

ATTACHMENT A  
PROPOSED TECHNICAL SPECIFICATION CHANGES

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.  
INDIAN POINT UNIT NO. 2  
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LIST OF TABLES

<u>Title</u>	<u>Table No.</u>
Frequency Notation	1-1
Reactor Coolant (RC) Pumps/Residual Heat Removal (RHR) Pump(s) Operability/Operating Requirements for Decay Heat Removal and Core Mixing	3.1.A-1
OPS Operability Requirements	3.1.A-2
Maximum Allowable Power Range Neutron Flux High Setpoint with Inoperable Steam Line Safety Valves During 4-Loop Operation	3.4-1
Engineered Safety Features Initiation Instrument Setting Limits	3.5-1
Reactor Trip Instrumentation Limiting Operating Conditions	3.5-2
Instrumentation Operating Conditions for Engineered Safety Features	3.5-3
Instrumentation Operating Conditions for Isolation Functions	3.5-4
Accident Monitoring Instrumentation	3.5-5
Non-Automatic Containment Isolation Valves Open Continuously or Intermittently for Plant Operation	3.6-1
Radioactive Liquid Effluent Monitoring Instrumentation	3.9-1
Radioactive Gaseous Effluent Monitoring Instrumentation	3.9-2
Fire Detection Instruments	3.13-1
Fire Hose Stations and Fire Hydrants	3.13-2
Meteorological Monitoring Instrumentation	3.15-1
Minimum Frequencies for Checks, Calibrations and Tests of Instrument Channels	4.1-1
Frequencies for Sampling Tests	4.1-2

### 3.12 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.

#### Specifications

1. All snubbers which are located on systems required for the current mode of operation shall be operable.\* The only snubbers excluded from this requirement are those installed on non-safety-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.
2. During power operation, the requirements of Specification 3.12.1 may be modified to allow one or more snubbers to be inoperable subject to the following conditions:
  - a. The inoperable snubber must be restored to service within 72 hours or the reactor shall be placed in the cold shutdown condition within the succeeding 36 hours.
  - b. Either of the following must be performed:

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\* Snubber(s) taken out of service for maintenance and testing shall be considered inoperable unless returned to service within 72 hours.

#### 4.12 SHOCK SUPPRESSORS (SNUBBERS)

##### Applicability

Applies to the inspection and testing of all hydraulic snubbers addressed in Section 3.12 of the Technical Specifications.

##### Objective

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

##### Specifications

###### A. VISUAL INSPECTION

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 to verify operability in accordance with the following schedule:

<u>No. Inoperable Snubbers per Inspection Period</u>	<u>Next Required Visual Inspection Period *</u>
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 $\pm 25\%$

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\* The provision of Section 1.10 of the Technical Specifications is not applicable.

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

Snubbers are categorized as accessible or inaccessible during reactor operation. These two groups may be inspected independently according to the above schedule except as noted below.

If snubber inoperability is identified due to excessive fluid leakage from the external tubing associated with the twenty-four snubbers installed at the steam generators, this group of snubbers may be inspected independently according to the above schedule.

Visual inspection shall verify that (1) there is no visual indication of damage or impaired operability, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, the snubber has freedom of movement and is not frozen. Snubbers which appear inoperable as a result of visual inspection may be determined operable 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 4.12.C, as applicable. However, when a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be declared inoperable, and cannot be determined operable via functional testing for the purpose of establishing the next visual inspection period unless the test is started with the piston in the as-found setting, 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.

B. FUNCTIONAL TESTING

1. Once each refueling outage, with the provisions of Technical Specification 1.10 applicable, a representative sample of 10% of all the safety-related hydraulic snubbers shall be functionally tested for

operability, including verification of proper piston movement, lock-up rate and bleed. For each hydraulic snubber found inoperable, an additional 10% of the total installed of that type of hydraulic snubber shall be functionally tested. This additional testing will continue until no failures are found or until all snubbers of the same type have been functionally tested.

At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

1. the first snubber away from each reactor vessel nozzle,
2. snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.), and
3. snubbers within 10 feet of the discharge from a safety relief valve.

Snubbers identified as "Especially Difficult to Remove" or in "High-Radiation Zones During Shutdown" shall also be included in the representative samples.\*

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 currently installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included for the re-sampling.

