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SUBJECT: Application for proposed Amend 73 to License DPR-43, revising Tech Specs to reflect deletion of specific snubber testing & surveillance requirements per inservice insp plan. Safety evaluation encl. Fee paid.

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**WISCONSIN PUBLIC SERVICE CORPORATION**

600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

May 1, 1986

Dr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Proposed Amendment No. 73 to the KNPP Technical Specifications

Proposed Amendment No. 73 concerns the inspection and testing of snubbers at the Kewaunee Nuclear Power Plant (KNPP). Presently, the surveillance and testing requirements for "safety related" snubbers are detailed in the technical specifications. This proposed amendment deletes the specific snubber testing and surveillance requirements detailed in Section 4.14 of the KNPP technical specifications, revises the associated Limiting Conditions for Operation (LCO) specified in Section 3.14, and includes appropriate snubbers in KNPP's Inservice Inspection (ISI) Plan.

KNPP's first ten-year ISI plan was developed in accordance with the 1974 Edition of the ASME code including Addenda through summer 1975. At the time of the development of the snubber surveillance and testing requirements presently in the technical specifications, the 1974 Edition of the ASME Code did not require specific snubber inspection and testing. Therefore, negotiations between WPSC and the NRC led to the development of the requirements currently existing in the Technical Specifications.

KNPP's second ten-year ISI plan was developed in accordance with the 1980 Edition of the ASME code including Addenda through winter 1981 as required by 10 CFR 50.55a(g)(4). The 1980 Edition of the ASME code includes snubber inspection and testing guidance; therefore, we are required to inspect and test Code Class 1, 2, and 3 component snubbers in accordance with the ASME Code as a part of KNPP's Inservice Inspection Plan. Since snubber inspection requirements are now found in the ASME Code, the testing and surveillance requirements detailed in

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Section 4.14 of the KNPP Technical Specifications are redundant and only serve to create confusion. Therefore, it is appropriate to delete the snubber testing and surveillance requirements from the Technical Specifications and include the appropriate snubbers in the ten-year ISI Plan.

In order to be consistent with the addition of snubbers to the KNPP ISI Plan, Section 3.14, the LCO concerning snubber operability, has also been revised. Presently, Section 3.14 requires that all "safety related" snubbers must be operable before the reactor is made critical. With this revision, snubbers that will be subject to the LCO of Section 3.14 will be categorized as Code Class 1, 2, and 3 component snubbers, instead of "safety related," and will be required to be operable during plant modes that require the supported components to be operable.

The time allowed in Section 3.14b for snubber inoperability has also been revised for clarity. Presently, it is unclear as to how much time Section 3.14b allows for a snubber to be inoperable before a reactor shutdown is required. With this revision, a snubber will be allowed to be inoperable for either 72 hours or for the time period allowed by the supported component's LCO.

The last change made to Section 3.14 is to the shutdown conditions following the initiation of a reactor shutdown. Presently, Section 3.14b requires that the reactor must be in hot shutdown within 36 hours after the initiation of a reactor shutdown. This shutdown condition has been revised to be consistent with other shutdown conditions in KNPP's Technical Specifications. Specifically, if a reactor shutdown is required, action will be initiated within 1 hour to:

- Achieve hot standby within the next 6 hours.
- Achieve hot shutdown within the following 6 hours.
- Achieve cold shutdown within an additional 36 hours.

WPSC believes that is more appropriate to have consistent shutdown conditions in the Technical Specifications than to have shutdown conditions that differ by a few hours or go to hot shutdown as opposed to cold shutdown.

Attachment 1 to this letter provides a description of the proposed revisions, including safety evaluations and significant hazard determinations. The affected pages are TS 3.14-1, TS 3.14-2, TS 4.2-1, TS 4.2-8, TS 4.14-1, TS 4.14-2, TS 4.14-3 and TS 4.14-3a and are included in Attachment 2. Proposed Amendment No. 70, submitted October 23, 1986, affects page TS 4.2-8.

