



BRUCE H HAMILTON
Vice President
Oconee Nuclear Station

Duke Energy Corporation
ON01VP / 7800 Rochester Highway
Seneca, SC 29672

864 885 3487
864 885 4208 fax
bhhamilton@duke-energy.com

December 7, 2006

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Duke Power Company LLC
d/b/a Duke Energy Carolinas, LLC
Oconee Nuclear Station
Docket 50-269, -270, -287
Selected Licensee Commitments Manual (SLC)

Gentlemen:

Pursuant to 10CFR 50.4 and 50.71, please find attached 7 copies of the latest revisions to the Oconee Selected Licensee Commitments Manual (SLC). SLC Change 2006-04 will revise SLC 16.9.18, Snubbers, to add a note that states the following: "NRC approval of Relief Request (RR) No.03-006 makes Surveillance Requirements (SR) 16.9.18.1, SR 16.9.18.3, Table 16.9.18-1 and Table 16.9.18-2 regulatory requirements that may be used in lieu of ASME Code, Section XI, requirements for performing ISI and functional testing of snubbers. Any future changes to these requirements shall be reviewed and approved by the NRC staff pursuant to 10 CFR 50.55a(a)(3) or as an exemption pursuant to 10 CFR 50.12."

Very truly yours,

B. H. Hamilton
Vice President
Oconee Nuclear Station

RGJ/rgj
Attachment

xc: W. D. Travers
Regional Administrator, Region II

L. N. Olshan, ONRR

Dan Rich,
Oconee Resident Inspector

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Bxc: ELL
ONS Document Management
MR Coordinator (Ron Harris)

Attachment #1

Proposed SLC revision

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6.9 AUXILIARY SYSTEMS

16.9.18 Snubbers

-----NOTE-----

NRC approval of Relief Request No. 03-006 makes Surveillance Requirements (SR) 16.9.18.1, SR 16.9.18.3, Table 16.9.18-1 and Table 16.9.18-2 regulatory requirements that may be used in lieu of ASME Code, Section XI, requirements for performing ISI and functional testing of snubbers. Any future changes to these requirements shall be reviewed and approved by the NRC staff pursuant to 10 CFR 50.55a(a)(3) or as an exemption pursuant to 10 CFR 50.12.

COMMITMENT Hydraulic and Mechanical snubbers shall be OPERABLE to support systems and equipment required to be OPERABLE.

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

ACTIONS

-----NOTE-----

Separate Condition Entry is allowed for each snubber.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more snubbers inoperable.	A.1 Enter the applicable ACTIONS for any system(s) or component(s) made inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 16.9.18.1	Perform visual inspections of each snubber in accordance with Table 16.9.18-1.	<p>-----NOTE----- The provisions of SLC 16.2.7 do not apply. -----</p> <p>In accordance with Table 16.9.18-1</p>
SR 16.9.18.2	<p>-----NOTE----- The maximum expected service life for the various seals, seal materials, and applications shall be estimated based on engineering information, and the seals shall be replaced so that the maximum expected service life is not exceeded by more than 10% during a period when the snubber is required to be OPERABLE. The seal replacements shall be documented and the documentation shall be retained in accordance with Quality Assurance Requirements. -----</p> <p>Verify that the seal service life of hydraulic snubbers is not exceeded by more than 10% between surveillance inspections.</p>	N/A
SR 16.9.18.3	Perform a functional test on a representative sample of hydraulic snubbers and a representative sample of mechanical snubbers in accordance with Table 16.9.18-2.	<p>-----NOTE----- The provisions of SLC 16.2.7 do not apply. -----</p> <p>In accordance with Table 16.9.18-2</p>

Table 16.9.18-1 (page 1 of 3)
Snubber Visual Inspections

Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories is further divided into hydraulic or mechanical snubbers. Each of these categories (inaccessible hydraulic, inaccessible mechanical, accessible hydraulic, and accessible mechanical) may be inspected independently according to the schedule determined by criteria in this Table. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in this Table. The first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect in revision 3/27/99 to SLC 16.9.18.

Visual Inspection Acceptance Criteria

Visual inspections shall verify:

- (1) that there are no visible indications of damage or impaired OPERABILITY,
- (2) attachments to the foundation or supporting structure are secure,
- (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional, and
- (4) In the event of a severe dynamic event, mechanical snubbers in that system which experienced the event shall be inspected during the refueling outage to assure that the snubbers have freedom of movement and are not seized. The inspection shall consist of verifying freedom of motion using one of the following: (i) Manually induced snubber movement, (ii) evaluation of in place snubber piston setting; (iii) stroking the mechanical snubber through its full range of travel. If one or more mechanical snubbers are found seized during this inspection, those snubbers shall be replaced (or overhauled) before exceeding MODE 5. Re-inspection shall subsequently be performed according to the schedule criteria listed below.

Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing 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. However, when the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be tested by starting with the piston at the as found setting and extending the piston rod in the tension mode direction. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

Table 16.9.18-1 (page 2 of 3)
Snubber Visual Inspections

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 size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must make and document that decision before any inspection and shall use that decision as the basis for determining the next inspection interval for that category.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.

Table 16.9.18-1 (page 3 of 3)
Snubber Visual Inspections

- 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: $\pm 25\%$ is applicable for all inspection intervals up to and including 48 months.

Table 16.9.18-2 (page 1 of 2)
Snubber Functional Testing

At least once every 18 months +25%, a representative sample, a minimum of 10% of the total of hydraulic and a minimum of 10% of the total mechanical snubbers in use in the plant, shall be functionally tested either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria, an additional minimum of 10% of the snubbers shall be functionally tested until none are found inoperative or all have been functionally tested.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of hydraulic and mechanical snubbers. The representative sample shall be selected randomly from the total population of safety-related hydraulic and mechanical snubbers.

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included for the re-sampling, and failures shall not require additional testing of other snubbers.

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
2. Snubber bleed, or release rate, where required, is within the specified range in compression or tension. For hydraulic snubbers specifically required not to displace under continuous load, the ability of the hydraulic snubber to withstand load without displacement shall be verified.

The mechanical snubber functional test shall verify that:

1. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force.
2. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression. (Measuring the time required to travel a known distance, under load, is an acceptable method.)

Table 16.9.18-2 (page 2 of 2)
Snubber Functional Testing

3. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., is seized, an engineering evaluation will be performed to determine if the mode of failure could affect other snubbers of the same design. If confirmed, then reporting applicability under 10CFR Part 21 requirements will be assessed.

When a snubber is found inoperable, an engineering and/or operability evaluation will be performed in accordance with appropriate Station procedures.

BASES

BACKGROUND

Snubbers are designed to prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, while allowing normal thermal motion during startup or shutdown. The consequence of an inoperable snubber is an increase in the probability of structural damage to piping as a result of a seismic or other event initiating dynamic loads. It is therefore required that all snubbers required to protect the primary coolant system or any other safety system or component be operable during all MODES of required system/component OPERABILITY.

The requirement(s) of this SLC section were relocated from CTS 3.14 and 4.18 during the conversion to ITS.

In addition, the NRC granted Relief Request 03-006 to allow snubber testing in accordance with this SLC as an alternative to snubber testing requirements of the ASME Code, Section XI imposed by 10CFR 50.55a(g)(4). This relief request expires at the end of the Fourth Ten Year Inservice Inspection Interval (Ref. 3).

The end dates for the Fourth Ten Year Inservice Inspection (ISI) Interval vary by Unit. The dates are contained in each Units ISI Plan Manuals (Ref. 4).

APPLICABILITY

All snubbers are required OPERABLE in MODES 1 through 4 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 on safety-related systems required to be OPERABLE in MODES 5 and 6 are maintained OPERABLE to ensure the required systems are maintained OPERABLE. 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.

ACTION A.1

In the event one or more snubbers are inoperable, OPERABILITY of the affected system(s) and component(s) must be determined and/or the applicable ACTION(s) entered. If there is reasonable assurance of OPERABILITY of the affected system(s) or component(s) with an inoperable snubber(s), then it is not necessary to enter the respective ACTION(s). A snubber removed from service, for any reason, cannot be considered OPERABLE since it is no longer connected to the supported system or component.

SURVEILLANCE REQUIREMENTS

The visual inspection intervals have been revised to incorporate provisions of Generic Letter 90-09. 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

BASES (continued)

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 unless so determined, by the engineer, from a previous window of a schedule. 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 inservice 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.

When a snubber is found INOPERABLE, an operability 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.

To provide assurance of snubber functional reliability, a representative sample of the installed hydraulic snubbers will be functionally tested every 18 months. Observed failures of these sample snubbers shall require functional testing of additional units.

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

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Nuclear Regulatory Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubber for the applicable design conditions. Snubbers so exempted shall be listed in a permanent record which references the exemption letter date.

REFERENCES

1. Letter, NRC to H. B. Barron, Licensing Position Regarding Snubbers, July 9, 1999.
2. NRC Generic Letter 90-09.
3. Letter, NRC to R. A. Jones, Oconee Nuclear Station, Units 1, 2, and 3 – Relief Request No. 03-006 for Snubber Visual Examination and Functional Testing Related to the Fourth Ten-year Interval Inservice Inspection Program, September 13, 2005.
4. ISI Plan Manuals

Attachment #2

Markup of current SLC

6.9 AUXILIARY SYSTEMS

16.9.18 Snubbers

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BASES (continued)

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