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\* 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 and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions.

2. For the snubber(s) found inoperable, an engineering evaluation shall be performed on the components which are supported by the snubber(s). The purpose of this engineering evaluation shall be to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubber(s) in order to ensure that the supported component remains capable of meeting its designed service.
3. If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated, and if found to be caused by a manufacturer or design deficiency, all snubbers of the same manufacturer and model which are susceptible to the same defect and located in a similar environment shall be functionally tested. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test acceptance criteria.

C. FUNCTIONAL TEST ACCEPTANCE CRITERIA

The 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 snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

D. RECORD OF SNUBBER SERVICE LIFE

A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 6.10.2.n. Concurrently with the first visual inspection and at least once during every refueling outage, the installation and maintenance records for each snubber shall be reviewed to verify that the indicated

service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be re-evaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. This re-evaluation, replacement, or reconditioning shall be indicated in the records.

### Basis

The visual inspection frequency is based upon maintaining a constant level of snubber protection. 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 operable 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, and are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

To further increase the assurance of snubber reliability, functional tests will be performed once each refueling cycle. Ten percent of the installed hydraulic snubbers represents an adequate sample for such tests. Selection of a representative sample of hydraulic snubbers provides a confidence level within acceptable limits that these supports will be in an operable condition. Observed failures of these sample snubbers shall require functional testing of additional units of the same type.

- n. Records of the service lives of all snubbers addressed by Section 3.12 of the Technical Specifications, including the date at which the service life commences and associated installation and maintenance records.\*

#### 6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

#### 6.12 HIGH RADIATION AREA

6.12.1 As an acceptable alternative to the "control device" or "alarm signal" required by 10 CFR 20.203(c)(2):

- a. Each High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by issuance of a Radiation Work Permit and any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. Each High Radiation Area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of Specification 6.12.1(a) above, and in addition locked doors shall be provided to prevent unauthorized entry to such areas and the keys shall be maintained under the administrative control of the Watch Supervisor on duty.

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\* The documentation referred to herein is required for all snubbers beginning with those replaced following the issuance of Amendment 112.

ATTACHMENT B  
SAFETY ASSESSMENT  
AND  
BASIS FOR NO SIGNIFICANT HAZARDS DETERMINATION

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.  
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SAFETY ASSESSMENTDescription of Change

The changes that are proposed for the List of Tables and sections 3.12, 4.12 and 6.10.2.n are those required to remove Table 3.12-1 in which snubbers are listed and to delete all references to that table. This change is being proposed in accordance with Generic Letter 84-13, "Technical Specification for Snubbers", dated May 3, 1984. Removal of the snubber listing permits administrative control of changes to the list without the need to process a license amendment. Administrative controls for the relocation of the snubber listing to a plant procedure is in accordance with Generic Letter 91-08, "Removal of Component Lists from Technical Specifications".

Background

By letter dated November 20, 1980 to Power Reactor Licensees, the NRC requested all licensees to incorporate the applicable portion of attached model Technical Specifications concerning snubbers into the plant-specific Technical Specifications. In response to this request, Con Edison submitted an application dated May 30, 1984 for license amendment and proposed Technical Specification changes for operability and surveillance requirements for snubbers. In subsequent letters dated July 19, 1985 and December 19, 1985, Con Edison responded to requests for additional information dated November 26, 1984 and October 11, 1985, respectively. By letter dated May 19, 1986, the NRC issued Amendment No. 112 to the Indian Point 2 Technical Specifications. The Safety Evaluation enclosed with that letter determined that the Technical Specification submittal, as revised by the December 19, 1985 letter, was in substantial agreement with the model Technical Specification and recently approved Technical Specifications for operating licensees.

Generic Letter 84-13 was issued on May 3, 1984 and contained a revision to the surveillance requirements which were attached to the letter dated November 20, 1980. Specifically, the requirement that snubbers be listed in tables was eliminated. The initial May 30, 1984 Con Edison submittal and subsequent submittals did not contain the change allowed by Generic Letter 84-13. The current Technical Specifications for snubbers is unchanged from Amendment No. 112 and contains Table 3.12-1 in which the snubbers are listed.

