July 31, 1992

Docket No. 50-341

Mr. William S. Orser
Senior Vice President - Nuclear
Operations
Detroit Edison Company
6400 North Dixie Highway
Newport, Michigan 48166

Dear Mr. Orser:

SUBJECT: FERMI-2 - AMENDMENT NO. 84 TO FACILITY OPERATING LICENSE NO. NPF-43 (TAC NO. M82717)

The Commission has issued the enclosed Amendment No. 84 to Facility Operating License No. NPF-43 for the Fermi-2 facility. This amendment consists of changes to the Plant Technical Specifications in response to your letter dated January 28, 1992.

The amendment revises Technical Specification (TS) 3/4.7.5 to provide an alternate snubber visual inspection interval in accordance with guidance contained in Generic Letter 90-09, "Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Actions."

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

Sincerely,

/s/

Timothy G. Colburn, Sr. Project Manager
Project Directorate III-1
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 84 to NPF-43
2. Safety Evaluation

cc w/enclosures:
See next page

OFFICE	LA:PDIII-1	PM:PDIII-1	EMEB	D:PDIII-1
NAME	MShuttleworth	TColburn	JNorberg	LMarsh
DATE	7/24/92	7/14/92	7/21/92	7/30/92

OFFICIAL RECORD COPY
FILENAME: B:\82717.AMD

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

July 31, 1992

Docket No. 50-341

Mr. William S. Orser
Senior Vice President - Nuclear
Operations
Detroit Edison Company
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FOR

Timothy G. Colburn, Sr. Project Manager
Project Directorate III-1
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 84 to NPF-43
2. Safety Evaluation

cc w/enclosures:
See next page

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Detroit Edison Company
Fermi Unit 2
6400 North Dixie Highway
Newport, Michigan 48166

DATED: July 31, 1992

AMENDMENT NO. 84 TO FACILITY OPERATING LICENSE NO. NPF-43-FERMI-2

Docket File
NRC & Local PDRs
PDIII-1 Reading
Fermi Plant File
B. Boger
J. Zwolinski
L. Marsh
M. Shuttleworth
T. Colburn
OGC-WF
D. Hagan, 3302 MNBB
G. Hill (4), P-137
Wanda Jones, MNBB-7103
C. Grimes, 11/F/23
ACRS (10)
GPA/PA
OC/LFMB
W. Shafer, R-III

cc: Plant Service list

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

DETROIT EDISON COMPANY

FERMI-2

DOCKET NO. 50-341

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 84
License No. NPF-43

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by the Detroit Edison Company (the licensee) dated January 28, 1992, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-43 is hereby amended to read as follows:

   Technical Specifications and Environmental Protection Plan

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 84 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. DECo shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance with full implementation within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Ledyard B. Marsh, Director
Project Directorate III-1
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 31, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 84

FACILITY OPERATING LICENSE NO. NPF-43

DOCKET NO. 50-341

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain a vertical line indicating the area of change.

REMOVE	INSERT
xxiv	xxiv
3/4 7-15*	3/4 7-15*
3/4 7-16	3/4 7-16
3/4 7-17	3/4 7-17
3/4 7-18*	3/4 7-18*
----	3/4 7-20a
----	3/4 7-20b
B 3/4 7-2	B 3/4 7-2
B 3/4 7-3	B 3/4 7-3
B 3/4 7-4	B 3/4 7-4

*Overleaf page provided to maintain document completeness. No changes contained in these pages.

LIST OF TABLES (Continued)

SURVEILLANCE REQUIREMENTS (Continued)

c. At least once per 18 months by:

1. Performing a system functional test which included simulated automatic actuation and restart and verifying that each automatic valve in the flow path actuates to its correct position. Actual injection of coolant into the reactor vessel may be excluded.

2. Verifying that the system will develop a flow of greater than or equal to 600 gpm in the test flow path with a system head corresponding to reactor vessel operating pressure including injection line losses when steam is being supplied to the turbine at a pressure of 150 + 50, -0 psig.*

3. Verifying that the suction for the RCIC system is automatically transferred from the condensate storage tank to the suppression pool on a condensate storage tank water level-low signal.

*The provisions of Specification 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the tests.