In accordance with the requirements of 10 CFR 50.30, you will find enclosed three (3) signed and notarized originals of this letter and forty (40) copies of the revisions to the pages affected by Proposed Amendment 73. A complete copy of this submittal has been transmitted to the State of Wisconsin as required by 10 CFR 50.91(b)(1). In accordance with the provisions of 10 CFR 170, a check for \$150 is enclosed.

Dr. H. R. Denton  
May 1, 1986  
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Sincerely,

*Carl W. Giesler*

Carl W. Giesler  
Vice President - Power Production

PIS/jms

Enc.

cc - Mr. G. E. Lear, US NRC  
Mr. Robert Nelson, US NRC  
Mr. R. S. Cullen, PSCW

Subscribed and Sworn to  
Before Me This 1st Day  
of May 1986

*Jeanne M. Stein*  
Notary Public, State of Wisconsin

My Commission Expires:  
June 28, 1987

Attachment 1  
To Letter from  
C. W. Giesler to H. R. Denton  
Dated May 1, 1986

Safety Evaluation  
and  
Significant Hazards Determination

Table of Contents, Page TS ii and TS iii

Description of Proposed Change

This change removes the title of Section 4.14, "Testing and Surveillance of Shock Suppressors," from the Table of Contents, and changes the title of Section 3.14 from "Shock Suppressors (snubbers)" to Snubbers.

Safety Evaluation

This is an administrative change to the Table of Contents and reflects changes made by this proposed amendment. There are no safety concerns.

Significant Hazards Determination

This is an administrative change to the Table of Contents and reflects changes made by this proposed amendment. There are no significant hazard concerns.

Technical Specification 3.14, Page TS 3.14-1

Description of Proposed Change

This change categorizes snubbers that will be subject to the Limiting Conditions for Operation of Section 3.14 as Code Class 1, 2, or 3 component snubbers instead of "Safety related" or "related to plant safety." This change also removes the requirement that all safety related snubbers must be operable before the reactor is made critical. Snubbers that support Code Class 1, 2, or 3 components will be required to be operable during plant modes which require the corresponding Code Class 1, 2, or 3 components to be operable. Also, the words "shock suppressors" have been changed to "snubbers" throughout Section 3.14.

### Safety Evaluation

The changes to Section 3.14 will:

1. Categorize snubbers that are subject to the Limiting Conditions for Operation of Section 3.14 as Code Class 1, 2, or 3 component snubbers, instead of "safety related" or "related to plant safety."
2. Require snubbers that support Code Class 1, 2, and 3 components to be operable during plant modes that require the corresponding Code Class 1, 2, or 3 components to be operable.
3. Change the words "shock suppressors" to "snubbers" throughout Section 3.14.

Categorizing snubbers subject to the Limiting Conditions for Operation of Section 3.14 as Code Class 1, 2, or 3 component snubbers provides consistency with the requirements of 10 CFR 50.55a(g)(4). 10 CFR 50.55a(g)(4) requires that all Code Class 1, 2, and 3 component snubbers shall be included in KNPP's ISI Plan and shall be inspected and tested in accordance with the ASME Code with applicable Addenda. Since Code Class 1, 2, and 3 component snubbers will be included in KNPP's ISI Plan, it is appropriate to subject these snubbers to the Limiting Conditions for Operation requirements of Section 3.14. This change is consistent with the requirements of 10 CFR 50.55a(g)(4) and does not represent a safety concern.

Requiring a snubber to be operable when the Code Class 1, 2, or 3 component that it supports is required to be operable is not a safety concern. Presently, snubbers that are considered to be safety related must be operable in order for the reactor to be made critical. However, some

systems (i.e., residual heat removal) are required to be operable when the reactor is subcritical. This change ensures that Code Class 1, 2, and 3 component snubbers are operable during all plant operating modes that require the corresponding supported components to be operable; therefore, this change does not represent a safety concern.

Changing the words "shock suppressors" to "snubbers" throughout Section 3.14 provides consistency between the Technical Specifications and the ASME Code and does not represent a safety concern.

