



Palo Verde Nuclear
Generating Station

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10 CFR 50.55.a

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December 27, 2001

U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Docket Nos. STN 50-528/529/530
Second 10-Year Interval Inservice Inspection Program – Request for
Relief Number 5**

Pursuant to 10 CFR 50.55a(a)(3)(i), Arizona Public Service Company (APS) hereby requests the use of an alternative to the inservice inspection requirements of 10 CFR 50.55a(g). The provisions of 10 CFR 50.55a(g) specify compliance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, and applicable addenda. The alternative proposed in Request for Relief Number 5 is for the examination and testing of snubbers for preservice, inservice, and repair/replacement activities.

Relief Request No. 5, provided in the enclosure, requests approval to use the examination and testing program currently defined in the Palo Verde Technical Requirements Manual (TRM) TSR 3.7.101.1 which provides an Augmented Inservice Inspection Program for snubbers. The proposed alternative would allow a single program and standard for snubber examination and testing activities.

APS requests approval by March 01, 2002 to support the tenth refueling outage of PVNGS Unit 2.

No commitments are being made to the NRC by this letter.

Should you have any questions, please contact Thomas N. Weber at (623) 393-5764.

Sincerely,

David Mauldin

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Enclosure:

- ASME Section XI Relief Request No. 5 To The Second 10 - Year Interval Inservice Inspection Program For The Palo Verde Nuclear Generating Station

Attachments:

1. Technical Requirements Manual Section 3.7.101

cc: E. W. Merschoff
L. R. Wharton
J. H. Moorman

ENCLOSURE

ASME SECTION XI RELIEF REQUEST NO. 5

TO THE SECOND 10 - YEAR INTERVAL

INSERVICE INSPECTION PROGRAM

FOR THE PALO VERDE NUCLEAR GENERATING STATION

Relief Request No. 5
Inservice Inspection Requirements for Snubbers

Code Class: 1, 2 and 3
Code Reference: ASME Boiler and Pressure Vessel Code, Section XI, 1992 Edition, 1992 Addenda, ASME/ANSI OM Part 4 Edition and OMa-1988 Addenda to OM-1987 Edition
Examination Category: N/A
Item Numbers: N/A
Component Description: All safety related hydraulic and mechanical snubbers.
PVNGS Units: All

Requirement ASME XI, IWF-5000, Inservice Inspection Requirements for Snubbers, states that preservice examinations and tests of snubbers (IWF-5200), inservice examinations and tests of snubbers (IWF-5300), and examination and tests of snubber repairs and replacements (IWF-5400) shall be performed using VT-3 visual examination methods performed per ASME/ANSI OM Part 4.

ASME/ANSI OM Part 4, Section 2.3, Inservice Examination, requires an 18 month frequency and categorizing failures into failure mode groups.

ASME/ANSI OM Part 4, Section 3.2, Inservice Operability Testing, requires categorizing failures into failure mode groups.

ASME XI, IWA-2110 requires Authorized Nuclear Inservice Inspector (ANII) involvement for snubber examination and testing.

ASME XI, IWA-6200 requires that Inservice Inspection Summary Report for snubbers be prepared and filed with the regulatory authority.

Relief Request Pursuant to 10CFR50.55a(a)(3)(i), APS is requesting relief from requirements of ASME Code, 1992 Edition, Section XI, Article IWF-5000 with regard to visual examination and functional testing of Code Class 1, 2, and 3 snubbers for preservice, inservice, and repair/replacement activities. This relief request pertains to the Second 10-Year Interval Inservice Inspection Program for PVNGS Units 1, 2, and 3.

