September 7, 2001

Mr. David A. Christian
Senior Vice President - Chief Nuclear Officer
Innsbrook Technical Center
5000 Dominion Blvd.
Glen Allen, Virginia 23060-6711

SUBJECT: NORTH ANNA POWER STATION UNITS 1 AND 2 RE: ASME SECTION XI SUBSECTION IWF, INSERVICE INSPECTION (ISI) PROGRAM RELIEF REQUESTS CS-2 AND CS-3 (TAC NOS. MB2071 AND MB2072)

Dear Mr. Christian:

This letter grants the relief you requested in Relief Requests CS-2 and CS-3 for North Anna Power Station, Units 1 and 2.

By letter dated May 30, 2001, as supplemented June 6, 2001, Virginia Electric and Power Company (VEPCO) requested relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, with regard to the functional testing and replacement of snubbers.

Our evaluation and conclusions are contained in the enclosed Safety Evaluation. Relief Requests CS-2 and CS-3 for North Anna Unit 1 address snubber functional testing requirements associated with the 1989 Edition of the ASME Code, Section XI, for the third 10-year ISI interval. Requests CS-2 and CS-3 for North Anna Unit 2 address snubber functional testing requirements and replacement activities associated with the 1986 Edition of the ASME Code, Section XI, for the second 10-year ISI interval.

The staff has concluded that the requirements of Section XI of the ASME Code are impractical for the snubber functional testing requirements and replacement activities, and reasonable assurance of structural integrity is provided by the proposed examinations. Therefore, relief request CS-2 for North Anna Unit 1 is authorized pursuant to Title 10 of the *Code of Federal Regulations* Section 50.55a(g)(6)(i) for the snubber functional testing performed during the Spring 2000 refueling outage for the third 10-year ISI interval. Likewise, relief requests CS-2 and CS-3 for North Anna Unit 2 are authorized pursuant to 10 CFR 50.55a(g)(6)(i) for the second 10-year ISI interval respectively. With regard to Relief Request CS-3 for North Anna Unit 1, your proposed alternative provides an acceptable level of quality and safety. You are authorized to use your proposed alternative pursuant to 10 CFR 50.55a(a)(3)(i) for the third 10-year ISI interval.

The staff has completed its evaluation of this request; therefore, we are closing TAC Nos. MB2071 and MB2072.

Sincerely,

/RA by Gordon E. Edison for/

Richard L. Emch, Jr., Chief, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-338 and 50-339

Enclosure: As stated

cc w/encl: See next page

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Units 1 and 2

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REQUESTS FOR RELIEF CS-2 AND CS-3

SECOND AND THIRD 10-YEAR INTERVAL INSERVICE INSPECTION

NORTH ANNA POWER STATION, UNITS 1 AND 2

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NOS. 50-338 AND 50-339

1.0 INTRODUCTION

By letter dated May 30, 2001, as supplemented June 6, 2001, Virginia Electric and Power Company (VEPCO, the licensee) requested relief from the functional testing requirements of the 1989 Edition of the American Society of Mechanical Engineers (ASME) Code, Section XI, IWF-5200 and IWF-5300, and IWA-2110 for Unit 1. In addition, the licensee requested relief from the functional testing requirements of the 1986 Edition of the ASME Code, Section XI, IWF-5000 and IWA-2110, and the snubber testing requirements of the 1986 Edition of the ASME Code, Section XI, Article IWA-7000 and IWA-2110, for Unit 2.

2.0 BACKGROUND

The inservice inspection (ISI) of the ASME Code Class 1, 2, and 3 components is to be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel (B&PV) Code and applicable addenda as required by Title 10 of the *Code of Federal Regulations (*10 CFR) Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). Section 50.55a(a)(3) states that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if: (i) the proposed alternatives would provide an acceptable level of quality and safety, or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements, except the design and access provisions and the pre-service examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b) 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The applicable editions of Section XI of the

ASME Code for the North Anna Unit 1 third 10-year ISI inspection interval and the North Anna Unit 2 second 10-year ISI interval are the 1989 Edition and 1986 Edition, respectively.