#### Significant Hazards Determination

The following changes have been made to Section 3.14:

1. Snubbers that will be subject to the Limiting Conditions for Operation of 3.14 will be categorized as Code Class 1, 2, or 3 component snubbers instead of "safety related" or "related to plant safety."
2. Snubbers will be required to be operable during plant operation modes that require the Code Class 1, 2, or 3 components they support to be operable.
3. The words "shock suppressors" have been changed to "snubbers" throughout Section 3.14. This change is to provide consistency between the Technical Specifications and the ASME Code and does not involve a significant hazards concern.



Changes (1) and (2) will not:

1. Increase the probability or consequences of an accident previously analyzed. 10 CFR 50.55a(g)(4) requires that all Code Class 1, 2, and 3 component snubbers shall be included in the KNPP ISI Plan and shall be inspected and tested in accordance with the ASME Code. In order to be consistent with 10 CFR 50.55a(g)(4), Code Class 1, 2, and 3 component snubbers will be subject to the LCO of Section 3.14b. These snubbers will be required to be operable during plant modes that require the supported components to be operable. This will ensure that all Code Class 1, 2, and 3 component snubbers will be operationally available, when required, to reduce the consequences or probability of an accident.
2. Create the possibility of a new accident. This change ensures that Code Class 1, 2, and 3 component snubbers will be operable during plant modes that require the supported component to be operable. This will not create the possibility of a new accident previously not analyzed.
3. Reduce a margin of safety. In order to be consistent with 10 CFR 50.55a(g)(4), Code Class 1, 2, and 3 component snubbers will be subject to the LCO of Section 3.14. These snubbers will be required to be operable during plant modes that require the supported components to be operable. Since Section 3.14 presently relates safety related snubber operability to plant conditions, we believe that requiring Code Class 1, 2, and 3 component snubbers to be operable when the components they support are required to be operable will enhance safety and will not reduce a margin of safety.

Based on the above considerations, we have determined that changes (1) and (2) do not involve a significant hazard concern.

Technical Specification 3.14b, Page TS 3.14-1

Description of Proposed Change

This change is to Section 3.14b, KNPP's Limiting Conditions for Operation (LCO) concerning snubber operability. Section 3.14b has been revised for clarity, and the shutdown conditions have been revised to be consistent with other shutdown conditions in KNPP's Technical Specifications.

Safety Evaluation

Two changes have been made to Section 3.14b, KNPP's LCO concerning snubber operability. The first change is to the wording of Section 3.14b. Presently, if a snubber is found to be inoperable, it is unclear as to how much time Section 3.14b allows before the reactor is required to be shut-down. This change rewords Section 3.14b to allow a choice between repairing an inoperable snubber within 72 hours or within the time period allowed by the supported component's LCO. Since snubbers only perform their safety function during low probability events, it is appropriate to allow a Code Class 1, 2, or 3 component snubber to be inoperable for at least 72 hours. In addition, if the Code Class 1, 2, or 3 component that the snubber supports is allowed to be inoperable for longer than 72 hours, it is appropriate to allow the same time period for that snubber. This change ensures that a sufficient margin of safety is maintained and relates the safety significance of a snubber to the safety significance of the component that it supports. This change does not represent a safety concern.

The second change to Section 3.14b revises the shutdown conditions following the initiation of a reactor shutdown. Presently, if an inoperable snubber is not made operable within the time period allowed by Section 3.14b, the reactor must be in hot shutdown within 36 hours. This change revises the shutdown conditions to be consistent with other shutdown conditions in KNPP's Technical Specifications. Specifically, if a reactor shutdown is required, Section 3.14b will require that action shall be initiated within 1 hour to:

- Achieve hot standby within the next 6 hours.
- Achieve hot shutdown within the following 6 hours.
- Achieve cold shutdown within an additional 36 hours.

WPSC believes that it is more appropriate to have consistent shutdown conditions in the Technical Specifications than to have shutdown conditions that differ by a few hours or go to hot shutdown as opposed to cold shutdown. A large number of diverse shutdown conditions only makes the Technical Specifications confusing and does not increase a margin of safety. Therefore, we have determined that revising the shutdown conditions of Section 3.14b to be consistent with other shutdown conditions in KNPP's Technical Specifications is not a safety concern.

