

October 22, 1991

Docket Nos. 50-335  
and 50-389

DISTRIBUTION  
See attached sheet

Mr. J. H. Goldberg  
President-Nuclear Division  
Florida Power and Light Company  
P.O. Box 14000  
Juno Beach, Florida 33408-0420

Dear Mr. Goldberg:

SUBJECT: ST. LUCIE UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE: SNUBBER  
INSPECTIONS (TAC NOS. 81379 AND 81380)

The Commission has issued the enclosed Amendment Nos. 110 and 51 to Facility  
Operating License Nos. DPR-67 and NPF-16 for the St. Lucie Plant, Unit Nos. 1  
and 2. These amendments consist of changes to the Technical Specifications  
in response to your application dated August 22, 1991.

These amendments make line-item improvements to the St. Lucie, Unit 1 and  
Unit 2 Technical Specifications in accordance with Generic Letter 90-09,  
"Alternative Requirements for Snubber Visual Inspection Intervals and  
Corrective Actions." Please note that in accordance with Note 1 of Table  
4.7-3, the results from the previous inspection performed under the old  
technical specification can be used to determine the next inspection  
interval.

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

Sincerely,

(Original Signed By)

Jan A. Norris, Senior Project Manager  
Project Directorate II-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

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PDR ADDOCK 05000335  
PDR

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Enclosures:

1. Amendment No. 110 to DPR-67
2. Amendment No. 51 to NPF-16
3. Safety Evaluation

cc w/enclosures:  
See next page

**NRC FILE CENTER COPY**

\*See Previous Concurrence

OFC	:LA:PDII-2	:PM:PDII-2	:D:PDII-2	:OGC	:C:EMEB:NRR	:	:
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DATE	:10/22/91	:10/27/91	:10/23/91	:9/26/91	:10/11/91	:	:

*Handwritten initials/signature*

Mr. J. H. Goldberg  
Florida Power & Light Company

St. Lucie Plant

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DATED: October 22, 1991

AMENDMENT NO. 110 TO FACILITY OPERATING LICENSE NO. DPR-67 - ST. LUCIE, UNIT 1  
AMENDMENT NO. 51 TO FACILITY OPERATING LICENSE NO. NPF-16 - ST. LUCIE, UNIT 2

Docket File

NRC & Local PDRs

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

FLORIDA POWER & LIGHT COMPANY

DOCKET NO. 50-335

ST. LUCIE PLANT UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 110  
License No. DPR-67

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Florida Power & Light Company, et al. (the licensee), dated August 22, 1991, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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2. Accordingly, Facility Operating License No. DPR-67 is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and by amending paragraph 2.C.(2) to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 110, 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

*for Rapender Aubuele*

Herbert N. Berkow, Director  
Project Directorate II-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: October 22, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 110  
TO FACILITY OPERATING LICENSE NO. DPR-67  
DOCKET NO. 50-335

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

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PLANT SYSTEMS

3/4 7.10 SNUBBERS

LIMITING CONDITION FOR OPERATION  
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3.7.10 All safety related snubbers shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

ACTION:

With one or more safety related snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS  
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4.7.10 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

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 or accessible) may be inspected independently according to the schedule determined by Table 4.7-3. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in Table 4.7-3 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

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

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c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional. 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, provided that (i) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type that may be generically susceptible; and (ii) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per specifications 4.7.10.e and 4.7.10.f, as applicable. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next inspection interval. 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 ACTION requirements shall be met.

TABLE 4.7-3  
SNUBBER VISUAL INSPECTION INTERVAL

Population or Category (Notes 1 and 2)	NUMBER OF UNACCEPTABLE SNUBBERS		
	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

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

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- 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.
- 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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d. Functional Tests

At least once per 18 months during shutdown, a representative sample (10% of the safety related snubbers) shall be functionally tested either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria of Specification 4.7.10.e or 4.7.10.f, an additional 10% of that type of snubber shall be functionally tested. Functional test shall continue until no additional snubbers are found inoperable or all safety related snubbers have been tested.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers.

Snubbers identified as "Especially Difficult to Remove" or in "High Exposure Zones During Shutdown" shall also be included in the representative sample.\* Safety related hydraulic snubber listings and safety related mechanical snubber listings may be used jointly or separately as the basis for the sampling plan.

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 shall not result in additional functional testing due to failure.