Pursuant to 10 CFR 50.55a(g)(5), if the licensee determines that conformance with an examination requirement of Section XI of the ASME Code is not practical for its facility, information will be submitted to the Commission in support of that determination and a request must be made for relief from the ASME Code requirement. After evaluation of the determination, pursuant to 10 CFR 50.55a(g)(6)(i), the Commission may grant relief and/or may impose alternative requirements that are determined to be authorized by law, will not endanger life, property, or the common defense and security, and are otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed.

3.0 EVALUATION

3.1 **Request for Relief CS-2, Unit 1**

CODE REQUIREMENTS

ASME Code, 1989 Edition, Section XI, requires inservice testing to be performed on Class 1, 2, and 3 snubbers in accordance with Subsections IWF-5200 and IWF-5300, and the associated snubber testing review performed by the Authorized Nuclear Inservice Inspector (ANII) per IWA-2110.

LICENSEE'S BASIS FOR REQUESTING RELIEF

> The Final Rulemaking *Federal Register* (FR) [notice (64 FR 51369), September 22, 1999] endorsed the 1995 ASME [Code] Section XI through the 1996 Addenda for use by licensees performing 10-year [ISI] updates. Within the discussion, references were made that the new rules, as well as the old, required the testing of snubbers per ASME Section XI, IWF-5000. This discussion acknowledged that previous *Federal Register* Rulemaking discussions (reference 62 FR 63903; December 3, 1997) on snubber testing may have been confusing with regard to the applicability of 10 CFR 50.55a and snubber testing. The discussion in the earlier FR notice (1997) appeared to direct licensees to Technical Specifications for testing requirements of snubbers. [This 1997 *Federal Register* notice stated that inservice testing of snubbers is governed by plant Technical Specifications and, thus, has never been included in 10 CFR 50.55a.] Regardless, the discussion in the 1999 FR notice directs licensees to follow the requirements of IWF-5000 noting that the requirement has been in effect since 1978.
>
> North Anna Unit 1 has completed a first period, third interval refueling outage to the criteria of Technical Specifications for snubber testing requirements. Only one refueling outage remains in the first period, which started May 1, 1999. The ISI program was developed assuming that snubbers were required to be functionally tested in accordance with Technical Specifications and not with the ASME Section XI Code, IWF-5000. This assumption was based upon earlier interpretations of the *Federal Register* Rulemaking discussion (reference 57 FR 34666, August 6, 1992), which explicitly states that 10 CFR 50.55a does not specify requirements for the testing of snubbers. The FR notice states that requirements for the testing of snubbers are generally governed by plant Technical Specifications. As such, the North Anna ISI

Program submitted to the NRC for the third ten-year interval only states that the testing of snubbers will be developed in accordance with plant Technical Specifications. No relief request from Section XI, Subsection[s] IWF-5200 and IWF-5300 was developed at that time, as none was thought necessary.

The North Anna Unit 1, Class 1, 2, and 3 snubbers have been functionally tested as required by plant Technical Specification 4.7.10. Technical differences between the Code and the Technical Specification requirements are minor (e.g., size of sample populations, Technical Specifications has a larger initial sample for testing, additional examination requirements as a result of failures are different, but accomplish the same purpose), and the testing being performed continues to assure component operability. Testing results were reviewed as required by the quality assurance program, however there was no ANII [Authorized Nuclear Inservice Inspector] involvement since none was necessary.

Given the direct reference to IWF-5000 in the 1999 *Federal Register* notice, a Code relief request is necessary to permit the Technical Specifications functional testing requirements to serve as the sole requirement for snubber testing performed to date for [the] North Anna Unit 1 third interval. Since no IWF-5000 snubber testing has been performed and the past refueling outage is completed, the completion of Code requirements referenced are considered impractical and relief is requested per 10 CFR 50.55a(g)(5)(iv).

