

ATTACHMENT A

APPLICATION FOR AMENDMENT TO  
OPERATING LICENSE

Consolidated Edison Company of New York, Inc.  
Power Authority of the State of New York

Indian Point Unit No. 3  
Docket No. 50-286  
Facility Operating License No. DPR-64

November , 1976

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### 3.13 SHOCK SUPPRESSORS (SNUBBERS)

#### Applicability

Applies to the operability of snubbers required for protection of safety-related components.

#### Objective

To define the time during which reactor operation is permitted after detection of inoperable snubbers.

#### Specification

1. During all modes of operation except cold shutdown all snubbers listed in Table 3.13-1 shall be operable except as noted in 3.13.2 through 3.13.4.
2. From and after the time that any snubber is determined to be inoperable, continued reactor operation or hot shutdown is permissible only during the succeeding 72 hours unless the snubber is made operable sooner or replaced.
3. If the requirements of 3.13.2 cannot be met, the reactor shall be in a cold shutdown condition within an additional 36 hours.
4. If a snubber is determined to be inoperable while the reactor is in the cold shutdown mode, the snubber shall be made operable or replaced prior to bringing the reactor above cold shutdown.
5. Snubbers may be added or deleted to safety related systems without prior License Amendment to Table 3.13-1. A revision to Table 3.13-1 will be included with the next License Amendment request.

Basis

Snubbers are required to prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, while allowing normal thermal motion during startup and shutdown. The consequence of an inoperable snubber is an increase in the probability of structural damage to piping in the event of 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 reactor operation. Because the snubber protection is required only during low-probability events, a period of 72 hours is allowed for repairs or replacements. In case a shutdown is required, the allowance of 36 hours to reach a cold shut-down condition will permit an orderly shutdown consistent with standard operating procedures. Specification 3.13.4 prohibits startup if snubbers are known to be inoperable.

## SAFETY RELATED SHOCK SUPPRESSORS (SNUBBERS)

| LINE NO.      | SNUBBER NO.    | LOCATION (1) | CATEGORY (2) |
|---------------|----------------|--------------|--------------|
| 1             | MS-R-1-2-H     | AFB 63'      | 3            |
| 1             | MS-R-1-3-H     | AFB 63'      | 3            |
| 1             | MS-R-200-H     | VC 101'      | 3            |
| 2             | MS-R-2-1-H     | AFB 75'      | 3            |
| 2             | MS-R-2-2-H     | AFB 75'      | 3            |
| 2             | MS-R-2-3-H     | AFB 75'      | 3            |
| 3             | MS-R-100-H     | VC 101'      | 3            |
| 3             | MS-R-3-1-H     | AFB 75'      | 3            |
| 3             | MS-R-3-2-H     | AFB 75'      | 3            |
| 3             | SR-M53         | AFB 75'      | 3            |
| 4             | MS-R-4-1-H     | AFB 63'      | 3            |
| 4             | MS-R-4-2-H     | AFB 63'      | 3            |
| 4             | SR-M55         | AFB 63'      | 3            |
| 5             | BFD-R-5-1-H    | AFB 40'      | 3            |
| 6             | BFD-R-6-1-H    | AFB 41'      | 3            |
| 6             | BF - R - 300-H | AFB 59'      | 3            |
| 7             | BFD-R-7-1-H    | AFB 41'      | 3            |
| 8             | BFD-R-8-1-H    | AFB 39'      | 3            |
| 9             | AC-R-215-H     | PAB 17'      | 4            |
| 9             | AC-R-221-H     | PAB 26'      | 4            |
| 9             | AC-R-216-H     | PAB 17'      | 4            |
| 9             | AC-R-9-2-H     | PAB 30'      | 4            |
| 9             | AC-R-9-11-H    | PAB 51'      | 4            |
| 9             | AC-R-227-H     | PAB 53'      | 4            |
| 9             | AC-R-222-H     | PAB 44'      | 4            |
| 10            | AC-R-40-H      | VC 59'       | 3            |
| 10            | AC-R-41-H      | VC 59'       | 3            |
| 10            | AC-R-10-7-H    | VC 59'       | 3            |
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## SAFETY RELATED SHOCK SUPPRESSORS (SNUBBERS)