#### Significant Hazards Determination

This change is to Section 3.14b, KNPP's LCO concerning snubber operability. Section 3.14b has been revised for clarity, and the shutdown conditions have been revised to be consistent with other shutdown conditions in KNPP's Technical Specifications.

The wording of Section 3.14b is such that the intent may be misinterpreted. Specifically, if a snubber is found to be inoperable, it is unclear as to how much time Section 3.14b allows before the reactor is required to be shut down. This change rewords Section 3.14b to allow a choice between repairing an inoperable snubber within 72 hours or within the time period allowed by the supported component's LCO. Since snubbers only perform their safety function during low probability events, it is appropriate to allow a Code Class 1, 2, or 3 component snubber to be inoperable for at least 72 hours. In addition, if the Code Class 1, 2, or 3 component that the snubber supports is allowed to be inoperable for longer than 72 hours, it is appropriate to allow the same time period for that snubber. This change ensures that a sufficient margin of safety is maintained and relates the safety significance of a snubber to the safety significance of the component that it supports.

The shutdown conditions of Section 3.14b have also been revised to be consistent with other shutdown conditions in KNPP's Technical Specifications. Presently, if an inoperable snubber is not made operable within the time period allowed by Section 3.14b, the reactor must be in hot shutdown within 36 hours. With this change, if a reactor shutdown is required, Section 3.14b will require that action shall be taken within one hour to:

- Achieve hot standby within the next 6 hours.
- Achieve hot shutdown within the following 6 hours.
- Achieve cold shutdown within an additional 36 hours.

The above changes will not:

- 1) Increase the probability or consequences of an accident previously analyzed. Following this change, Code Class 1, 2, and 3 component snubbers will be allowed to be inoperable for either 72 hours or for the time period allowed by the supported component's LCO. This ensures that a sufficient margin of safety will be maintained and that Code Class 1, 2, and 3 component snubbers will be available, when required, to reduce the consequences of an accident.

The shutdown conditions of Section 3.14b have also been revised to be consistent with other shutdown conditions in KNPP's Technical Specifications. This change will not increase the probability or consequences of an accident.

- 2) Create the possibility of a new accident. This change clarifies Section 3.14b and revises the shutdown conditions to be consistent with other shutdown conditions in KNPP's Technical Specifications. This change will not create the possibility of a new accident.
- 3) Significantly reduce a margin of safety. Following this change, a Code Class 1, 2, or 3 component snubber will be allowed to be inoperable for either 72 hours or the time period allowed by the supported component's LCO. This clarifies Section 3.14b and ensures that a sufficient margin of safety is maintained; therefore, we have determined that this change will not significantly reduce a margin of safety.

The shutdown conditions of Section 3.14b have also been revised to be consistent with other shutdown conditions in KNPP's Technical Specifications. This change will not reduce a margin of safety.

Based on the above information we have determined that these changes to Section 3.14b do not represent a significant hazards concern.

Basis, Technical Specification 3.14, Page TS 3.14-2

Description of Proposed Change

The Basis for Section 3.14 has been revised to reflect the changes made to Section 3.14 by this proposed amendment. All references made to "safety related" snubbers have been removed from the Basis. Snubbers that are subject to the LCO of Section 3.14 will be referred to as Code Class 1, 2, and 3 component snubbers.

Also, the Basis will now explain that the snubbers that are subject to the LCO of Section 3.14 will be required to be operable during plant modes that require the supported components to be operable. Section 3.14 presently requires that "safety related" snubbers must be operable before the reactor is made critical.

The final change made to the Basis is a clarification of the time allowed for snubber inoperability. The present wording of Section 3.14b is confusing and it is unclear as to how much time is allowed before a reactor shutdown is required. Section 3.14b has been revised to allow either 72 hours or the time period allowed by the supported component's LCO to repair or replace an inoperable snubber. The Basis has been revised to reflect this change.

Safety Evaluation

This change is to the Basis of Section 3.14 and reflects changes made to Section 3.14 by this proposed amendment; there are no safety concerns.