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\*Permanent or other exemptions from the functional testing for individual snubbers in these categories may be granted by the Commission only if justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)  
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If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated and if caused by manufacturer or design deficiency, all snubbers of the same 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.

e. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
2. Snubber bleed, or release rate, where required, is within the specified range in compression or tension.

f. Mechanical Snubbers Functional Test Acceptance Criteria

The mechanical snubber functional test shall verify that:

1. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force.
2. Activation (restraining action) is achieved in both tension and compression.

g. Snubber Service Life Monitoring

A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designed service life is based shall be maintained as required by Specification 6.10.2.1.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, the installation and maintenance records for each safety related snubber shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded by more than 10% prior to the next scheduled snubber service life review. If the indicated service life will be exceeded by more than 10% 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. The results of the reevaluation may be used to justify a change to the service life of the snubber. This reevaluation, replacement or reconditioning shall be indicated in the records.

TABLE 3.7-2a

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ST. LUCIE - UNIT 1

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Amendment No. 27, 37, 44, 83

JUL 27 1987



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

FLORIDA POWER & LIGHT COMPANY

ORLANDO UTILITIES COMMISSION OF

THE CITY OF ORLANDO, FLORIDA

AND

FLORIDA MUNICIPAL POWER AGENCY

DOCKET NO. 50-389

ST. LUCIE PLANT UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 51  
License No. NPF-16

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Florida Power & Light Company, et al. (the licensee), dated August 22, 1991, 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, Facility Operating License No. MPF-16 is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and by amending paragraph 2.C.2 to read as follows:

2. Technical Specifications

- The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 51, 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

*Rajender Anand*

*for*

Herbert N. Berkow, Director  
Project Directorate II-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: October 22, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 51  
TO FACILITY OPERATING LICENSE NO. NPF-16  
DOCKET NO. 50-389

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

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## PLANT SYSTEMS

### 3/4 7.9 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

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3.7.9 All safety-related snubbers shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.

#### ACTION:

With one or more safety related snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.9f. on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

#### SURVEILLANCE REQUIREMENTS

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

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 or accessible) may be inspected independently according to the schedule determined by Table 4.7-2. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in Table 4.7-2 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

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

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c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional. 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, provided that (i) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type that may be generically susceptible; and (ii) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per specification 4.7.10.e. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next inspection interval. 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 ACTION requirements shall be met.

TABLE 4.7-2  
SNUBBER VISUAL INSPECTION INTERVAL

Population or Category (Notes 1 and 2)	NUMBER OF UNACCEPTABLE SNUBBERS		
	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

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

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- 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.
- 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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d. Functional Tests

During the first refueling shutdown and at least once per 18 months thereafter during shutdown, a representative sample of either:

(1) At least 10% of the total of each type of safety related snubber in use in the plant shall be functionally tested either in place or in a bench test. For each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.9e. an additional 10% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested or (2) A representative sample of each type of snubber shall be functionally tested in accordance with Figure 4.7-1. "C" is the total number of snubbers of a type found not meeting the acceptance requirements of Specification 4.7.9e. The cumulative number of snubbers of a type tested is denoted by "N". At the end of each day's testing, the new values of "N" and "C" (previous day's total plus current day's increments) shall be plotted on Figure 4.7-1. If at any time the point plotted falls in the "Reject" region, all snubbers of that type design shall be functionally tested. If at any time the point plotted falls in the "Accept" region, testing of that type of snubber shall be terminated. When the point plotted lies in the "Continue Testing" region, additional snubbers of that type shall be tested until the point falls in the "Accept" region or the "Reject" region, or all the snubbers of that type have been tested.

The representative sample selected for functional testing shall include the various configurations, operating environments, and the range of size and capacity of snubbers of each type. The representative sample should be weighted to include more snubbers from severe service areas such as near heavy equipment. Snubbers placed in the same location as snubbers which failed the previous functional test shall be included in the next test lot if the failure analysis shows that failure was due to location.

e. Functional Test Acceptance Criteria

The snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range in both tension and compression.
2. Snubber bleed, or release rate where required, is present in both tension and compression, within the specified range.
3. Where required, the force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

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Functional Test Acceptance Criteria (Continued)

4. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement.
5. Fasteners for attachment of the snubber to the component and to the snubber anchorage are secure.

