski
3/17/86

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

March 17, 1986

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John A. Zwolinski, Director
BWR Project Directorate #1
Division of BWR Licensing

Enclosures:

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2. Safety Evaluation

cc w/enclosures:
See next page

Mr. William D. Harrington
Boston Edison Company

Pilgrim Nuclear Power Station

cc:

Mr. Charles J. Mathis, Station Mgr.
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RFD #1, Rocky Hill Road
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Resident Inspector's Office
U. S. Nuclear Regulatory Commission
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King of Prussia, Pennsylvania 19406

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Boston Edison Company
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

BOSTON EDISON COMPANY

DOCKET NO. 50-293

PILGRIM NUCLEAR POWER STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 93
License No. DPR-35

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Boston Edison Company (the licensee) dated April 17, 1985, as amended on September 24, 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 3.B of Facility Operating License No. DPR-35 is hereby amended to read as follows:

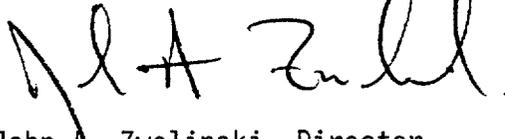
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B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 93 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective 30 days after the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, appearing to read "John A. Zwolinski". The signature is written in a cursive style with a large initial "J" and "Z".

John A. Zwolinski, Director
BWR Project Directorate #1
Division of BWR Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 17, 1986

ATTACHMENT TO LICENSE AMENDMENT NO. 93

FACILITY OPERATING LICENSE NO. DPR-35

DOCKET NO. 50-293

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

REMOVE

127
127A
127B
129
130
131
132
133
134
135
136
137
137a
137b
137d
137e
137f
137g
137h
137i
138A
149
150
151
151a
151b
224

INSERT

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127A
127B
137
137a
137b
137d
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150
151
224

3.6.D Safety Relief Valves (Con't)

from the initial discovery of discharge pipe temperatures in excess of 212°F for more than 24 hours without prior NRC approval of the engineering evaluation delineated in 3.6.D.3.

5. The limiting conditions of operation for the instrumentation that monitors tail pipe temperature are given in Table 3.2.F.

E. Jet Pumps

1. Whenever the reactor is in the startup or run modes, all jet pumps shall be operable. If it is determined that a jet pump is inoperable, an orderly shutdown shall be initiated and the reactor shall be in a Cold Shutdown Condition within 24 hours.

F. Jet Pump Flow Mismatch

1. Whenever both recirculation pumps are in operation, pump speeds shall be maintained within 10% of each other when power level is greater than 80% and within 15% of each other when power level is less than or equal to 80%.
2. If Specification 3.6.F.1 is exceeded immediate corrective action shall be taken. If recirculation pump speed mismatch is not corrected within 30 minutes, an orderly shutdown shall be initiated and the reactor shall be in the Cold Shutdown condition within 24 hours unless the recirculation pump speed mismatch is brought within limits sooner.

E. Jet Pumps

Whenever there is recirculation flow with the reactor in the startup or run modes, jet pump operability shall be checked daily by verifying that the following conditions do not occur simultaneously.

1. The two recirculation loops have a flow imbalance of 15% or more when the pumps are operated at the same speed.
2. The indicated value of core flow rate varies from the value derived from loop flow measurements by more than 10%.
3. The diffuser to lower plenum differential pressure reading on an individual jet pump varies from established jet pump P characteristics by more than 10%.

F. Jet Pump Flow Mismatch

Recirculation pump speeds shall be checked and logged at least once per day.

3.6.G Structural Integrity

1. The structural integrity of the primary system boundary shall be maintained at the level required by the ASME Boiler and Pressure Vessel Code, Section XI "Rules for Inservice Inspection of Nuclear Power Plant Components", Articles IWA, IWB, IWC, IWD and IWF and mandatory appendices as required by 10CFR50, Section 50.55a(g), except where specific relief has been granted by the NRC pursuant to 10CFR50, Section 50.55a(g)(6)(i).