3/4.7.5 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.5 All* hydraulic and mechanical snubbers shall be OPERABLE.

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

ACTION:

With one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.5g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.5 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program in addition to the requirements of Specification 4.0.5.

a. Inspection Types

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

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7.5-1. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in Table 4.7.5-1. 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 .

*As described in the bases.

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 functional, and (3) fasteners for 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: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.5f. For those snubbers common to more than one system, the OPERABILITY of such snubbers shall be considered in assessing the OPERABILITY of each of the related systems. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

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 and a visual inspection of the systems within 72 hours for accessible areas and 6 months for inaccessible areas 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.

SURVEILLANCE REQUIREMENTS (Continued)

e. Functional Tests

During the first refueling shutdown and at least once per 18 months 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 Specification 4.7.5f., an additional 5% 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 4.7.5-1. "C" is the total number of snubbers of a type found not meeting the acceptance requirements of Specification 4.7.5f. 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 4.7.5-1. 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, 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 points 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

TABLE 4.7.5-1

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

Note 1: The next visual inspection interval for a snubber population or category 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.

TABLE 4.7.5-1 NOTES (Continued)

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.

REACTOR CORE ISOLATION COOLING SYSTEM (Continued)

With the RCIC system inoperable, adequate core cooling is assured by the OPERABILITY of the HPCI system and justifies the specified 14-day out of service period.

The surveillance requirements provide adequate assurance that RCIC will be OPERABLE when required. Although all active components are testable and full flow can be demonstrated by recirculation during reactor operation, a complete functional test requires reactor shutdown. The pump discharge piping is maintained full to prevent water hammer damage and to start cooling at the earliest possible moment.

3/4.7.5 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program 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.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2-kip, 10-kip, and 100-kip capacity manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" for the purposes of this Technical Specification would be a different type, as would hydraulic snubbers from either manufacturer.

A list of individual snubbers with detailed information of snubber location and size and of system affected shall be available at the plant in accordance with Section 50.71(c) of 10 CFR Part 50. The accessibility of each snubber shall be determined and approved by the Onsite Review Organization. The determination shall be based upon the existing radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location, etc.), and the recommendations of Regulatory Guides 8.8 and 8.10. The addition or deletion of any hydraulic or mechanical snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to each safety-related system. Therefore, the required inspection interval varies based upon the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories and the previous inspection interval as specified in NRC Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions". In order to establish the inspection frequency for each type of snubber on safety-related

SNUBBERS (Continued)

systems it was assumed that the frequency of snubber failures and initiating events is constant with time and that the failure of any snubber on any system could cause the system to become unprotected and, therefore, result in failure during an assumed initiating event. Inspections performed before the interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

The acceptance criteria used in both the visual inspections and the functional testing determines the OPERABILITY of the snubber(s). When a snubber is determined to be inoperable, an Engineering Evaluation is required. This provides for an evaluation of the snubber mode of failure to determine if the snubber mode of failure has adversely affected the safety-related component or system to which it was attached. This evaluation will further verify that the system is still capable of meeting its design function.

To provide assurance of snubber functional reliability one of three functional testing methods is used with the stated acceptance criteria:

1. Functionally test 10% of a type of snubber with an additional 5% tested for each functional testing failure, or

2. Functionally test a sample size and determine sample acceptance or rejection using Figure 4.7.5-1, or

3. Functionally test a representative sample size and determine sample acceptance or rejection using the stated equation.

Figure 4.7.5-1 was developed using "Wald's Sequential Probability Ratio Plan" as described in "Quality Control and Industrial Statistics" by Acheson J. Duncan.

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 snubbers for the applicable design conditions at either the completion of their fabrication or at a subsequent date. Snubbers so exempted shall be listed in the list of individual snubbers indicating the extent of the exemptions.

The service life of a snubber is established via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life.

3/4.7.6 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values. Sealed sources are classified into three groups according to their use, with surveillance requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism, i.e., sealed sources within radiation monitoring devices, are considered to be stored and need not be tested unless they are removed from the shielded mechanism.