| LINE NO. | SNUBBER NO.                        | LOCATION | CATEGORY |
|----------|------------------------------------|----------|----------|
| 10       | AC-R-10-12-H                       | PAB 52'  | 4        |
| 10       | AC-R-10-13-H                       | PAB 52'  | 4        |
| 10       | AC-R-10-18A-H                      | PAB 26'  | 4        |
| 10       | AC-R-10-18B-H                      | PAB 26'  | 4        |
| 12A      | SW-R-12a-7-H                       | VC 91'   | 3        |
| 12C      | M/S - 12d - 39<br>SW - R - 12c - H | VC 92'   | 3        |
| 12C      | SW - R - 12C - 13 - H              | VC 92'   | 3        |
| 12E      | SW - R - 12E - 3A - H              | VC 87'   | 3        |
| 16       | SI - R - 16 - 9 - H                | PAB 61   | 4        |
| 16       | SI - R - 16 - 28 - H               | VC 60'   | 3        |
| 16A      | SI - R - 16A - 11 - H              | VC 59'   | 3        |
| 17       | CH - R - 781 - H                   | VC 58'   | 3        |
| 17B      | CH - R - 17B - 16A - H             | VC 83'   | 3        |
| 17B      | CH - R - 17B - 23 - H              | VC 49'   | 3        |
| 17C      | CH - R - 17C - 5A - H              | VC 80'   | 3        |
| 17C      | CH - R - 17C - 14 - H              | VC 48'   | 3        |
| 31       | SI - R - 537 - H                   | PAB 42'  | 4        |
| 38A      | RC - R - 38A - 3 - H               | VC 60'   | 3        |
| 38B      | RC - R - 38B - 1 - H               | VC 58'   | 3        |
| 45       | BD - R - 45 - 8 - H                | VC 66'   | 3        |
| 45       | BD - R - 45 - 16B - H              | PAB 61'  | 4        |
| 46       | BD - R - 46 - 4 - H                | VC 68'   | 3        |
| 47       | BD - R - 47 - 28 - H               | PAB 62'  | 4        |
| 48       | BD - R - 48 - 18 - H               | PAB 62'  | 4        |
| 52A      | AC - R - 52A - 2 - H               | VC 49'   | 3        |
| 53A      | AC - R - 53A - 11 - H              | VC 50'   | 3        |

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## SAFETY RELATED SHOCK SUPPRESSORS (SNUBBERS)

| LINE NO. | SNUBBER NO.           | LOCATION | CATEGORY |
|----------|-----------------------|----------|----------|
| 56       | SI - R - 56 - 5 - H   | PAB 44'  | 4        |
| 60       | SI - H - 60 - 1 - V   | VC 55'   | 3        |
| 60       | SI - R - 60 - 2 - H   | VC 55'   | 3        |
| 60       | SI - R - 404 - H      | PAB 55'  | 4        |
| 61       | RC - R - 61 - 5 - H   | VC 67'   | 3        |
| 61       | RC - R - 61 - 11 - H  | VC 78'   | 3        |
| 62       | RC - R - 25 - H       | VC 70'   | 3        |
| 70       | RC - R - 70 - 6A - H  | VC 103'  | 3        |
| 70       | RC - R - 70 - 6B - H  | VC 103'  | 3        |
| 70       | RC - R - 70 - 8 - H   | VC 102'  | 3        |
| 70       | RC - R - 70 - 9 - H   | VC 101'  | 3        |
| 70       | RC - R - 70 - 11 - H  | VC 76'   | 3        |
| 70       | RC - R - 70 - 12A - H | VC 65'   | 3        |
| 70       | RC - R - 70 - 12B - H | VC 65'   | 3        |
| 77       | CH - R - 77 - 15 - H  | VC 46'   | 3        |
| 79       | CH - R - 13 - H       | VC 56'   | 3        |
| 79       | CH - R - 18 - H       | VC 56'   | 3        |
| 79       | CH - R - 19 - H       | VC 56'   | 3        |
| 80       | CH - R - 80 - 4 - H   | VC 58'   | 3        |
| 81       | WD - R - 81 - 2 - H   | VC 51'   | 3        |
| 82       | RC - R - 82 - 2 - H   | VC 51'   | 3        |
| 82       | RC - R - 82 - 3 - H   | VC 52'   | 3        |
| 84       | RC - R - 84 - 2 - H   | VC 51'   | 3        |
| 84       | RC - R - 84 - 3 - H   | VC 51'   | 3        |
| 93       | SI - R - 93 - 1A - H  | VC 85'   | 3        |