4.6.G Structural Integrity

Inservice inspection of components shall be performed in accordance with the PNPS Inservice Inspection Program. The results obtained from compliance with this program will be evaluated at the completion of each ten year interval. The conclusions of this evaluation will be reviewed with the NRC.

LIMITING CONDITIONS FOR OPERATION

3.6.H High Energy Piping (outside containment)

1. The high energy line sections identified in Table 4.6.2 shall be maintained free of visually observable through-wall leaks.
2. If a leak is detected by the surveillance program of 4.6.H, efforts to identify the source of the leak shall be started immediately.
3. If the source of leakage cannot be identified within eight hours of detection or if the leak is found to be from the pressure retaining boundary in the sections identified in Table 4.6.2, the leak shall be isolated or the reactor shall be in a cold shutdown condition within 48 hours.
4. When the modifications, described in FSAR Amendment No. 34, to provide protection against high energy line breaks outside of the primary containment have been completed, Technical Specifications 3.6.H and 4.6.H will no longer be required.

SURVEILLANCE REQUIREMENTS

4.6.H High Energy Piping (outside containment)

The inspections listed in Table 4.6.2 shall be performed as specified to verify the structural integrity of the specified high energy line sections. The visual inspection for leakage shall be consistent with the requirements of ASME Boiler and Pressure Vessel Code, Section XI, 1980 Edition, Winter 1980 Addenda, Subarticle IWA-5240.

PAGES 129 THROUGH 136
ARE DELETED

TABLE 4.6.2

INSPECTION REQUIREMENTS FOR HIGH ENERGY
LINES OUTSIDE CONTAINMENT

<u>ITEM NO.</u>	<u>HIGH ENERGY AREA</u>	<u>INSPECTION METHOD*</u>	<u>FREQUENCY</u>
1.	Main steam lines outside containment from containment to turbine stop valves	Visual	Monthly When Operating
2.	HPCI steam line in torus area and in HPCI turbine area	Visual	Monthly When Operating
3.	RCIC steam line in valve compartment and pump compartment	Visual	Monthly When Operating
4.	RWCU line in pump, heat exchanger compartments and valve compartment	Visual	Monthly When Operating
5.	Feedwater lines outside containment to the reactor feedwater pump check valves	Visual	Monthly When Operating

* A visual inspection for indications of leakage from all design basis piping break locations.

3.6.I Shock Suppressors (Snubbers)

1. During all modes of operation except Cold Shutdown and Refuel, all safety-related snubbers listed in PNPS Procedures shall be operable except as noted in 3.6.I.2 through 3.6.I.3 below.

An Inoperable Snubber is a properly fabricated, installed and sized snubber which cannot pass its functional test.

Upon determination that a snubber is either improperly fabricated, installed or sized, the corrective action will be as specified for an inoperable snubber in Section 3.6.I.2.

2. From and after the time that a snubber is determined to be inoperable, replace or repair the snubber during the next 72 hours, and initiate an engineering evaluation to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubbers and to ensure that the supported component remains capable of meeting its intended function in the specific safety system involved.

Further corrective action for this snubber, and all generically susceptible snubbers, shall be determined by an engineering evaluation.

3. From and after the time a snubber is determined to be inoperable, improperly fabricated, improperly installed or improperly sized, if the requirements of Section(s) 3.6.I.1 and 3.6.I.2 cannot be met, then the affected safety system, or affected portions of that system, shall be declared inoperable, and the limiting condition for that system entered, as appropriate.

4.6.I Shock Suppressors (Snubbers)

The following surveillance requirements apply to all safety related hydraulic and mechanical snubbers listed in PNPS Procedures.

The required visual inspection interval varies inversely with the observed cumulative 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 time interval has elapsed may not be used to lengthen the required interval.

Number of snubbers found inoperable during inspection or during inspection interval:

<u>Inoperable Snubbers</u>	<u>Subsequent Visual Inspection Interval</u>
0	18 Months \pm 25%
1	12 Months \pm 25%
2	6 Months \pm 25%
3,4	124 Days \pm 25%
5,6,7	62 Days \pm 25%
8 or more	31 Days \pm 25%

The required inspection interval shall not be lengthened more than one step at a time.