3.4.7.7 DELETED

3/4.7.8 DELETED

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 84 TO FACILITY OPERATING LICENSE NO. NPF-43

DETROIT EDISON COMPANY

FERMI-2

DOCKET NO. 50-341

1.0 INTRODUCTION

By letter dated January 28, 1992, the Detroit Edison Company, (DECo or the licensee) requested an amendment to Facility Operating License No. NPF-43 for the Fermi-2 plant. The proposed amendment would revise Technical Specification (TS) 4.7.5 to provide an alternative schedule for visual inspection of snubbers. The application was submitted in response to and in accordance with guidance contained in the staff's Generic Letter (GL) 90-09 "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions" dated December 11, 1990.

2.0 DISCUSSION

TS 4.7.5.b currently specifies a snubber visual inspection schedule that is based on the number of snubbers in a given system found inoperable during the previous visual inspection, irrespective of the size of the snubber population. The existing TS requirements establish inspection intervals in fractions of the nominal 18 month fuel cycle. These intervals are described in a table contained in TS 4.7.5.b. The purpose of the proposed TS change is to revise the snubber visual inspection interval to one that is based on the number of unacceptable snubbers found in proportion to the size of the population or category of snubbers included in the previous inspection. The next visual inspection interval may be twice (up to 48 months maximum), the same, or reduced to two-thirds of the previous inspection interval depending on the number of unacceptable snubbers found in the previous inspection. The requirements for determining the next inspection interval are contained in the proposed TS Table 4.7.5-1.

The licensee's proposed TS change differs slightly from the guidance contained in GL 90-09. If the GL 90-09 model TS were incorporated into Fermi-2 TS 4.7.5.b, "Visual Inspections," it would read as follows:

> "Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7.5-1. The visual inspection interval for each type of snubber shall

be determined based upon the criteria provided in Table 4.7.5-1 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before Amendment ."

The licensee's proposed TS 4.7.5.b reads as shown below. The underlined word, "category," indicates a deviation from the change presented in the GL 90-09 guidance.

"Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7.5-1. The visual inspection interval for each <u>category</u> of snubber shall be determined based upon the criteria provided in Table 4.7.5-1. 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 ."

The licensee has stated that the word "category" has been substituted for "type" to provide consistency with the wording used in the discussion of inaccessible and accessible snubber categories contained in the first two sentences of proposed TS 4.7.5.b and in the proposed TS Table 4.7.5-1. The model TS change for TS 4.7.5.b states that the snubber visual inspection interval for each "type" of snubber shall be determined by TS Table 4.7.5-1. "Type," as defined in Fermi-2 TS 4.7.5.a, refers to snubbers of the same design and manufacturer. Snubber "type" is to be used in snubber functional testing because snubber functional testing failures are more readily grouped by design and manufacturer. The licensee states that the type of snubber is not a factor in determining the snubber visual inspection interval as defined in the model snubber visual inspection interval table and the proposed TS Table 4.7.5-1. Snubber population or category is the determining factor. Therefore, when used in the context of snubber visual inspections, licensee believes that it is acceptable to substitute "category" for "type".

The licensee has reworded proposed TS 4.7.5.c to provide consistency with the existing nomenclature used in the rest of TS 3/4.7.5. If the exact wording of the changes for alternate snubber visual inspection intervals in the Reference 2 model TS was incorporated into Fermi-2 TS 4.7.5.c, "Visual Inspection Acceptance Criteria," it would read as follows:

"Visual inspections shall verify that: (1) there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are secure. Snubbers which appear inoperable as a result of visual inspection 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 on that system that may be generically

susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specifications 4.7.5f. For those snubbers common to more than one system, the OPERABILITY of such snubbers shall be considered in assessing the surveillance schedule for each of the related systems. A review and evaluation shall be preformed 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."

The proposed TS 4.7.5.c, "Visual Inspection Acceptance Criteria" reads as shown below. The underlined words and phrases indicate deviations from the guidance presented in GL 90-09 and nomenclature changes from the current Fermi-2 TS 4.7.5.c:

"Visual inspections shall verify that: (1) there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for 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: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specifications 4.7.5f. For those snubbers common to more than one system, the OPERABILITY of such snubbers shall be considered in assessing the OPERABILITY of each of the related systems. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met."