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## SAFETY RELATED SHOCK SUPPRESSORS (SNUBBERS)

| LINE NO. | SNUBBER NO.           | LOCATION | CATEGORY |
|----------|-----------------------|----------|----------|
| 93       | SI - R - 93 - LB - H  | VC 85'   | 3        |
| 94       | SI - R - 94 - 1A - H  | VC 85'   | 3        |
| 94       | SI - R - 94 - 1B - H  | VC 86'   | 3        |
| 103      | PW - R - 227 - H      | PAB 49'  | 4        |
| 104      | CH - R - 730 - H      | PAB 45'  | 4        |
| 106      | WD - R - 641 - H      | PAB 41'  | 4        |
| 107      | WD - R - 107 - 16 - H | PAB 42'  | 4        |
| 116      | CH - R - 656 - H      | PAB 44'  | 4        |
| 117      | CH - R - 801 - H      | PAB 44'  | 4        |
| 121      | CH - R - 121-14-H     | PAB 45'  | 4        |
| 130      | WD - R - 673 - H      | PAB 44'  | 4        |
| 132      | WD - R - 132 - 4 - H  | PAB 74'  | 4        |
| 155      | AC - R - 155 - 2 - H  | PAB 33'  | 4        |
| 161      | SI - R - 161-17A-H    | PAB 40'  | 4        |
| 190      | AC - R - 190 - 1 - H  | PAB 33'  | 4        |
| 202      | CH - R - 202 - 3 - H  | PAB 75'  | 4        |
| 208      | CH - R - 208 - 10 - H | PAB 75'  | 4        |
| 224      | PW - R - 404 - H      | PAB 68'  | 4        |
| 235      | CH - R - 235 - 9B - H | PAB 80'  | 4        |
| 270      | SI - R - 270 - 27 - H | PAB 61'  | 4        |
| 342      | RC - R - 342 - 5A - H | VC 126'  | 3        |
| 342      | RC - R - 342 - 5B - H | VC 126'  | 3        |
| 342      | RC - R - 342 - 6 - H  | VC 103'  | 3        |
| 343      | RC - R - 343-4A-H     | VC 123'  | 3        |
| 343      | RC - R - 343 - 4B - H | VC 123'  | 3        |
| 343      | RC - R - 343 - 5 - H  | VC 103'  | 3        |

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## SAFETY RELATED SHOCK SUPPRESSORS (SNUBBERS)

| LINE NO. | SNUBBER NO.                    | LOCATION | CATEGORY |
|----------|--------------------------------|----------|----------|
| 344      | RC - R - 344 - 4A - H          | VC 123   | 3        |
| 344      | RC - R - 344 - 4B - H          | VC 123   | 3        |
| 344      | RC - R - 344 - 5 - H           | VC 103'  | 3        |
| 351      | PWR - 127                      | VC 64'   | 3        |
| 352      | PWR - 152                      | VC 65'   | 3        |
| 353      | PWR - 147B                     | VC 62'   | 3        |
| 353      | PWR - 148                      | VC 49'   | 3        |
| 353      | SI-R-353 - 4 - H               | VC 59'   | 3        |
| 354      | PW - R - 484 - H               | PAB 49'  | 4        |
| 356      | SI - R - 356 - 2 - H           | VC 53'   | 3        |
| 356      | SI - R - 356 - 3 - H           | VC 55'   | 3        |
| 356      | SI - R - 356 - 4 - H           | VC 61'   | 3        |
| 356      | SI - R - 356 - 5 - H           | VC 61'   | 3        |
| 358      | SI - R - 44 - H                | VC 57'   | 3        |
| 361      | SI - R - 361 - 1B - H          | VC 53'   | 3        |
| 361      | SI - R - 361 - 4 - H           | VC 53'   | 3        |
| 361      | SI - R - 361 - 8 - H           | VC 65'   | 3        |
| 361      | SI - R - 361 - 9 - H           | VC 65'   | 3        |
| 418      | WD - R - 693 - H               | PAB 43'  | 4        |
| 475      | SI - R - 475 - 7 - H           | VC 78'   | 3        |
| 475      | SI - R - 475 - 11 - H          | VC 79'   | 3        |
| 475      | SI - R - 475 - 14 - H          | VC 79'   | 3        |
| 479      | PW - R - 479 - 3 - H           | PAB 79'  | 4        |
| 480      | M/S - 493<br>CH - R - 480A - H | PAB 52'  | 4        |
| 552      | RC - R - 552 - 3 - H           | VC 61'   | 3        |
| 592      | CH - R - 592 - 8 - H           | PAB 35'  | 4        |
| 595      | CH - R - 695 - H               | PAB 50'  | 4        |