Relief Request No. 5
Inservice Inspection Requirements for Snubbers

Alternate
Testing

APS proposes to use the examination and testing program currently defined in the Palo Verde Nuclear Generating Station (PVNGS) Technical Requirements Manual (TRM) TSR 3.7.101.1, Augmented Inservice Inspection Program (Attachment 1) for the examination and testing of snubbers for preservice, inservice, and repair/replacement activities. Snubber examination and testing data will be maintained in accordance with the requirements of PVNGS UFSAR Section 17.2.6, Control of Documents and Records and TRM TSR 3.7.101.1, Augmented Inservice Inspection Program.

Basis For
Relief

PVNGS TRM TSR 3.7.101.1, Augmented Inservice Inspection Program (Attachment 1), examines and tests ASME Section XI Class 1, 2, and 3 equivalent snubbers.

Examination and testing of the snubbers in accordance with both ASME Section XI and the plant TRM results in a duplication of effort utilizing different standards. This results in unnecessary radiological exposure and additional cost without a compensating increase in the level of quality and safety. ASME/ANSI OM Part 4 imposes overlapping requirements which do not enhance the quality or safety of the subject snubber examination and testing program. The current TRM program, defined by TSR 3.7.101.1, provides for a level of quality and safety equal to or greater than that provided by OMa-1988 Part 4 and utilizes NRC guidance not incorporated into the OM Code referenced by the 1992 Edition, 1992 Addenda of ASME Section XI.

The areas inclusive of the pins back to building structure and to the component / piping being supported will remain in the ASME Section XI examination, repair and replacement boundary.

The following items outline the essential differences between the two programs:

Scope of Snubbers

ASME IWF-1230 allows for exempting from the examination requirements of IWF-5000 those snubbers that are connected to components exempted under IWB-1220, IWC-1220, IWD-1220, and IWE-1220. The scope of snubbers examined and tested in accordance with TRM TSR 3.7.101.1 is a numerically greater population of snubbers than what the Section XI program would require.

Relief Request No. 5
Inservice Inspection Requirements for Snubbers

Basis For
Relief (cont'd)

The snubbers examined and tested in accordance with TRM TSR 3.7.101.1 are not limited by line size or other applicable code exemptions. All hydraulic and mechanical snubbers are required to be operable with the exception of those installed on non-safety related systems and then only if their failure or failure of the system they are on would have no adverse effect on any safety related system.

VT-3 Examinations

IWF-5000 requires use of the VT-3 visual examination method described in IWA-2213 for examining snubbers. ASME IWA-2310 requires personnel performing snubber visual examinations to be certified VT-3 in accordance with ANSI/ASNT CP-189, *Standard for Qualification and Certification of Nondestructive Testing Personnel*. This is an additional certification as compared to the qualification required to perform the TRM required examinations.

Personnel performing the TRM required visual examinations are qualified in accordance with ANSI/ANS 3.1-1978, *Selection and Training of Nuclear Power Plant Personnel*. They are process qualified to perform the examinations and testing required by the TRM. While VT-3 certification is not required by the TRM, the methods used to perform TRM required visual examination are consistent with IWA-2213, VT-3 Examination. In addition to visual tests associated with respirator face mask fit tests, personnel performing TRM visual inspections are also required to have annual eye examinations that ensure visual acuity requirements consistent with ASME IWA 2321 Vision Tests. The training and qualification of PVNGS personnel to visual acceptance criteria consistent with the VT-3 examinations provides an acceptable level of quality and safety.

Examination Intervals

OM Part 4, Paragraph 2.3.2.2 provides a schedule for visual examinations that is more restrictive than the TRM TSR 3.7.101.1, Augmented Inservice Inspection Program.

The TRM program was prepared in accordance with the guidance in Generic Letter 90-09, *Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions*. The stated purpose of the generic letter was to provide alternative guidance to snubber inspection schedules which were excessively restrictive. The alternate schedule was provided to alleviate the expenditure of unnecessary resources and prevent radiological exposure associated with the overly restrictive examination schedule. Holding to ASME/ANSI OMa-1988, Part 4 effectively cancels the benefits intended through the generic letter.

