Attachment 2

To Letter from

C. W. Giesler to H. R. Denton

Dated May 1, 1986

Affected Pages

3.14 SNUBBERS | 73

Applicability

Applies to the operability of snubbers that support ASME Code Class 1, 2 & 3 components. | 73

Objective

To ensure that snubbers that are used to support ASME Code Class 1, 2, and 3 components under dynamic load conditions are functional during plant modes that require the corresponding Code Class 1, 2, and 3 components to be operable. | 73

Specification

a. All snubbers that support Code Class 1, 2, and 3 components shall be operable during plant modes that require the corresponding Code Class 1, 2, and 3 components to be operable, except as noted in 3.14.b.

b. If any ASME Code Class 1, 2, or 3 component snubber is found inoperable, either of the following actions shall be taken:

   1. Within 72 hours, the inoperable snubber shall be restored to an operable condition or replaced with a spare of similar specification. If the snubber cannot be repaired or replaced within 72 hours, action shall be initiated within 1 hour to:
      --Achieve Hot Standby within the next 6 hours. | 73
      --Achieve Hot Shutdown within the following 6 hours.
      --Achieve Cold Shutdown within an additional 36 hours.
   2. The snubber shall be made operable, or replaced with a spare of similar specification, within the time period allowed by the supported component's Limiting Condition for Operation. If the snubber cannot be made operable within this time period, 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.

Basis

Snubbers are designed to prevent unrestrained pipe motion under dynamic loads, as might occur during seismic activity or severe plant transients, 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 event or other events initiating dynamic loads. Therefore, it is important to ensure that a supported component will be restrained under dynamic loads that may occur when that component is required to be operable. This specification requires that all Code Class 1, 2, and 3 component snubbers shall be operable during plant modes that require the corresponding Code Class 1, 2, or 3 component to be operable. | 73 | 73

Because the protection afforded by snubbers is required only during low probability events, Specification 3.14.b allows either 72 hours or the time period allowed by the supported component's Limiting Condition for Operation to repair or replace an inoperable snubber before reactor shutdown is required. | 73

4.2 ASME CODE CLASS IN-SERVICE INSPECTION AND TESTING

Applicability

Applies to in-service structural surveillance of the ASME Code Class components and supports and functional testing of pumps and valves.

Objective

To assure the continued integrity and operational readiness of ASME Code Class 1, 2 and 3 components.

Specification

a. ASME Code Class 1, 2 and 3 Components and Supports

1. Inservice inspection of ASME Code Class 1, Class 2 and Class 3 components and supports shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50 Section 50.55a(g), except where relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i). The Anchor Holth suppressors used on the steam generators are exempt from functional testing requirements. | 73

2. Inservice testing of ASME Code Class 1, Class 2 and Class 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).

3. Surveillance testing of pressure isolation valves:

   a. Periodic leakage testing (1) on each valve listed on Table TS 3.1-2 shall be accomplished prior to entering the operating mode after every time the plant is placed in the cold shutdown condition for refueling, after each time the plant is placed in a

Basis

The plant was not specifically designed to meet the requirements of Section XI of the ASME Code; therefore, 100 percent compliance may not be feasible or practical. However, access for inservice inspection was considered during the design and modifications have been made where practical to make provisions for maximum access within the limits of the current plant design. Where practical, the inspection of ASME Code Class 1, Class 2 and Class 3 components and supports is performed in accordance with Section XI of the ASME Code. If a code required inspection is impractical, a request for a deviation from the requirement is submitted to the Commission for approval. The Anchor Holth suppressor used on the steam generators are exempt from the functional test requirements due to the impractacability of functionally testing 900 Kip suppressors. The ASME Code does not provide guidance for functionally testing snubbers greater than 50 Kips. 73 73

The Surveillance Requirements for inspection of the steam generator tubes ensure that the structural integrity of this portion of the RCS will be maintained. The program for inservice inspection of steam generator tubes is based on the general guidance of Regulatory Guide 1.83, Revision 1. Inservice inspection of steam generator tubing is essential in order to maintain surveillance of the conditions of the tubes in the event that there is evidence of mechanical damage or progressive degradation due to design, manufacturing errors, or inservice conditions that lead to corrosion. Inservice inspection of steam generator tubing also provides a means of characterizing the nature and cause of any tube degradation so that corrective measures can be taken.

The Surveillance Requirements for testing of the Reactor Coolant System Pressure Isolation Valves identified in Table TS 3.1-2 are based on the requirements of "Order of Modification of License" dated April 20, 1981. 73

Pages TS 4.14-1 through TS 4.14-3a have been deleted. | 73