

April 24, 1986

*DMBolt*

Docket No. 50-346

DISTRIBUTION

Docket File

NRC PDR  
L PDR  
PBD-6  
FMiraglia  
OELD  
OPA  
LHarmon  
ACRS-10  
JPartlow

GE Edison  
WJones  
FOB, PWR-B  
LFMB  
RIngram  
Ade Agazio  
GDick  
Gray File+4  
EJordan  
TBarnhart-4  
BGrimes

*HShaw  
WJohnston*

Mr. Joe Williams, Jr.  
Vice President, Nuclear  
Toledo Edison Company  
Edison Plaza - Stop 712  
300 Madison Avenue  
Toledo, Ohio 43652

Dear Mr. Williams:

SUBJECT: AMENDMENT NO. 94 TO FACILITY OPERATING LICENSE NO. NPF-3;  
SNUBBER REQUIREMENTS

The Commission has issued the enclosed Amendment No. 94 to Facility Operating License No. NPF-3 for the Davis-Besse Nuclear Power Station, Unit No. 1. This amendment consists of changes to the Appendix A Technical Specifications in response to your application dated September 1, 1983 (No. 984), as revised January 30, 1985 (No. 1113).

This amendment revises testing requirements for hydraulic snubbers and adds requirements for mechanical snubber operability and testing. The amendment also deletes a listing of safety-related snubbers.

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

Sincerely,

**ORIGINAL SIGNED COPY**

Albert W. De Agazio, Project Manager  
PWR Project Directorate #6  
Division of PWR Licensing-B

Enclosures:

- 1. Amendment No. 94 to NPF-3
- 2. Safety Evaluation

cc w/enclosures:  
See next page

~~EB: PWR-B  
WJohnston  
3/1/86~~

PBD-6  
RIngram  
3/17/86

PBD-6 *ade*  
Ade Agazio:cf  
3/19/86

~~PBD-6~~  
GDick  
3/19/86

PBD-6 *CF*  
CMcCracken  
3/19/86

PBD-6  
JStutz  
3/19/86

OELD  
*CBaird*  
3/18/86  
*[Signature]*

Mr. J. Williams  
Toledo Edison Company

Davis-Besse Nuclear Power Station  
Unit No. 1

cc:

Donald H. Hauser, Esq.  
The Cleveland Electric  
Illuminating Company  
P. O. Box 5000  
Cleveland, Ohio 44101

Ohio Department of Health  
ATTN: Radiological Health  
Program Director  
P. O. Box 118  
Columbus, Ohio 43216

Mr. Robert F. Peters  
Manager, Nuclear Licensing  
Toledo Edison Company  
Edison Plaza  
300 Madison Avenue  
Toledo, Ohio 43652

Attorney General  
Department of Attorney  
General  
30 East Broad Street  
Columbus, Ohio 43215

Gerald Charnoff, Esq.  
Shaw, Pittman, Potts  
and Trowbridge  
1800 M Street, N.W.  
Washington, D.C. 20036

Mr. James W. Harris, Director  
(Addressee Only)  
Division of Power Generation  
Ohio Department of Industrial Relations  
2323 West 5th Avenue  
P. O. Box 825  
Columbus, Ohio 43216

Mr. Paul M. Smart, President  
The Toledo Edison Company  
300 Madison Avenue  
Toledo, Ohio 43652

Mr. Harold Kohn, Staff Scientist  
Power Siting Commission  
361 East Broad Street  
Columbus, Ohio 43216

Mr. Robert B. Borsum  
Babcock & Wilcox  
Nuclear Power Generation  
Division  
Suite 200, 7910 Woodmont Avenue  
Bethesda, Maryland 20814

President, Board of  
County Commissioners of  
Ottawa County  
Port Clinton, Ohio 43452

Resident Inspector  
U.S. Nuclear Regulatory Commission  
5503 N. State Route 2  
Oak Harbor, Ohio 43449

Regional Administrator, Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137



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

TOLEDO EDISON COMPANY

AND

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

DOCKET NO. 50-346

DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 94  
License No. NPF-3

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Toledo Edison Company and The Cleveland Electric Illuminating Company (the licensees) dated September 1, 1983, as revised January 30, 1985, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-3 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 94, are hereby incorporated in the license. The Toledo Edison Company shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

  
John F. Stolz, Director  
PWR Project Directorate #6  
Division of PWR Licensing-B

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: April 24, 1986

ATTACHMENT TO LICENSE AMENDMENT NO. 94

FACILITY OPERATING LICENSE NO. NPF-3

DOCKET NO. 50-346

Replace the following pages of the Appendix "A" Technical Specifications with the attached 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.