Relief Request No. 5
Inservice Inspection Requirements for Snubbers

Basis For
Relief (cont'd)

Failure Mode Groups

OM Part 4, Paragraph 2.3.4.3 and 3.2.4.2 require that unacceptable snubbers be categorized into failure mode groups. Groups: (a) design/manufacture, (b) application induced, (c) maintenance/repair/installation, (d) isolated, (e) unexplained. The PVNGS TRM program does not require the breakout of this type of classification.

The PVNGS TRM requires that the cause for failures be clearly established and remedied for that failed snubber and those that may be generically susceptible. While failure mode groups are not specified in the PVNGS TRM, any unacceptable snubbers that would be categorized as common cause would be classified as such and evaluated. Snubbers susceptible to the same failure mechanism would be examined and or tested as required. The differences in the two programs create confusion when applying corrective actions and examination schedules for failed snubbers and therefore is impractical. Examining and testing snubbers only in accordance with PVNGS TSR 3.7.101.1 would help eliminate any misinterpretation or confusion in administering overlapping requirements for snubbers, and remove the possibility of applying contradicting requirements to the same snubber(s).

Authorized Nuclear Inservice Inspector (ANII) Involvement

IWA-2110 requires ANII involvement for snubber examination and testing. Likewise, IWA-4160 requires the services of an authorized inspection agency during the repair and replacement process. The PVNGS TRM snubber program does not require the use of an ANII for examination and test requirements of inservice or preservice snubbers.

A snubber program manager (Snubber Engineer) provides oversight of the TRM snubber program implementation for both visual examination and functional testing. This oversight includes both review and evaluation of visual examination and functional testing data to ensure TRM requirements are met. The snubber program manager provides an acceptable level of quality and safety without ANII involvement in those activities.

ANII involvement will be maintained in other inservice repair and replacement activities, as required by IWA-2110 (g) and (h) and implemented by PVNGS's ASME Section XI repair and replacement program.

Relief Request No. 5
Inservice Inspection Requirements for Snubbers

Basis For
Relief (cont'd)

Documentation

Subarticle IWA-6230 and OM Part 4, Sections 2.4 and 3.3 provide requirements for a summary report of examination, tests, repair, and replacements of snubbers among other items. Under the alternate requirements for snubbers in TRM TSR 3.7.101.1, there will be no ASME Section XI inservice examination and testing of snubbers to document in a summary report.

Visual examination in accordance with TRM TSR 3.7.101.1 is required for reinstallation of a replacement snubber. Functional testing in accordance with TSR 3.7.101.1 is required for replaced or rebuilt snubbers. The procedures that implement TRM TSR 3.7.101.1 are written and approved in accordance with the PVNGS Quality Assurance Program. They include data sheets for capturing snubber reinstallation/replacement component information, documenting the visual examination and functional test data and results, as well as documenting nonconforming results and evaluation of those results. The completed data sheets are QA records and are controlled and maintained in accordance with the PVNGS QA records program. These records are available onsite for review and inspection.

The current snubber requirements in the TRM had been promulgated and approved by the NRC as part of the Palo Verde Technical Specifications. The existing snubber inspection and testing requirements of TRM TSR 3.7.101.1 were relocated from the Palo Verde Technical Specifications to the TRM as part of NRC approved Amendment 117, dated May 20, 1998. The PVNGS TRM is a licensee-controlled document referenced in PVNGS UFSAR, Section 13.7, with changes in the TRM controlled in accordance with the provisions of 10 CFR 50.59.

The NRC approved a similar relief request for snubbers for PVNGS's first 10-year inspection interval (reference TAC Nos. 56661, 62797, and 64909, dated October 21, 1987).