On May 6, 1991, Generic Letter 91-08, "Removal of Component Lists from Technical Specifications", was issued to provide guidance on acceptable alternatives to identifying every component by its plant identification number as it is currently listed in the tables of Technical Specification components. This generic letter stated that the approach taken in Generic Letter 84-13 to remove the snubber list may also be used to remove other component lists, provided that a list of those components are included in a plant procedure that is subject to the change control provisions for plant procedures in the Administrative Controls Section of the Technical Specifications.

Basis for "No Significant Hazards Considerations" Determination

The Commission has provided guidance concerning the application of the standards for determining whether a "Significant Hazards Consideration" exists by providing examples in 51 FR 7751 (dated March 6, 1986). Example (i) of those involving no significant hazards considerations involves "a purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature."

The removal of the listing of snubbers from the Technical Specifications is of an administrative nature in that the NRC has determined that specifications may be stated in general terms that describe the types of components to which the requirements apply. This provides an acceptable alternative to identifying components by their plant identification number as they are currently listed in tables of Technical Specification components. The removal of the snubber list does not alter existing Technical Specification requirements or those snubbers to which it applies. The same snubbers presently required to be operable would continue to be required operable. Limitations, restrictions and surveillance requirements associated with the snubbers would remain unchanged. An appropriate description of the snubbers has been incorporated into the Technical Specifications, and, the snubber list will be relocated to a plant procedure that is subject to the change control provisions for plant procedures in the Administrative Controls Section 6.0 of the Technical Specifications. This procedure will be developed prior to approval of the amendment application. Therefore, since relocation of the snubber list does not alter the requirements of the Technical Specifications or those components to which it applies, and the list itself is subject to the plant procedure change control provisions of the Technical Specifications, this change is in accordance with Example (i) above.

In accordance with the requirements of 10 CFR 50.92, the proposed changes to the Technical Specifications are deemed not to involve any "Significant Hazards Considerations" because operation of Indian Point Unit No. 2 in accordance with these changes would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated;

The relocation of the listing of snubbers to a plant procedure is an administrative change. No technical requirements are affected in that the function, operation or surveillance requirements for any system or component are not being altered. Therefore, the conclusions of current accident analyses are not affected. Further, as required by Generic Letter 84-13, any changes in snubber quantities, types or locations will require the completion of a safety evaluation per the requirements of 10 CFR 50.59 to determine that the proposed change will not involve an unreviewed safety question. Therefore, future snubber changes will be evaluated against similar criteria.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated;

All changes described herein are administrative, introduce no new mode of plant operation, do not involve physical modification to any structure, system or component and do not affect the function, operation or surveillance requirements for any system or component. Therefore, the changes can not result in an unanalyzed accident. Further, as required by Generic Letter 84-13, any changes in snubber quantities, types or locations will require the completion of a safety evaluation per the requirements of 10 CFR 50.59 to determine that the proposed change will not involve an unreviewed safety question. Therefore, future snubber changes will be evaluated against similar criteria.

- 3) Involve a significant reduction in a margin of safety.

The administrative changes involved do not affect the requirement that all snubbers required to protect the primary coolant system or any other safety system or component be operable during reactor operation because no change to the current quantities, types or locations of snubbers is proposed. Further, these administrative changes do not impact the surveillance requirements that verify the existing snubbers will perform their design functions. Therefore, no margins of safety established by design or verified by testing to ensure operability of safety-related systems or components are affected. Further, as required by Generic Letter 84-13, any changes in snubber quantities, types or locations will require the completion of a safety evaluation per the requirements of 10 CFR 50.59 to determine that the proposed change will not involve an unreviewed safety question. Therefore, future snubber changes will be evaluated against similar criteria.

Based on the above discussion, since these proposed changes to the Indian Point Unit No. 2 Technical Specifications satisfy the criteria specified in 10 CFR 50.92, are similar to an example provided by the Commission of a change which involves "No Significant Hazards Considerations", and are not similar to any examples that involve a "Significant Hazards Consideration", Con Edison has determined that this amendment application does not involve any "Significant Hazards Considerations".

The proposed Technical Specification changes have been reviewed by the Station Nuclear Safety Committee and the Con Edison Nuclear Facilities Safety Committee. Both committees concur that these proposed changes do not represent any "Significant Hazards Considerations".