

Exhibit B

Monticello Nuclear Generating Plant

License Amendment Request Dated April 15, 1992

Technical Specification Pages Marked Up
with Proposed Wording Changes

Exhibit B consists of the existing Technical Specification pages marked up with the proposed changes. Pages affected by this change are listed below:

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132a (new page)
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3.0 LIMITING CONDITIONS FOR OPERATION

H. Snubbers

1. Except as permitted below, all safety related snubbers shall be operable whenever the supported system is required to be Operable.
2. With one or more snubbers made or found to be inoperable for any reason when Operability is required, within 72 hours:
 - a. Replace or restore the inoperable snubbers to Operable status and perform an engineering evaluation or inspection of the supported components, or
 - b. Determine through engineering evaluation that the as-found condition of the snubber had no adverse effect on the supported components and that they would retain their structural integrity in the event of design basis seismic event, or
 - c. Declare the supported system inoperable and take the action required by the Technical Specifications for inoperability of that system.

3.6/4.6

4.0 SURVEILLANCE REQUIREMENTS

H. Snubbers

The following surveillance requirements apply to all safety related snubbers.

1. Visual inspections ~~of snubbers shall be conducted in accordance with the following schedule:~~

No. of Snubbers Found	Next Required
Inoperable per	Inspection Period
0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3,4	124 days ± 25%
5,6,7	62 days ± 25%
8 or more	31 days ± 25%

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

~~Snubbers are may be categorized as inaccessible or accessible in two groups, "accessible" or "Inaccessible" based on their accessibility for inspection during reactor operation. Each of these categories (inaccessible or accessible) may be inspected independently according to the schedule determined by Table 4.6-1. These two groups may be inspected independently according to the above schedule. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.6-1. The initial inspection interval for new types of snubbers shall be established at 18 months~~

3.0 LIMITING CONDITIONS FOR OPERATION

3. All safety-related snubbers installed or planned for use at Monticello are hydraulic snubbers. No mechanical snubbers are used on safety-related systems at Monticello. If installed in the future, appropriate Technical Specifications changes will be proposed within 60 days of installation.

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4.0 SURVEILLANCE REQUIREMENTS

+/- 25%

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2. Visual inspections shall verify that (1) the snubber has ~~there are~~ no visible indications of damage or impaired operability, (2) attachments to the foundation or supporting structure are ~~secure~~ functional, and (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional.

Snubbers which appear to be inoperable as a result of visual inspection shall be classified as unacceptable, but may be reclassified as acceptable ~~determined Operable~~ for the purpose of establishing the next visual inspection interval, provided that ~~by a-~~ (1) the cause of the rejection is clearly established and remedied ~~the cause of the rejection~~ for that particular snubber and for others snubbers, Irrespective of type, that may be generically susceptible; and ~~b-(2) the affected snubber is~~ ~~Functionally tested~~ the affected snubber in the as-found condition and ~~determined~~ ~~finding it~~ Operable per Specification 4.6.H.4. However, when the fluid plunger gauge of a hydraulic snubber is below low range, the snubber shall be considered inoperable for the purposes of establishing the next visual inspection interval.

A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the action requirements shall be met.

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Table 4.6-1

SNUBBER VISUAL INSPECTION INTERVALNumber of Unacceptable Snubbers

<u>Population or Category (Notes 1 and 2)</u>	<u>Column A Extend Interval (Notes 3 and 6)</u>	<u>Column B Repeat Interval (Notes 4 and 6)</u>	<u>Column C Reduce Interval (Notes 5 and 6)</u>
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25

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, that decision must be made and documented before any inspection and that decision shall be used as the basis upon which to determine 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.

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: All inspection intervals up to and including 48 months may be adjusted a maximum of plus or minus 25%.

H. Snubbers

All snubbers are required to be operable above Cold Shutdown 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 excluded from this inspection program 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.

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 sample population size and~~ the number of inoperable snubbers found during an inspection. Inspections performed before that interval has elapsed may be used as 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 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 feature directly related to rejection of the snubber.

When a snubber is found inoperable, an engineering evaluation or inspection 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. The evaluation or inspection will determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

Exhibit C

Monticello Nuclear Generating Plant

License Amendment Request Dated April 15, 1992

Revised Monticello Technical Specification Pages

Exhibit C consists of revised Technical Specification pages that incorporate the proposed changes. The pages included in this exhibit are:

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3.0 LIMITING CONDITIONS FOR OPERATION

H. Snubbers

1. Except as permitted below, all safety related snubbers shall be operable whenever the supported system is required to be Operable.
2. With one or more snubbers made or found to be inoperable for any reason when Operability is required, within 72 hours:
 - a. Replace or restore the inoperable snubbers to Operable status and perform an engineering evaluation or inspection of the supported components, or
 - b. Determine through engineering evaluation that the as-found condition of the snubber had no adverse effect on the supported components and that they would retain their structural integrity in the event of design basis seismic event, or
 - c. Declare the supported system inoperable and take the action required by the Technical Specifications for inoperability of that system.

3.6/4.6

4.0 SURVEILLANCE REQUIREMENTS

H. Snubbers

The following surveillance requirements apply to all safety related snubbers.

1. Visual inspections:

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible or accessible) may be inspected independently according to the schedule determined by Table 4.6-1. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.6-1. The initial inspection interval for new types of snubbers shall be established at 18 months +/- 25%.

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3.0 LIMITING CONDITIONS FOR OPERATION

3. All safety-related snubbers installed or planned for use at Monticello are hydraulic snubbers. No mechanical snubbers are used on safety-related systems at Monticello. If installed in the future, appropriate Technical Specifications changes will be proposed within 60 days of installation.

4.0 SURVEILLANCE REQUIREMENTS

2. Visual inspections shall verify that (1) the snubber has no visible indications of damage or impaired operability, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional.

Snubbers which appear to be inoperable as a result of visual inspection shall be classified as unacceptable, but may be reclassified as acceptable 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, irrespective of type, that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined Operable per Specification 4.6.H.4.

A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the action requirements shall be met.

Table 4.6-1

SNUBBER VISUAL INSPECTION INTERVALNumber of Unacceptable Snubbers

<u>Population or Category (Notes 1 and 2)</u>	<u>Column A Extend Interval (Notes 3 and 6)</u>	<u>Column B Repeat Interval (Notes 4 and 6)</u>	<u>Column C Reduce Interval (Notes 5 and 6)</u>
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- 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, that decision must be made and documented before any inspection and that decision shall be used as the basis upon which to determine 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.
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- 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: All inspection intervals up to and including 48 months may be adjusted a maximum of plus or minus 25%.

H. Snubbers

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The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval is determined by the sample population size and the number of inoperable snubbers found during an inspection. Inspections performed before that interval has elapsed may be used as 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 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 feature directly related to rejection of the snubber.

When a snubber is found inoperable, an engineering evaluation or inspection 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. The evaluation or inspection will determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.