LICENSEE'S PROPOSED ALTERNATE REQUIREMENTS

In lieu of the Code requirements specified in IWF-5200 and IWF-5300 for snubber inservice testing and IWA-2110 concerning the ANII review of snubber testing results, the functional testing requirements of North Anna Technical Specification 4.7.10 shall be followed.

The proposed alternative stated above ensures that the overall level of plant quality and safety will not be, nor has been compromised. This relief request is only applicable to the snubber functional testing performed during the Spring 2000 refueling outage.

STAFF EVALUATION

The staff has reviewed the licensee's submittal of May 30, 2001, as supplemented June 6, 2001, and has determined that the alternative testing requirements of the Technical Specifications meet the intent of the ASME Code Section XI requirements. Since no IWF-5000 snubber testing has been performed in past refueling outages, completion of the referenced Code requirements is considered impractical. In addition, the staff finds that the Technical Specifications snubber testing requirements provide reasonable assurance of structural integrity. Therefore, pursuant to 10 CFR 50.55a(g)(6)(i), the relief request is approved for the snubber functional testing of the Unit 1 third 10-year ISI interval, first period, performed during the Spring 2000 refueling outage.

3.2 **Request for Relief CS-3, Unit 1**

CODE REQUIREMENTS

The ASME Code, Section XI, 1989 Edition, paragraphs IWF-5200 (b) and IWF-5300 (b) require the use of the ASME/ANSI OM-1987, Part 4 (published in 1988) Code to perform the preservice and inservice tests of Class 1, 2, and 3 Snubbers.

LICENSEE'S BASIS FOR REQUESTING RELIEF

Integration of Section XI and OM (or alternatively ISTD) Codes into an effective coherent testing program along with associated required changes to the Technical Specifications would require a significant amount of administrative activity (e.g., administrative procedure changes, reconciliation of Code requirement differences, technical procedure changes, etc.). These actions are considered a hardship given there is no commensurate increase in safety due to such integration.

An alternative approach to establish these administrative requirements for functional testing would be to revise the Technical Specifications to reference the appropriate paragraphs of the OM or ISTD document. However, many of the requirements being removed from the existing Technical Specifications would be very similar, if not identical to the requirements being added. Again, this results in a significant amount of administrative activity, without enhancement in quality and safety. A third approach, which is proposed, provides a means to accomplish the examination and testing required by the Code and regulation with a minimum of burden.

The current testing requirements of Technical Specification 3/4.7.10 formed the basis of the North Anna Unit 1 inservice testing program for snubbers for the past ISI interval (2^{nd} interval). Virginia Electric and Power Company [VEPCO] continues to believe that the current Technical Specification 3/4.7.10 functional testing requirements [provide] an acceptable level of quality and safety for inservice testing of snubbers. Additionally, the continued implementation of a program based on Technical Specifications requires no administrative program change or Technical Specification changes.

However, to comply with the preservice testing requirements of the Code verbatim, additional testing activity is required beyond the above proposal for inservice activities. Therefore, [VEPCO] proposes that the inclusion of the testing requirements contained in paragraph ISTD 5, "Preservice Operability Testing" into the current snubber surveillance program provides an alternative with an acceptable level of safety and quality for the preservice testing requirements. The inclusion of these requirements into the snubber surveillance program achieves the preservice inspection requirements of the Code with only small administrative impact. No other requirements of ISTD will be implemented as part of this alternative.

LICENSEE'S PROPOSED ALTERNATE REQUIREMENTS

Dominion proposes as an alternative to the Code requirements stated in Section II, a snubber testing program comprised of the following elements:

1) The preservice testing requirements of ISTD (ASME OMa 1996, Section IST) paragraph ISTD 5, “Preservice of Operability Testing,” and

2) The continued implementation of the surveillance requirements of Technical Specification 3/4.7.10, “Snubbers,” without change, and

No other requirements of IST Code will be implemented as part of this alternative for snubber testing.

[VEPCO] submits that the proposed alternative snubber testing program provides an acceptable level of quality and safety without the burden of substantial administrative changes to comply with Code requirements that add little or no value to quality or safety. Therefore, having met the criteria of 10 CFR 50.55a(a)(3)(i), an authorization to implement the alternative is requested for the remaining part of the third inspection interval.