<u>Remove</u>	<u>Insert</u>
3/4 7-20	3/4 7-20
3/4 7-21	3/4 7-21
3/4 7-22	3/4 7-22
3/4 7-23	3/4 7-23
3/4 7-24	3/4 7-24
3/4 7-25 thru 3/4 7-36	3/4 7-36
B 3/4 7-5	B 3/4 7-5
--	B 3/4 7-5a
6-19a	6-19a

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

3. Verify that the make up flow of the system is 300 cfm  $\pm$  10% when supplying the control room with outside air.
  
- f. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove  $\geq$  99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 3300 cfm  $\pm$  10%.
  
- g. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove  $>$  99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 3300 cfm  $\pm$  10%.

PLANT SYSTEMS

3/4.7.7 SNUBBERS

LIMITING CONDITION FOR OPERATION

---

3.7.7 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:

- a. With one or more snubbers inoperable: 1. within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status, or 2. verify system operability with the snubber(s) inoperable by engineering evaluation within 72 hours; or 3. declare the supported subsystem inoperable and follow the appropriate ACTION statement for that system.

and, for snubbers which have failed either the visual or functional test:

- b. Perform an engineering evaluation within 90 days to determine if any safety-related system or component has been adversely affected by the inoperability of the snubber and if the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.<sup>1</sup> The provisions of Technical Specification 3.0.4 are not applicable for the component or system.

SURVEILLANCE REQUIREMENTS

---

4.7.7 Each snubber<sup>2</sup> shall be demonstrated OPERABLE by the requirements of the following surveillance programs and pursuant to requirements of Specification 4.0.5.

4.7.7.1 Visual Inspection Program

---

<sup>1</sup>Engineering evaluation is not required when a snubber is removed for surveillance testing provided it is returned to OPERABLE status within the requirements of action statement a.

<sup>2</sup>Safety related snubbers are listed in the latest revision of applicable surveillance test procedure(s). Snubbers may be added to, or removed from, safety-related systems and their assigned groups without prior Licensing Amendment.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

a. General Requirements

At least once per inspection interval, each group of snubbers in use in the Plant shall be visually inspected in accordance with Specification 4.7.7.1.b and 4.7.7.1.c. Visual inspections may be performed with binoculars, or other visual support devices, for those snubbers that are difficult to access and where required to keep exposure as low as reasonably achievable. Response to failures shall be in accordance with Specification 4.7.7.1.d.

b. Inspection Interval and Sample Criteria

The inspection interval and sample criteria may be applied on the basis of snubber groups. The snubber groups may be established based on physical characteristics and accessibility. Inaccessible snubbers are defined as those located: (a) inside containment, (b) in high radiation exposure zones, or (c) in areas where accessibility is limited by physical constraints such as the need for scaffolding. Visual inspections for a group shall be performed in accordance with the following schedule:

Snubbers are divided into four (4) groups: "Accessible" - Group I and "Inaccessible" - Group II for either hydraulic or mechanical.

<u>No. of Inoperable Snubbers Within a Group - Per Inspection Interval</u>	<u>Subsequent Group Visual Inspection Interval <sup>3, 4, 5</sup></u>
0	18 months
1	12 months
2	6 months
3, 4	124 days
5, 6, 7	62 days
8 or more	31 days

The inspections for a group shall include 100 percent of snubbers in that group.

<sup>3</sup>The inspection interval shall not be lengthened more than one step at a time, and

<sup>4</sup>The provisions of Specification 4.0.2 are not applicable.

<sup>5</sup>All the time intervals are  $\pm 25\%$ , except that the inspection of inaccessible snubbers may be deferred to the next shutdown when plant conditions allow 5 days for inspection.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

c. Acceptance Criteria

A snubber shall be considered OPERABLE as a result of a visual inspection if: (1) there are no visible indications of damage or inoperability, and (2) attachments to the foundation or supporting structure are secure.

d. Response to Failures

For each snubber unit which does not meet the visual inspection acceptance criteria of Specification 4.7.7.1.c:

Determine the snubber OPERABLE by functionally testing the snubber per Specification 4.7.7.2, unless the (hydraulic) snubber was determined inoperable because the fluid port was found uncovered;

OR

1. Perform the ACTION specified in 3.7.7a; and
  2. Perform an engineering evaluation as specified in 3.7.7.b.;
- and
3. Increase the frequency of group inspection as described in Specification 4.7.7.1.b, unless the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible.

4.7.7.2 Functional Test Program

a. General Requirements

At least once per inspection interval a representative sample of each group of snubber in use in the Plant shall be functionally tested in accordance with Specifications 4.7.7.2.b and 4.7.7.2.c. Response to the failures shall be in accordance with Specification 4.7.7.2.d.