Significant Hazards Determination

This change is to the Basis for Technical Specification 3.14 and will not:

- 1) Increase the probability or consequences of an accident previously analyzed.
- 2) Create the possibility of a new accident.
- 3) Reduce a margin of safety.

The revised basis is for a technical specification that does not involve a significant hazard concern; therefore, we have determined that the revised basis does not involve a significant hazard concern.

Technical Specification 4.2a.1, Page TS 4.2-1

Description of Proposed Change

This change deletes from Technical Specification 4.2a.1, the reference to the snubber testing and surveillance requirements of Technical Specifications 3.14 and 4.14. Testing and surveillance of Class 1, 2, and 3 component snubbers will be in accordance with the second ten-year KNPP Inservice Inspection Plan developed in accordance with 10 CFR 50.55a(g)(4).

Safety Evaluation

10 CFR 50.55a(g)(4) requires that all Code Class 1, 2, and 3 component snubbers shall be included in KNPP's ISI Plan and shall be inspected and tested in accordance with the ASME Code with applicable Addenda. This Proposed Amendment deletes the snubber testing and surveillance requirements from the Technical Specifications and includes the appropriate snubbers in the ISI Plan. All snubbers that support Code Class 1, 2, and 3 components and are not in KNPP's present snubber program will be included in the ISI Plan. All snubbers that are included in KNPP's present snubber program will be included in the ISI Plan; however, some of these snubbers do not support Code Class 1, 2, or 3 components and will not be considered to be Code Class 1, 2, or 3 component snubbers. Snubbers that are not Code Class 1, 2, or 3 component snubbers may be considered for removal from the ISI Plan following a safety evaluation performed on each of these snubbers. WPSC believes that it is important to evaluate these snubbers on an individual basis prior to removal from the ISI Plan, even though the ASME Code does not require that these snubbers be inspected or tested.

In summary, the inspection and testing of ASME Code Class 1, 2, and 3 component snubbers in accordance with the ASME Code with applicable Addenda is required by 10 CFR 50.55a(g)(4) and is intended to enhance safety.

Therefore, we have determined that this change does not involve a safety concern.



### Significant Hazards Determination

This change deletes the reference to the snubber testing and surveillance requirements in Technical Specifications 3.14 and 4.14. Testing and surveillance of Code Class 1, 2, and 3 component snubbers will be in accordance with the second ten-year ISI Plan developed in accordance with 10 CFR 50.55a(g)(4).

This change will not:

- 1) Increase the probability or consequences of an accident previously analyzed. The inspection and testing of ASME Code Class 1, 2, and 3 snubbers in accordance with the ASME Code is a NRC Staff approved method of verifying operability and is required by 10 CFR 50.55a(g)(4). The verification of snubber operability is intended to ensure snubber availability to reduce the probability or consequences of an accident.
- 2) Create the possibility of a new accident. The inspection and testing of Class 1, 2, and 3 snubbers to verify operability does not create the possibility of a new accident.
- 3) Reduce a safety margin. The inspection and testing of snubbers in accordance with the ASME Code is a NRC endorsed method of verifying the operability of snubbers; therefore, this change will not reduce a safety margin.

Based on the above considerations we have determined that this change does not involve a significant hazard concern.

Technical Specification 4.2a.1, Page TS 4.2-1

Description of Proposed Change

This change moves the functional testing exemption of the steam generator Anchor Holth suppressors from Technical Specification 4.14b to Technical Specification 4.2a.1.

Safety Evaluation

The Anchor Holth suppressors are exempt from functional testing per Technical Specification 4.14b. This revision moves that exemption to Technical Specification 4.2a.1 due to the deletion of Technical Specification 4.14b by this proposed amendment. The change is administrative in nature; therefore, we have determined that this change does not involve a safety concern.

Significant Hazards Determination

This change will not:

- 1) Increase the probability or consequences of an accident previously analyzed. This change is an administrative relocation of a NRC Staff approved technical specification.
- 2) Create the possibility of a new accident. This change is an administrative relocation of a NRC Staff approved technical specification.
- 3) Reduce a safety margin. This change is an administrative relocation of a NRC Staff approved technical specification.