STAFF EVALUATION

The staff has reviewed the licensee’s submittal of May 30, 2001, as supplemented June 6, 2001, and has determined that Relief Request CS-3 for Unit 1 meets the intent of the ASME Code, Section XI, requirements and provides assurance of snubber operability and component integrity. Therefore, the staff finds that the alternative proposed in the relief request provides an acceptable level of quality and safety and is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the remaining part of the Unit 1 third 10-year ISI interval.

3.3 **Request for Relief CS-2, Unit 2**

CODE REQUIREMENTS

Code requirements of Section XI of the ASME Boiler and Pressure Vessel Code, 1986 Edition, IWF-5000 on Class 1, 2, and 3 snubbers, and the associated snubber testing review performed by the Authorized Nuclear Inservice Inspector (ANII) in IWA-2110.

LICENSEE’S BASIS FOR REQUESTING RELIEF

The Final Rulemaking in the *Federal Register* (FR) [notice (64 FR 51369), September 22, 1999] endorsed the 1995 ASME [Code] Section XI through the 1996 Addenda for use by licensees performing 10-year [ISI] updates. Within the discussion, references were made that the new rules, as well as the old, required the testing of snubbers per ASME Section XI, IWF-5000. [The *Federal Register* notice acknowledged, however, that the previous *Federal Register* notice (62 FR 63903; December 3, 1997) on snubber testing was confusing in regard to the regulatory requirement for inservice testing of snubbers. This 1997 *Federal Register* notice stated that inservice testing of snubbers is governed by plant Technical Specifications and, thus, has never been included in 10 CFR 50.55a.] Regardless, the discussion in the 1999 notice directs licensees to follow the requirements of IWF-5000 noting that the requirement has been in effect since 1978.

North Anna Unit 2 is currently completing second interval requirements using the 1 year extension allowed by the Code (Interval dates 12/14/90 to 12/14/00). The snubber testing program was developed assuming that snubbers were required to be functionally tested in accordance with Technical Specifications and not with the ASME Section XI Code, IWF-5000. The assumption was based upon previous interpretations of the *Federal Register* Rulemaking discussion (reference 57 FR 34666, August 6, 1992) which explicitly states that 10 CFR 50.55a does not specify requirements for the testing of snubbers. The FR notice states that requirements for the testing of snubbers are generally governed by plant Technical Specifications. This position was consistent with conversations with other Code participants at the time of the program development. As such, the North Anna [Unit 2] ISI Program NRC Submittal for the second ten-year interval only states that the testing of snubbers will be developed in accordance with plant Technical Specifications. No relief request from Section XI, Subsection IWF-5000 was developed at the time, as none was thought necessary.

The North Anna Unit 2, Class 1, 2, and 3 snubbers have been functionally tested as required by plant Technical Specification 4.7.10. Technical differences between the Code and Technical Specification requirements are minor (e.g., size of sample populations, Technical Specifications has a larger initial sample for testing, additional examination requirements as a result of failures are different, but accomplish the same purpose), and the testing being performed continued to assure component operability. Testing results were reviewed as required by the quality assurance program, however there was no ANII involvement since none was necessary.

Given the direct reference to IWF-5000 in the 1999 *Federal Register* Notice, a Code relief request is necessary to close out the interval for North Anna Unit 2 using only the Technical Specifications functional testing requirements as the sole applicable requirement. Title 10 CFR 50.55a(g)(5)(iv) allows submittal of relief requests for impractical requirements within a year following the end of the interval. Since no IWF-5000 snubber testing has been performed over the interval and the interval time period is complete, completion of the Code requirements referenced are considered impractical and relief is requested per 10 CFR 50.55a(g)(5)(iv).

LICENSEE'S PROPOSED ALTERNATE REQUIREMENTS

In lieu of the Code requirements specified in IWF-5000 for snubber inservice testing and IWA-2110 concerning the ANII review of snubber testing results, the functional testing requirements of North Anna Technical Specification 4.7.10 shall be followed.