For all snubbers, functional testing shall consist of either bench testing or inplace testing.

b. Inspection Interval and Sample Criteria

The snubbers may be categorized into groups based on physical characteristics. Snubbers are divided into four (4) groups: "Accessible" - Group I and "Inaccessible" - Group II for either hydraulic or mechanical. Each group may be tested independently from the standpoint of performing additional tests if failures are discovered.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

The inspection interval for functional testing shall be 18 months.

Snubbers which are scheduled for removal for seal maintenance may be included in the test sample prior to any maintenance on the snubber.

The representative sample shall consist of at least 10 percent (rounded off to next highest integer) of each group of snubbers in use in the Plant. The selection process shall ensure that all snubbers, regardless<sup>6</sup> of their accessibility classification, are functionally tested at least once every ten inspection intervals.

c. Acceptance Criteria

For hydraulic snubbers (either inplace testing or bench testing), the test shall verify that:

1. Snubber piston will allow the hydraulic fluid to "bypass" from one side of the piston to the other to assure unrestrained action is achieved within the specified range of velocity or acceleration in both tension and compression.
2. When the snubber is subjected to a movement which creates a load condition that exceeds the specified range of velocity or acceleration, the hydraulic fluid is trapped in one end of the snubber causing suppression of that movement.
3. Snubber release rate or bleed rate, where required, occurs in compression and tension.

For mechanical snubber in place and bench testing, the 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.

---

<sup>6</sup>Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a justifiable basis for exemption is presented.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

---

d. Response to Failures

For each inoperable snubber per Specification 4.7.7.2.c:

1. Perform the ACTIONS specified in 3.7.7a and 3.7.7b; and
2. Within the specified inspection interval, functionally test an additional sample of at least 10 percent of the snubber units from the group that the inoperable snubber unit is in.

The functional testing of an additional sample of at least 10 percent from the inoperable snubber's group is required for each snubber unit determined to be inoperable in subsequent functional tests, or until all snubbers in that group have been tested; and

3. The cause of snubber failure will be evaluated and, if caused by a manufacturing or design deficiency, all snubbers of the same or similar design subject to the same defect shall be functionally tested within 90 days from determining snubber inoperability. This testing requirement shall be independent of the requirements in 4.7.7.2.d(2) above.

PLANT SYSTEMS

3/4.7.8 SEALED SOURCE CONTAMINATION

LIMITING CONDITION FOR OPERATION

3.7.8.1 Each sealed source containing radioactive material either in excess of 100 microcuries of beta and/or gamma emitting material or 5 microcuries of alpha emitting material shall be free of  $\geq 0.005$  microcuries of removable contamination.

APPLICABILITY: At all times.

ACTION:

- a. Each sealed source with removable contamination in excess of the above limit shall be immediately withdrawn from use and:
  1. Either decontaminated and repaired, or
  2. Disposed of in accordance with Commission Regulations.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.8.1.1 Test Requirements - Each sealed source shall be tested for leakage and/or contamination by:

- a. The licensee, or
- b. Other persons specifically authorized by the Commission or an Agreement State.

The test method shall have a detection sensitivity of at least 0.005 microcuries per test sample.

4.7.8.1.2 Test Frequencies - Each category of sealed sources shall be tested at the frequency described below.

- a. Sources in use (excluding startup sources and fission detectors previously subjected to core flux) - At least once per six months for all sealed sources containing radioactive material:

## PLANT SYSTEMS

### BASES

---

## PLANT SYSTEMS

### 3/4.7.7. SNUBBERS

#### BASES

All safety-related 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 event. Snubbers excluded from this inspection program are those installed on safety-related systems for loads other than seismic or 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 during a seismic event.

Inoperable is defined as:

1. For visual test
  - a. The fluid no longer is supplied to the valve block, or
  - b. Mounting pins are disengaged from the snubber.
  - c. Attachment to foundation or supporting structure is not secure.
2. For functional test
  - a. The snubber (excluding end anchors, i.e., pin-to-pin) does not meet specified test criteria.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original 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.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

## PLANT SYSTEMS

### BASES

---

When a snubber is found inoperable through a visual or functional test, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested at 18-month intervals. Observed failures of these sample snubbers shall require functional testing of additional units. When a snubber is found to be inoperable due to failure to lock up or failure to move (i.e., frozen in place), the cause will be evaluated for further action or testing.

In cases where the cause of failure has been identified, additional snubbers that have a high probability for the same type of failure or are being used in the same application that caused the failure shall be tested. This requirement increases the probability of locating inoperable snubbers without testing 100% of the snubbers.

Hydraulic snubbers and mechanical snubbers may each be treated as a different entity for the above surveillance programs.

## PLANT SYSTEMS

### BASES

#### 3/4.7.8 SEALED SOURCE CONTAINMENT

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 by product, source, and special nuclear material sources will not exceed allowable intake values.