Summary

Based on the justification provided, PVNGS's examination and testing of snubbers in accordance with PVNGS TRM TSR 3.7.101.1, Augmented Inservice Inspection Program, will provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a (a)(3)(i), APS requests that relief be granted from ASME Code, 1992 Edition, Section XI, Article IWF-5000 with regard to visual examination and functional testing of Code Class 1, 2, and 3 snubbers for preservice, inservice, and repair/replacement activities. This relief request pertains to the Second 10-Year Interval Inservice Inspection Program for PVNGS Units 1, 2, and 3.

Relief Request No. 5
Inservice Inspection Requirements for Snubbers

Precedent

1. Relief was granted to PVNGS for implementing the alternate sampling plan in the Technical Specifications per letter, dated October 21, 1987 from E. A. Licitra, NRC to E. E. Van Brunt, Jr., APS regarding approval of Inservice Inspection Relief Request 1 (TAC NOs 56661, 62797 and 64909).

The operating license for Palo Verde was amended per letter, dated March 2, 1992 from C. M. Thompson, NRC to W. F. Conway, APS to allow snubber visual inspections and corrective actions consistent with Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated December 11, 1990. (TAC NO. M80567, TAC NO. M80568 and TAC NO. M80569)

Sample plan notification was submitted per letter, dated July 22, 1993 from W. F. Conway, APS to B. H. Faulkenberry, NRC, stating the 10% sample plan for snubber functional testing would be implemented (APS letter 102-02582).

2. Relief was granted to the Perry Nuclear Station to implement an alternate to IWF 5000 in regards to visual examination and functional testing per the technical requirements of the Perry Operational Requirements Manual, per letter, dated February 15, 2001 from A. J. Mendiola, NRC to J. K. Wood, FENOC regarding approval of Relief Request IR-023, Revision 2 (TAC NO. MA8689).
3. Relief was granted to the Catawba Nuclear Station to use the snubber inspection programs specified in their Technical Specification 3/4.7.8 in lieu of the requirements of ASME Code, Section XI, per letter, dated January 11, 1996, from H. N. Berkow, NRC to W. R. McCollum, Duke regarding snubber inspection frequency Relief Request 95-05 (TAC NO. M93355).

References

1. ASME Section XI, Rules for Inspection and Testing of Components of Light Water Cooled Plants 1992 Edition and Addenda, Section IWA-5000.
2. ASME/ANSI OM – 1997, Operation and Maintenance of Nuclear Power Plants, Part 4.
3. ASME/ANSI OMa – 1988, Addenda to ASME/ANSI OM – 1997, Operation and Maintenance of Nuclear Power Plants, Part 4.

Attachment 1

PVNGS Technical Requirements Manual (TRM)

Revision 16

TLCO 3.7.101

Snubbers

and

TSR 3.7.101.1

Augmented Inservice Inspection
Program

T3.7.101 Snubbers

TLCO 3.7.101 All hydraulic and mechanical snubbers shall be OPERABLE. The only snubbers excluded from this requirement are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

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

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more snubbers inoperable.	A.1 Replace or restore the inoperable snubbers to OPERABLE status and perform an engineering evaluation per TSR 3.7.101.g on the attached component.	72 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Declare the attached system inoperable and follow the appropriate ACTION statement for that system.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
TSR 3.7.101.1 Each snubber shall be demonstrated OPERABLE by performance of the attached augmented inservice inspection program and the requirements of ASME Section XI.	In accordance with the attached augmented inservice inspection program and ASME Section XI.

AUGMENTED INSERVICE INSPECTION PROGRAM

a. Snubber 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 3.7.101-1. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 3.7.101-1 and the first inspection interval determined using this criteria shall be based upon the previous inspection as interval established by the requirements in effect before Amendment No. 44.

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: (1) there are no visible indications of damage or impaired OPERABILITY and (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, provided that: (1) 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 (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per TSR 3.7.101.1.f. When a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be declared inoperable and cannot be determined OPERABLE via functional testing unless the test is started with the piston in the as-found setting, extending the piston rod in the tension mode direction.