Snubbers may be categorized in two groups, "accessible" or "inaccessible" based on their accessibility for inspection during reactor operation. These two groups may be inspected independently according to the above schedule.

1. Visual Inspection Acceptance Criteria
 - A. Visual inspections shall verify:

LIMITING CONDITIONS FOR OPERATION

3.6.I Shock Suppressors (Snubbers)

- 4. Snubbers may be added to, or removed from, per 10 CFR 50.59, safety related systems without prior NRC approval. The addition or deletion of snubbers shall be reported to the NRC in accordance with 10 CFR 50.59.

SURVEILLANCE REQUIREMENTS

4.6.I Shock Suppressors (Snubbers)

- 1. That there are no visible indications of damage or impaired operability.
- 2. Attachments to the foundation or support structure are such that the functional capability of the snubber is not suspect.

B. 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
- 2. The affected snubber is functionally tested, when necessary, in the as found condition and determined OPERABLE per specifications 4.6.I.2.B., 4.6.I.2.C., as applicable.
- 3. For any snubber determined inoperable per specification 4.6.I.2, clearly establish the cause of rejection and remedy the problem for that snubber, and any generically susceptible snubber.

2. Functional Tests (Hydraulic and Mechanical Snubbers)

A. Schedule

At least once per operating cycle (18 months), a representative sample (10% of the total of each type: hydraulic, mechanical) of 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 of

4.6.I Shock Suppressors (Snubbers)

of each snubber, 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.

- B. At least once per cycle, the installation and maintenance records for each safety related snubber listed in PNPS Procedures 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 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.
- C. This Snubber Service Life Monitoring Program shall become effective July 1, 1982.

(PAGES 137e THROUGH 137i
ARE DELETED)

(TABLE 4.6.2 PREVIOUSLY ON PAGE 138A
WAS MOVED TO PAGE 137)

Bases:

3.6.G and 4.6.G

Structural Integrity

The Pilgrim Nuclear Power Station Inservice Inspection Program conforms to the requirements of 10 CFR 50, Section 50.55a(g). Where practical, the inspection of ASME Section XI Class 1, 2, and 3 components conforms to the edition and addenda of Section XI of the ASME Boiler and Pressure Vessel Code required by 10 CFR 50, Section 50.55a(g). When implementation of an ASME Code required inspection has been determined to be impractical for PNPS, a request for relief from the inspection requirement is submitted to the NRC in accordance with 10 CFR 50, Section 50.55a(g)(5)(iii).

Requests for relief from the ASME Code inspection requirements will be submitted to the NRC prior to the beginning of each 10 year inspection interval for which the inspection requirement is known to be impractical. Requests for relief from inspection requirements which are identified to be impractical during the course of the inspection interval will be reported to the NRC on an annual basis throughout the inspection interval.

Certain ASME Code Class 1, Category B-J pressure retaining welds have been designated as Group I welds. These Group I welds shall be included in the sample of Class I welds requiring inspection during each ten year interval.

Bases:

3.6.H and 4.6.H

High Energy Piping Outside of Containment

Analyses performed and submitted to the AEC as Pilgrim Nuclear Power Station, Unit #1, FSAR Amendment #34 indicate that certain modifications to the station increase the protection against the potential effects of postulated high energy piping failures outside the primary containment. In order to provide greater assurance that the integrity of the high energy piping outside the primary containment is maintained at an acceptable level in the interim until these modifications can be completed, an increase in the frequency of inspections of the areas of concern has been initiated. The monthly visual inspection of high energy piping outside the containment while the station is operating provides greater assurance of the timely detection of postulated piping failures and allows appropriate corrective action to be performed. Reference to Subarticle IWA-5240 of the ASME Boiler and Pressure Vessel Code, Section XI, 1980 Edition, Winter 1980 Addenda, ensures that appropriate visual examination techniques are used to implement the requirements of Technical Specification Table 4.6.2. These visual examinations will normally be made with the indicated piping and insulation in its operating condition. Subsequent to the completion of the modifications, the inservice inspection requirements defined in Section 4.6.G of these Technical Specifications will provide adequate inspections to allow timely detection of postulated failures.