#### 3/4.7.9 FIRE SUPPRESSION SYSTEMS

The OPERABILITY of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety related equipment is located. The fire suppression system consists of the water system, spray and/or sprinklers, and fire hose stations. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety related equipment and is a major element in the facility fire protection program.

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service.

In the event the fire suppression water system becomes inoperable, immediate corrective measures must be taken since this system provides the major fire suppression capability of the plant. The requirement for a twenty-four hour report to the Commission provides for prompt evaluation of the acceptability of the corrective measures to provide adequate fire suppression capability for the continued protection of the nuclear plant.

#### 3/4.7.10 PENETRATION FIRE BARRIERS

The functional integrity of the penetration fire barriers ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. This design feature minimizes the possibility of a single fire rapidly involving several areas of the facility prior to detection and extinguishment. The penetration fire barriers are a passive element in the facility fire protection program and are subject to periodic inspections:

During periods of time when the barriers are not functional, a continuous fire watch is required to be maintained in the vicinity of the affected barrier until the barrier is restored to functional status.

## ADMINISTRATIVE CONTROLS

- e. Records of changes made to Operating Procedures.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient of operational cycles for those facility components identified in Table 5.7-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the SRB and the CNRB.
- l. Records for Environmental Qualification which are covered under the provisions of paragraph 6.13.

ADMINISTRATIVE CONTROLS

RECORD RETENTION (continued)

- m. Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analyses at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.
- o. Records of the service lives of all safety related hydraulic and mechanical snubbers including the date at which the service life commences and associated installation and maintenance records.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORTING AMENDMENT NO. 94 TO FACILITY OPERATING LICENSE NO. NPF-3

TOLEDO EDISON COMPANY

AND

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1

DOCKET NO. 50-346

INTRODUCTION

By letter dated September 1, 1983, as revised January 30, 1985, Toledo Edison Company (TED or the licensee) requested amendment to the Technical Specifications (TSs) appended to Facility Operating License No. NPF-3 for the Davis-Besse Nuclear Power Station, Unit No. 1. The proposed amendment would change those sections of the Davis-Besse Unit 1 TSs that specify the inservice surveillance requirements for hydraulic snubbers and would add requirements for mechanical snubber operability and testing. The proposed amendment would also delete the listing of safety-related snubbers in accordance with guidance provided in NRC Generic Letter 84-13.

EVALUATION

The licensee's proposed snubber surveillance and operability requirements are, in general, in accordance with the requirements specified in the Standard Technical Specifications (STSSs). However, the NRC staff recommended two additional changes to the licensee's proposed requirements during its review.

The proposed TSs should include a transient event inspection requirement as follows:

Transient Event Inspection

An inspection shall be performed of all 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 six 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.

8605200426 860424  
PDR ADOCK 05000346  
P PDR

Inspections conducted as described above have proven to be especially effective for identifying damaged snubbers. Therefore, this recommendation should be included in the TSs.

The proposed TSs do not identify an acceptance criterion regarding functional testing for snubber activation similar to paragraphs 4.7.9.d.1 and 4.7.9.e.1 of the STSs.

By letters dated January 22, 1986, and March 26, 1986, the licensee agreed to submit a separate amendment application which would propose to add the transient event inspection requirement and the acceptance criterion for functional testing. The licensee requested that NRC action continue on the TS changes requested by the application of September 1, 1983, as revised January 30, 1985. We find the licensee's commitment to be acceptable and conclude that the proposed changes will upgrade the requirements for hydraulic snubbers and add requirements for mechanical snubbers.

The licensee's proposal to remove the listing of safety-related snubbers from the TSs is in accordance with the guidance provided in Generic Letter 84-13 dated May 3, 1984, "Technical Specifications for Snubbers." This generic letter concludes that the tabular listing of snubbers currently included in the TSs may be deleted by any licensee submitting a license amendment. It states that the NRC staff has reassessed the inclusion of snubber listings in the TSs and concluded that such listings are not necessary provided the snubber TS is modified to specify which categories of snubbers are required to be operable. Recordkeeping requirements remain unchanged. Since any changes in snubber quantities, types, or locations would be a change to the facility, such changes would be subject to the provisions of 10 CFR Part 50.59 and would have to be reflected in the required records. The proposed change is administrative in nature and in itself does not affect plant design or operation, involve modifications to plant equipment, or make changes which would affect plant safety analyses. Any changes in snubber quantities, types, or locations would be a change to the facility and therefore would be subject to the provisions of 10 CFR 50.59. The revised TS specifies which snubbers are required to be operable. Recordkeeping requirements have been upgraded to bring them into conformance with Generic Letter 84-13. Therefore, we conclude that the proposed TS change is acceptable.

#### ENVIRONMENTAL CONSIDERATION

This amendment involves changes in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes in surveillance requirements. We have determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

CONCLUSION

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

Dated: April 24, 1986

Principal Contributor: Horace Shaw