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Augmented Inservice Inspection Program (continued)

d. Transient Event Inspection

An inspection shall be performed of all hydraulic and mechanical snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data. A visual inspection of the systems shall be made within 6 months following such an event. 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.

e. Functional Tests

During the first refueling shutdown and at least once per 18 months (Except that the functional testing due not later than September 25, 1991 may be deferred until the next refueling outage, but not beyond December 17, 1991) thereafter during shutdown, a representative sample of snubbers shall be tested using one of the following sample plans. The sample plan shall be selected prior to the test period and cannot be changed during the test period. The NRC Regional Administrator shall be notified in writing of the sample plan selected prior to the test period or the sample plan used in the prior test period shall be implemented:

- 1) At least 10% of the total of each type of snubber 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 TSR 3.7.101.1.f., 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 3.7.101-1. "C" is the total number of snubbers of a type found not meeting the acceptance requirements of TSR 3.7.101.1.f. 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 3.7.101-1. If at any time the point plotted falls in the "Reject" region all snubbers of that type shall be functionally tested. If at any time the point plotted falls in the "Accept" region,
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(continued)

Augmented Inservice Inspection Program (continued)

testing of snubbers of that type may 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. Testing equipment failure during functional testing may invalidate that day's testing and allow that day's testing to resume anew at a later time, providing all snubbers tested with the failed equipment during the day of equipment failure are retested; or

- 3) An initial representative sample of 55 snubbers shall be functionally tested. For each snubber type which does not meet the functional test acceptance criteria, another sample of at least one-half the size of the initial sample shall be tested until the total number tested is equal to the initial sample size multiplied by the factor, $1 + C/2$, where "C" is the number of snubbers found which do not meet the functional test acceptance criteria. The results from this sample plan shall be plotted using an "Accept" line which follows the equation $N = 55(1 + C/2)$. Each snubber point should be plotted as soon as the snubber is tested. If the point plotted falls on or below the "Accept" line, testing of that type of snubber may be terminated. If the point plotted falls above the "Accept" line, testing must continue until the point falls in the "Accept" region or all the snubbers of that type have been tested.

The representative sample selected for the functional test sample plans shall be randomly selected from the snubbers of each type and reviewed before beginning the testing. The review shall ensure as far as practical that they are representative of the various configurations, operating environments, range of size, and capacity of snubbers of each type. Snubbers placed in the same locations as snubbers which failed the previous functional test shall be retested at the time of the next functional test but shall not be included in the sample plan. If during the functional testing, additional sampling is required due to failure of only one type of snubber, the functional testing results shall be reviewed at the time to determine if additional samples should be limited to the type of snubber which has failed the functional testing.

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Augmented Inservice Inspection Program (continued)

f. 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) For mechanical snubbers, the force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel; and
- 4) For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement.

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.

g. 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 to which the inoperable snubbers are attached 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 lock up 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 TSR 3.7.101.1.e for snubbers not meeting the functional test acceptance criteria.

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Augmented Inservice Inspection Program (continued)

h. 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.

i. Snubber Seal Replacement Program

The service life of hydraulic and mechanical snubbers shall be monitored to ensure that the service life is not exceeded between surveillance inspections. The maximum expected service life for various seals, springs, and other critical parts shall be determined and established based on engineering information and shall be extended or shortened based on monitored test results and failure history. Critical parts shall be replaced so that the maximum service life will not be exceeded during a period when the snubber is required to be OPERABLE. The parts replacements shall be documented and the documentation shall be retained for the duration of the Unit Operating License.

Table 3.7.101-1 (Page 1 of 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

-----NOTES-----

1. The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and 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

(continued)

Table 3.7.101-1 (Page 2 of 2)
Snubber Visual Inspection Interval

(continued)

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.

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, and C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.
 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.
 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.
 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 number in Columns B and C.
 6. The provisions of TSR 3.0.100.2 are applicable for all inspection intervals up to and including 48 months.
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