The licensee has substituted the word "functional" for "secure" because they believe "functional" better describes the condition of the foundation/ supporting structure attachments and component/snubber anchorage fasteners required for a successful visual inspection of a snubber. This is a nomenclature change from the existing Fermi-2 TS and is not part of the changes for alternative snubber visual inspection intervals in GL 90-09. It is consistent with the nomenclature used in the current Standard Technical Specifications format.

The phrase "OPERABILITY of" is substituted for the phrase "surveillance schedule" to better define that equipment operability is being assessed when snubbers common to more than one system are declared inoperable. This is a nomenclature change from the existing Fermi-2 TS and is not part of the changes for alternate snubber visual inspection intervals in GL 90-09. However, this change is needed because GL 90-09 changes do not specify a surveillance schedule for each system.

The phrase "irrespective of type on that system" in the second sentence of the current TS 4.7.5.c has been removed. This phrase is currently included in the requirement that the cause of rejection for a particular snubber be remedied, not only for the affected snubber, but for all other snubbers on the same system that may be generically susceptible. As stated above, the reference to "type" is being removed from the snubber visual inspection requirements to maintain consistent nomenclature in the snubber visual inspection requirements. The phrase is not needed because the wording requires that the cause of the rejection be remedied "for other snubbers that may be generically susceptible." If the cause of the rejection is generic, then the type of snubber has no bearing on determining which snubbers are affected. The reference to "system" is eliminated because the proposed snubber visual inspection intervals are based on snubber population or category.

The licensee proposed TS also differs from the GL 90-09 guidance that all snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable for purposes of determining the next inspection interval. This is because there are no cases of multiple hydraulic snubbers connected to a hydraulic fluid reservoir at Fermi-2. Therefore, this provision is unnecessary. The related bases have been changed to reflect the proposed changes. Additionally, a typographical error was corrected in TS Bases 3/4.7.5 to reflect the correct value of additional snubbers tested (5% vice 10%) for each functional test failure determined in TS 4.7.5.e.1.

3.0 EVALUATION

As stated in GL 90-09, the snubber TS imposes surveillance requirements for functional testing and visual inspection of all safety-related snubbers. Functional testing verifies that a snubber can operate within specific performance limits. Functional testing involves removing the snubber and testing it on a specially designed test stand. Functional testing provides a 95 percent confidence level that 90 to 100 percent of the snubbers operate within the specified acceptance limits. A visual inspection is the observation of the condition of installed snubbers to identify those that are damaged, degraded, or inoperable due to external physical damage, leakage, corrosion, or environmental exposure. The visual examination is a separate process that complements the functional testing program and provides additional confidence in snubber operability.

Plants having a large snubber population, such as Fermi-2, find that the current visual inspection schedule is excessively restrictive. As stated in GL 90-09, some plants have spent significant resources and have subjected plant personnel to unnecessary radiological exposure to comply with the visual examination requirements.

The NRC determined that an alternative inspection schedule based on the number of unacceptable snubbers found during the previous inspection, the total population or category size for each snubber type, and the previous inspection

interval is acceptable. A snubber is considered unacceptable if it fails to meet its visual inspection acceptance criteria. The license shall perform and document a review and evaluation to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the licensee shall declare the snubber inoperable and shall meet the applicable action requirements. To determine the next surveillance interval, the licensee may reclassify the unacceptable snubber as acceptable if: (1) the cause of the rejection is determined and corrected for the affected snubber and other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined operable. Snubbers may be categorized as accessible or inaccessible and may be examined separately or jointly. The licensee must make and document that decision before any inspection and use that decision as the basis upon which to determine the next inspection interval for that category

Use of this alternate inspection schedule will reduce personnel radiation exposure because it will be possible to reduce the number of inspections through extended inspection intervals and by allowing the added flexibility to schedule inspections during refueling outage time frames. Extended surveillance intervals will also be cost effective because reducing the number of inspections will reduce inspection man-hours and the associated material commitments.

Where the licensee's proposed TS differ slightly from the model TS included in GL 90-09, the staff has reviewed the licensee's justification and determined that the changes meet the intent of GL 90-09 and are, therefore, acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or a change to a surveillance requirement. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding (57 FR 22261). Accordingly, this amendment meets the eligibility criteria for categorical exclusion forth in 10 CFR 51.22 (c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement nor environmental assessment need be prepared in connection with the issuance of this amendment.

6.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

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