The proposed alternative testing identified above ensures that the overall level of plant quality and safety has not been compromised for the second inspection interval.

STAFF EVALUATION

The staff has reviewed the licensee's submittal of May 30, 2001, as supplemented June 6, 2001, and has determined that the licensee's proposed alternative testing method ensures that the overall level of plant quality and safety has not been compromised for the second inspection interval. In addition, the staff finds that Technical Specification 4.7.10 snubber testing requirements provide reasonable assurance of structural integrity. Therefore, pursuant to

10 CFR 50.55a(g)(6)(i), the relief request is approved for North Anna Unit 2's second 10-year ISI interval based on the consideration that the interval time period is complete and completion of the Code requirements is considered impractical.

3.4 **Request for Relief CS-3, Unit 2**

CODE REQUIREMENTS

Replacement of Class 1, 2, and 3 snubbers and snubber component parts shall meet the requirements of ASME Section XI, 1986 Edition, Article IWA-7000, and IWA-2110 with regard to duties of the Inspector.

LICENSEE'S BASIS FOR REQUESTING RELIEF

As a result of independent audit, a discrepancy was identified in the North Anna Unit 2 ASME Section XI, Repair and Replacement Program concerning the replacement of snubbers for the purpose of functional testing. The problem identified is associated with a misinterpretation of Code requirements by both the plant and the Authorized Inspection Agency. The discrepancy has been reported as a plant issue (N-2001-0518), and requires the submittal of this relief request to close out interval requirements.

Near the start of the second inspection interval (Interval dates 12/14/90 to 12/14/00) an interpretation was agreed to between the Authorized Inspection Agency and the plant regarding snubber change-outs for testing purposes. The snubber change-outs were being treated as a maintenance activity. Since it was treated as a maintenance activity, it was considered not under the jurisdiction of the ASME Section XI Repair and Replacement Program. Therefore, no repair or replacements were performed to ASME Section XI for these snubber activities. The agreement limited ASME Section XI repair and replacements to new snubbers coming into the plant population and snubber failures requiring repair or replacement. Snubber tracking, seal life monitoring, functional testing, and visual examinations were all administered and maintained by complying with the plant Technical Specifications.

Recently, the Authorized Inspection Agency reversed its position noting that ASME XI Code Case N-508-1, "Rotation of Serviced Snubbers and Pressure Relief Valves for the Purpose of Testing," approved May 11, 1994, provided alternative rules to IWA-7000 for snubber and relief valve replacements. As the Code Case addressed the activities considered previously as maintenance, the previous interpretation was considered in error and a relief request would be necessary to use Code Case N-508-1 or similar alternative to the Code repair and replacement requirements for interval close-out.

As many as 90 snubbers have been changed-out to facilitate snubber testing during a given refueling outage. Typically the snubber is changed-out with a previously tested equivalent snubber on the maintenance shelf, while testing is performed on the removed snubber. The practice is considered very efficient with minimized outage impact. A comparison of previous plant practices to the requirements of Code Case N-508-1 identifies substantial agreement.

a) Items removed and installed were of the same design and construction, or a repair and replacement program was initiated;

b) Items removed had no evidence of failure at the time of removal, or a repair and replacement program was initiated;

c) Items rotated were removed and installed only by mechanical means, or a repair and replacement program was initiated;

d) Items installed were previously in service, or a repair and replacement program was initiated;

e) Preservice inspections were performed in accordance with visual procedures that met plant Technical Specification acceptance criteria using a VT-3 qualified examiner. The Code Case requirement to perform preservice examinations following hot functional or power ascension tests (IWF-2200(b)) is different, however, the plant performed an examination after installation and subsequent Technical Specification visual examinations of snubbers are performed at least every other refueling outage;

f) The snubbers are tracked to ensure traceability of inspection and testing records;

g) No NIS-2 documentation was completed unless a repair or replacement was required as previously discussed;

h) Testing of snubbers including expansion was in accordance with Technical Specifications;

i) Code repair and replacement requirements were followed for new snubbers and snubber failures in accordance with the 1986 Edition of ASME Section XI.