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## SAFETY RELATED SHOCK SUPPRESSORS (SNUBBERS)

| LINE NO. | SNUBBER NO.            | LOCATION | CATEGORY |
|----------|------------------------|----------|----------|
| 611      | SI - R - 611 - 4 - H   | VC 81'   | 3        |
| 611      | SI - R - 611 -10 - H   | VC 79'   | 3        |
| 654      | AC - R - 212 - H       | PAB 17'  | 4        |
| 654      | AC - R - 213 - H       | PAB 17'  | 4        |
| 654      | AC - R - 214 - H       | PAB 18'  | 4        |
| 753      | RC - R - 753 - 17 - H  | VC 60'   | 3        |
| 776      | RC - R - 506 - H       | VC 64'   | 3        |
| 776      | RC - R - 510 - H       | VC 63'   | 3        |
| 778      | RC - R - 778 - 2 - H   | VC 64'   | 3        |
| 778      | RC - R - 778 - 4 H     | VC 63'   | 3        |
| 789      | RC - R - 501 - H       | VC 64'   | 3        |
| 789      | RC - R - 505 - H       | VC 63'   | 3        |
| 791      | RC - R - 791 - 2 - H   | VC 64'   | 3        |
| 791      | RC - R - 791 - 4 - H   | VC 63'   | 3        |
| 1026     | MS - R - 1026 - 2 - H  | AFB 66'  | 3        |
| 1027     | MS - R - 1027 - 7 - H  | AFB 56'  | 3        |
| 1027     | MS - R - 1027 - 4 - H  | AFB 68'  | 3        |
| 1133     | MS - R - 1133 - 2A - H | AFB 56'  | 3        |
| 1134     | M/S - 1133 2A          | AFB 56'  | 3        |
|          | M/S - R-1134 - H       |          | 3        |
| 1143     | IA - R - 1143 - 3 - H  | CR 25'   | 4        |

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## SAFETY RELATED SHOCK SUPPRESSORS (SNUBBERS)

| LINE NO.       | SNUBBER NO. | LOCATION | CATEGORY |
|----------------|-------------|----------|----------|
| STM. GEN. # 31 | S1          | VC 48'   | 3, 2     |
|                | S2          | VC 48'   | 3, 2     |
|                | S6          | VC 90'   | 3, 2     |
|                | S6          | VC 92'   | 3, 2     |
|                | S8          | VC 90'   | 3, 2     |
|                | S8          | VC 92'   | 3, 2     |
| STM. GEN. # 32 | S1          | VC 48'   | 3, 2     |
|                | S3          | VC 48'   | 3, 2     |
|                | S4          | VC 90'   | 3, 2     |
|                | S4          | VC 92'   | 3, 2     |
|                | S8          | VC 90'   | 3, 2     |
|                | S8          | VC 92'   | 3, 2     |
| STM. GEN. # 33 | S1          | VC 48'   | 3, 2     |
|                | S3          | VC 48'   | 3, 2     |
|                | S5          | VC 90'   | 3, 2     |
|                | S5          | VC 92'   | 3, 2     |
|                | S8          | VC 90'   | 3, 2     |
|                | S8          | VC 92'   | 3, 2     |
| STM. GEN. # 34 | S1          | VC 48'   | 3, 2     |
|                | S2          | VC 48'   | 3, 2     |
|                | S7          | VC 90'   | 3, 2     |
|                | S7          | VC 92'   | 3, 2     |
|                | S8          | VC 90'   | 3, 2     |
|                | S8          | VC 92'   | 3, 2     |

Amendment No.

SAFETY RELATED SHOCK SUPPRESSORS (SNUBBERS)

NOTES:

- (1) Location: AFB - Auxiliary Boiler Feed Pump  
Building and Pipe Bridge Area
- PAB - Primary Auxiliary Building  
VC - Containment Building
- (2) Categories: 1. Snubber in high radiation area during shutdown.\*
2. Snubber especially difficult to remove - (Because of size and location).
3. Snubber inaccessible during normal operation.\*  
(Because of high radiation and / or temperature environment).
4. Snubber accessible during normal operation. \*

\* Modifications to this table due to changes in high radiation areas should be submitted to the NRC as part of the next license amendment.