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

f. Functional Test Failure Analysis

An engineering evaluation shall be made of each failure to meet the functional test acceptance criteria to determine the cause of the failure. The results of this evaluation shall be used, if applicable, in selecting snubbers to be tested in an effort to determine the OPERABILITY of other snubbers irrespective of type which may be subject to the same failure mode.

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

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same type subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated in Specification 4.7.9.e for snubbers not meeting the functional test acceptance criteria.

g. Functional Testing of Repaired and Replaced Snubbers

Snubbers which fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers which have repairs which might affect the functional test result shall be tested to meet the functional test criteria before installation in the unit. These snubbers shall have met the acceptance criteria subsequent to their most recent service, and the functional test must have been performed within 12 months before being installed in the unit.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)  
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h. Snubber Seal Replacement Program

The seal service life of hydraulic snubbers shall be monitored to ensure that the seals do not fail between surveillance inspections. The maximum expected service life for the various seals, seal materials, and applications shall be estimated based on engineering information and the seals shall be replaced so that the maximum expected service life does not expire during a period when the snubber is required to be OPERABLE. The seal replacements shall be documented and the documentation shall be retained in accordance with Specification 6.10.2.

i. Exemption From Visual Inspection or Functional Tests

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubber for the applicable design conditions at either the completion of their fabrication or at a subsequent date.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 110 AND 51

TO FACILITY OPERATING LICENSE NOS. DPR-67 AND NPF-16

FLORIDA POWER & LIGHT COMPANY, ET AL.

ST. LUCIE PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-335 AND 50-389

1.0 INTRODUCTION

By letter dated August 22, 1991, Florida Power and Light Company (FPL, the licensee) proposed to amend Facility Operating Licenses DPR-67 and NPF-16 for St. Lucie Units 1 and 2, respectively. These amendments would remove the present surveillance requirements for snubbers in the Technical Specifications for both units and replace them with the alternative requirements contained in Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions."

2.0 EVALUATION

The snubber visual examination schedule in the existing Technical Specifications is based on the permissible number of inoperable snubbers found during the visual examination. Because the existing snubber visual examination schedule is based only on the absolute number of inoperable snubbers found during the visual examinations irrespective of the total population of snubbers, licensees with a large snubber population find the visual examination schedule excessively restrictive. The purpose of the alternative visual examination schedule is to allow the licensee to perform visual examinations and corrective actions during plant outages without reduction of the confidence level provided by the existing visual examination schedule. The new visual examination schedule specifies the permissible number of inoperable snubbers for various snubber populations. The basic examination interval is the normal fuel cycle up to 24 months. This interval may be extended to as long as twice the fuel cycle, or reduced to as small as two-thirds of the fuel cycle, depending on the number of unacceptable snubbers found during the visual examination. The examination interval also may vary by  $\pm 25$  percent to coincide with the actual outage.

In the event one or more snubbers are found inoperable during a visual examination, the Limiting Conditions for Operation (LCO) in the present TS require the licensee to restore or replace the inoperable snubber(s) to

operable status within 72 hours or declare the attached system inoperable and follow the appropriate action statement for that system. This LCO will remain in the TS. However, the permissible number of inoperable snubber(s) and the subsequent visual examination interval will now be determined in accordance with the new visual examination schedule (Table 4.7-2 of Generic Letter 90-09 dated December 11, 1990). As noted in the guidance for this line-item TS improvement, certain corrective actions may have to be performed depending on the number of inoperable snubbers found. All requirements for corrective actions and evaluations associated with the use of the visual examination schedule and stated in the footnotes 1 thru 6 (Table 4.7-2 of Generic Letter 90-09) shall be included in the TS.

The licensee has proposed changes to Specifications 4.7.10 and 4.7.9 for Unit 1 and Unit 2, respectively, that are consistent with the guidance provided in Generic Letter 90-09 for the replacement of the snubber visual examination schedule with Table 4.7-2 (including footnotes 1 thru 6) of the Generic Letter 90-09. For that reason, and also because the alternative requirements will result in a reduced occupational radiological exposure to the plant personnel, the staff finds the proposed changes acceptable.

### 3.0 STATE CONSULTATION

Based upon the written notice of the proposed amendments, the Florida State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

These amendments change surveillance requirements. The NRC staff has determined that the amendments involve 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 the amendments involve no significant hazards consideration and there has been no public comment on such finding (56 FR 47238). Accordingly, these amendments meet 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 these amendments.

### 5.0 CONCLUSION

The Commission 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: J. A. Norris

Date: October 22, 1991