The services of the Authorized Nuclear Inservice Inspector (ANII) to review the Code Case requirements, including testing and preservice examination requirements, would be expected as part of the Code Case implementation. As this activity was considered maintenance, no ANII involvement was obtained. However, the activities were performed in accordance with the plant's quality assurance, Appendix B Program. Since this relief addresses historical or retrospective performance without remedy, compliance with the Code requirements at this time is considered impractical and relief is necessary.

LICENSEE'S PROPOSED ALTERNATE REQUIREMENTS

The requirements specified in Code Case N-508-1 be authorized per 10 CFR 50.55a(g)(5)(iv) as an alternative with the following exceptions during the second inspection interval:

(1) Preservice inspection and testing shall meet Technical Specification testing requirements, and Technical Specification visual inspection requirements using a qualified VT-3 examiner, and

(2) ANII duties associated with the Code Case shall be waived for these snubber activities.

STAFF EVALUATION

The staff has reviewed the information provided in the licensee's submittal of May 30, 2001, as supplemented June 6, 2001. The staff determined that the licensee's snubber maintenance program meets the intent of the proposed alternative requirements of Code Case N-508-1, and thus, ensures that the overall level of plant quality and safety has not been compromised during the second 10-year ISI interval. In addition, the staff finds that use of Code Case N-508-1 along with the Technical Specification testing and visual inspection requirements provide reasonable assurance of structural integrity. Based on the consideration that the interval time period is complete and completion of the Code requirements is considered impractical, the relief request is, therefore, approved pursuant to 10 CFR 50.55a(g)(6)(i) for the Unit 2 second 10-year ISI interval.

4.0 CONCLUSION

The staff concluded that with respect to Relief Request CS-2 for Unit 1, the licensee has presented an adequate justification for its relief request from the requirements of ASME Code, 1989 Edition, Section XI, with regard to snubber functional testing of Code Class 1, 2, and 3 snubbers. The staff concurs with the licensee that the proposed alternative using Technical Specification requirements ensures that the overall level of plant quality and safety has not been and will not be compromised, and that the completion of Code requirements is considered impractical. In addition, the staff finds that the Technical Specification snubber testing requirements provide reasonable assurance of structural integrity. Therefore, the proposed alternative is authorized pursuant to 10 CFR 50.55a(g)(6)(i) for the snubber functional testing performed during the Spring 2000 refueling outage of the Unit 1 third 10-year ISI interval. The relief granted is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

The staff concluded that with respect to Relief Request CS-3 for Unit 1, the licensee has presented an adequate justification for its request for relief from the requirements of ASME Code, 1989 Edition, Section XI, with regard to snubber functional testing of Code Class 1, 2, and 3 snubbers. The staff concurs with the licensee that the proposed alternative snubber testing program, with the inclusion of the preservice operability testing requirements of ISTD 5, OM Code, 1995 Edition through 1996 Addenda, provides an acceptable level of quality and safety without the burden of substantial administrative changes to comply with Code requirements that add little or no value to quality or safety. Therefore, the proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the snubber functional testing for the remaining part of the Unit 1 third 10-year ISI interval.

The staff also concluded that with respect to Relief Requests CS-2 and CS-3 for Unit 2, the licensee has presented an adequate justification for its request for relief from the requirements of ASME Code, 1986 Edition, Section XI, with regard to snubber functional testing and replacement of Code Class 1, 2, and 3 snubbers. The staff concurs with the licensee that the proposed alternatives of snubber functional testing and replacement program ensure that the overall level of plant quality and safety has not been compromised, and that the completion of Code requirements is considered impractical. In addition, the staff finds that use of Code Case N-508-1 along with the Technical Specification testing requirements provide reasonable assurance of structural integrity.

Therefore, the proposed alternatives are authorized pursuant to 10 CFR 50.55a(g)(6)(i) for the snubber functional testing and snubber replacement already performed during the Unit 2 second ISI interval. The relief granted is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

Principal Contributor: A. Lee

Date: September 7, 2001