Based on the above considerations, we have determined that this change does not involve a significant hazard concern.

Basis, Technical Specification 4.2, Page 4.2-8

Description of Proposed Change

The basis for Technical Specification 4.2 has been changed to include reference to the testing of ASME Code Class 1, 2, and 3 component supports in accordance with Section XI of the ASME Code. The exemption for the functional testing of the 900 Kip Anchor Bolt steam generator suppressors is also being added to the basis of Section 4.2. The basis for this exemption previously existed in Section 4.14 of the Technical Specifications.

The basis for Technical Specification 4.2a.3 concerning surveillance testing of pressure isolation valves was inadvertently removed by Approved Amendment No. 55, submitted on January 13, 1984 as Proposed Amendment No. 57. The basis has been replaced in order to correct this administrative error.

Safety Evaluation

This change is to the Basis of Section 4.2a.1 and reflects changes made to Section 4.2a.1 by this proposed amendment. This change also replaces a section of the basis that was inadvertently removed by Approved Amendment No. 55. There are no safety concerns.

### Significant Hazards Determination

This change is to the basis for Technical Specification 4.2 and will not:

- 1) Increase the probability or consequences of an accident previously analyzed.
- 2) Create the possibility of a new accident.
- 3) Reduce a margin of safety.

The revised basis is for a technical specification that does not involve a significant hazard concern; therefore, we have determined that the revised basis does not involve a significant hazard concern.

### Technical Specification 4.14, Pages TS 14.1, 2, 3, 3a

#### Description of Proposed Change

Technical Specification 4.14 has been deleted in its entirety.

#### Safety Evaluation

This change removes the "detailed" testing and surveillance requirements of safety related snubbers from the technical specifications. The inspection and testing of Code Class 1, 2, and 3 component snubbers will be performed in accordance with the ASME Code as required by 10 CFR 50.55a(g)(4) and will be a part of KNPP's Inservice Inspection Plan.

At the time of the development of Technical Specification 4.14, there were no specific requirements in the ASME Code for the inspection and testing of snubbers; therefore, snubber testing and surveillance requirements were developed and included in the technical specifications.

10 CFR 50.55a(g)(4) requires that Code Class 1, 2, and 3 component supports (including snubbers) meet the inspection and testing requirements of the ASME Code. This change is in compliance with the Code of Federal Regulations and is intended to enhance safety; therefore, there are no safety concerns.

#### Significant Hazards Determination

This change removes the "detailed" testing and surveillance requirements of safety related snubbers from the technical specifications. Snubber inspection and testing requirements will be included as part of Technical Specification 4.2, ASME Code Class Inservice Inspection and Testing.

This change will not:

- 1) Increase the probability or consequences of an accident previously analyzed. In order to avoid following redundant snubber inspection and testing requirements, the snubber surveillance and testing requirements detailed in Section 4.14 of the technical specifications have been deleted in order to implement the ASME inservice inspection and testing requirements of Technical Specification 4.2. Snubber inspection and testing in accordance with the ASME Code is a Staff approved method for verifying snubber operability and is required by 10 CFR 50.55a(g)(4).

This change enhances safety by ensuring Class 1, 2, and 3 component snubbers are operationally available (through Staff approved snubber inspection and testing methods) to reduce the consequences of an accident.

- 2) Create the possibility of a new accident. This change is to the snubber inspection and testing requirements of KNPP's snubber program. Snubber inspection and testing will be performed in accordance with the ASME Code (required by 10 CFR 50.55a(g)) and will not create the possibility of a new accident.
- 3) Reduces a margin of safety. The inspection and testing of Code Class 1, 2, and 3 component snubbers in accordance with the ASME Code is a Staff approved method for verifying snubber operability and is required by 10 CFR 50.55a(g)(4). This change requires testing in accordance with the ASME Code. Since the code requirements are developed by persons knowledgeable in snubber operation and testing and are subsequently reviewed and approved by NRC endorsement in 10 CFR 50.55a(g)(4) we have determined that the change does not reduce a margin of safety.

Based on the above considerations, we have determined that this change does not involve a safety concern.