EASES:

3.6.I & 4.6.I

SHOCK SUPPRESSORS (SNUBBERS)

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 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 and all other safety related systems or components be operable during reactor operation.

The visual inspection frequency is based on maintaining a constant level of snubber protection to systems. The cumulative number of inoperable snubbers detected during any inspection interval is the basis for establishment of the subsequent inspection interval and the existing inspection interval should remain in effect until its completion.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber 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, and are exposed to the same environmental conditions such as temperature, radiation, and vibration.

When a snubber is found inoperable, an engineering evaluation is initiated, 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. Initiating this evaluation within 72 hours ensures that prompt corrective action will be afforded.

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 information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc...). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation. Due to the number and complexity of the relevant interacting factors necessary to develop a comprehensive Service Life Program, this program shall become effective July 1, 1982.

3. Special Reports

Special reports shall be submitted as indicated in Table 6.9.1.

6.10 RECORD RETENTION

A. The following records shall be retained for at least five years:

1. Records of facility operation covering time interval at each power level.
2. Records of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
3. Reportable Event Reports.
4. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
5. Records of reactor tests and experiments.
6. Records of changes made to Operating Procedures.
7. Records of radioactive shipments.
8. Records of sealed source leak tests and results.
9. Records of annual physical inventory of all source material of record.

B. The following records shall be retained for the duration of the Operating License:

1. Record and 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 the service lives of all hydraulic and mechanical snubbers listed in PNPS procedures 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. 93 TO FACILITY OPERATING LICENSE NO. DPR-35
BOSTON EDISON COMPANY
PILGRIM NUCLEAR POWER STATION
DOCKET NO. 50-293

1.0 INTRODUCTION

By letter dated April 17, 1985, the Boston Edison Company (licensee) submitted a proposed change to the Pilgrim Nuclear Power Station (PNPS) Technical Specifications (TS) relating to: (1) Inservice Inspection (ISI), and (2) Snubbers. The proposed TS changes will:

- (1) Remove the details of the ASME Section XI ISI Program from the TS and require them to be administratively handled through a PNPS controlled document.
- (2) Remove the tables listing snubbers from the TS and require the snubber listing to be maintained in PNPS Procedures.

By letter dated September 24, 1985, the licensee requested several editorial corrections and a basis page deletion which was overlooked in issuing a prior amendment.

2.0 EVALUATION

The ISI Program segments of the proposed TS change were reviewed against the applicable portions of 10 CFR Part 50 (1982); the ASME Code Section XI Editions Summer 1975 and Winter 1980; the plant TS; the NRC Standard TS; and NUREG 0123, Revision 3. Consistent with the rules of 10 CFR Part 50, Section 50.55a(g), this proposed change provides for performance of ISI in accordance with ASME Code Section XI and, therefore, does not result in a reduction of ISI scope. The proposed change is also similar to the BWR Standard TS in the area of ISI for code class 1, 2 and 3 components. Based on the above, the staff finds the licensee's transfer of ISI program details from the TS to a PNPS controlled document to be acceptable.

The staff has evaluated the licensee's proposed transfer of the snubber listing from the TS to a PNPS procedure and has found it to be in agreement with the guidance in NRC generic letter 84-13. The licensee's proposal also replaces TS references to the tables with references to the appropriate PNPS procedure and includes TS provisions which

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- . specify the snubbers required to be operable
- . require addition and removal of snubbers from safety-related systems per 10 CFR 50.59
- . require appropriate snubber data to be recorded
- . require appropriate records to be maintained

These proposed TS modifications relative to the snubber tables correspond with the generic letter 84-13 guidance; therefore, the staff finds these modifications to be acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment involves changes to requirements with respect to the use of facility components located within the restricted area as defined in 10 CFR Part 20 and changes to the surveillance requirements. 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 nor environmental assessment need be prepared in connection with the issuance of this amendment.

4.0 CONCLUSION

The staff has 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 nor to the health and safety of the public.

Principal Contributors: H. Gregg and H. Gray

Dated: March 17, 1986