4.11 SHOCK SUPPRESSORS (SNUBBERS)

Applicability

Applies to the inspection and testing of all hydraulic snubbers listed in Table 3.13-1.

Objective

To verify that snubbers will perform their design functions in the event of a seismic or other transient dynamic event.

Specification

1. All hydraulic snubbers whose seal material has been demonstrated by operating experience, laboratory testing, or analysis to be compatible with the operating environment shall be visually inspected. This inspection shall include, but not necessarily be limited to, inspection of the hydraulic fluid reservoir, fluid connections, and linkage connections to the piping and anchor to verify snubber operability in accordance with the following schedule:

| Number of Snubbers Found Inoperable During Inspection or During Inspection Interval | Next Required Inspection Interval |
|---|-----------------------------------|
| 0   | 18 months $\pm$ 25%               |
| 1   | 12 months $\pm$ 25%               |
| 2   | 6 months $\pm$ 25%                |
| 3,4   | 124 days $\pm$ 25%                |
| 5,6,7   | 62 days $\pm$ 25%                 |
| $\geq$ 8  | 31 days $\pm$ 25%                 |

The required inspection interval shall not be lengthened more than one step at a time.

Snubbers are categorized in Table 3.13-1 as accessible or inaccessible during reactor operation. These two groups may be

inspected independently according to the above schedule.

2. All hydraulic snubbers whose seal materials have not been demonstrated to be compatible with the operating environment shall be visually inspected for operability every 31 days  $\pm$  25%.
3. The initial inspection shall be performed within 6 months from the date of issuance of these specifications. For the purpose of entering the schedule in Specification 4.11.1, it shall be assumed that the facility had been on a 6-month inspection interval.
4. Once each refueling cycle, a representative sample of 10 hydraulic snubbers or approximately 10% of the snubbers, whichever is less, shall be functionally tested for operability including verification of proper piston movement, lock up and bleed.\* For each unit and subsequent unit found inoperable, an additional 10% or ten hydraulic snubbers shall be so tested until no more failures are found or all units have been tested. Snubbers of rated capacity greater than 50,000 lb need not be functionally tested.

\* Bleed capability must be tested only where particular snubber application requires this feature.

#### Basis

All safety related hydraulic snubbers are visually inspected for overall integrity and operability. The inspection will include inspection of the hydraulic fluid reservoir, fluid connections, and linkage connections to piping and structures. The inspection frequency is based upon maintaining a constant level of snubber protection. Thus the required inspection interval varies inversely with the observed snubber failures. The number of inoperable snubbers found during a required inspection determines the time interval for

the next required 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. Experience at operating facilities has shown that the required surveillance program should assure an acceptable level of snubber performance.

Snubbers containing seal material which has not been demonstrated by operating experience, lab testing or analysis to be compatible with the operating environment should be inspected more frequently (every month) until material compatibility is confirmed or an appropriate changeout is completed.

To further increase the assurance of snubber reliability functional tests will include stroking of the snubbers to verify proper piston movement, lock-up and bleed.\* Ten percent or ten snubbers, whichever is less, represents an adequate sample for such tests. Observed failures on these samples should require testing of additional units. Those snubbers designated in Table 3.13-1 as being in high radiation areas or especially difficult to remove need not be selected for functional tests. Snubbers of rated capacity greater than 50,000 lb are exempt from the functional testing requirements because of the impracticability of testing such large units.

\*Bleed capability must be tested only where particular snubber application requires this feature.

ATTACHMENT B

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Power Authority of the State of New York

Indian Point Unit No. 3  
Docket No. 50-286  
Facility Operating License No. DPR-64

November , 1976

## SAFETY EVALUATION

The purpose of the proposed changes to the Technical Specifications is to provide assurance that snubbers used on safety-related components are operable during reactor operation. These changes conform to the model Technical Specifications referenced in the Commission's letter dated October 5, 1976, requesting the changes.

The proposed changes have been reviewed by the Station Nuclear Safety Committee and Consolidated Edison Nuclear Facilities Safety Committee, and both committees concur that these changes do not represent a significant hazards consideration and will not cause any change in the types or increase in the amounts of effluents or any change in the authorized power level.