

ATTACHMENT "A"  
EXISTING SPECIFICATIONS  
UNIT 2

9105070185 910502  
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PDR

## PLANT SYSTEMS

### 3/4.7.6 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

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3.7.6 All snubbers shall be OPERABLE. The only snubbers excluded from this requirement are those installed on nonsafety-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.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

#### ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.6.g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

#### SURVEILLANCE REQUIREMENTS

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4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

The first inservice visual inspection of snubbers shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers. If less than two snubbers are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months  $\pm$  25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

<u>No. Inoperable Snubbers per Inspection Period</u>	<u>Subsequent Visual Inspection Period*# ##</u>
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 snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, and (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to (a) the component or pipe and (b) the snubber anchorage are secure. Snubbers which appear inoperable as a result of visual inspections 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 4.7.6.e or 4.7.6.f, as applicable. However, when a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

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

# The provisions of Specification 4.0.2 are not applicable.

## 20 months ± 25% for inspections conducted during the Cycle 5 refueling outage.

## PLANT SYSTEMS

### BASES

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#### 3/4.7.6 SNUBBERS

All snubbers are required OPERABLE 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 nonsafety 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.

For visual inspection snubbers are categorized into two (2) groups, those accessible and those inaccessible during reactor operation. For functional testing, snubbers are categorized into types by design and manufacturer, irrespective of capacity. For example, Pacific Scientific snubbers are divided into four types corresponding to different design features: PSA 1/4 and 1/2 are one type; PSA 1, 3, and 10 are another; PSA 6 is another; and PSA 35 and 100 are a fourth type.

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 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. Amendment No. 85 allows a one time extension of the inspection period during Cycle 5 operation while the NRC develops generic guidance applicable to 24 month operating cycles.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shut-downs at refueling intervals.

Hydraulic snubbers and mechanical snubbers may each be treated as a different entity for the above surveillance programs.

ATTACHMENT "B"  
EXISTING SPECIFICATIONS  
UNIT 3

PLANT SYSTEMS

3/4.7.6 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.6 All snubbers shall be OPERABLE. The only snubbers excluded from this requirement are those installed on nonsafety-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.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.6.g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

The first inservice visual inspection of snubbers shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers. If less than two snubbers are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months  $\pm$  25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

<u>No. Inoperable Snubbers per Inspection Period</u>	<u>Subsequent 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%
8 or more	31 days $\pm$ 25%

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

#The provisions of Specification 4.0.2 are not applicable.

##20 months  $\pm$  25% for inspections conducted during the Cycle 4 refueling outage.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

#### c. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, and (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to (a) the component or pipe and (b) the snubber anchorage are secure. Snubbers which appear inoperable as a result of visual inspections 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 4.7.6.e or 4.7.6.f, as applicable. However, when a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

#### d. Functional Tests\*

At least once per refueling interval during shutdown, a representative sample of at least 15% of the total of each type of snubber in use in the plant shall be functionally tested either in place or in a bench test. For each snubber of a type of that does not meet the functional test acceptance criteria of Specification 4.7.6.e or 4.7.6.f, an additional 15% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. 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.)
3. Snubbers within 10 feet of the discharge from safety relief valve.

\*Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

## PLANT SYSTEMS

### BASES

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#### 3/4.7.6 SNUBBERS

All snubbers are required OPERABLE 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 nonsafety 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.

For visual inspection snubbers are categorized into two (2) groups, those accessible and those inaccessible during reactor operation. For functional testing, snubbers are categorized into types by design and manufacturer, irrespective of capacity. For example, Pacific Scientific snubbers are divided into four types corresponding to different design features: PSA 1/4 and 1/2 are one type; PSA 1, 3, and 10 are another; PSA 6 is another; and PSA 35 and 100 are a fourth type.

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 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. Amendment No. 64 allows a one time extension of the inspection period during Cycle 4 operation while the NRC develops generic guidance applicable to 24 month operating cycles.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at refueling intervals.

Hydraulic snubbers and mechanical snubbers may each be treated as a different entity for the above surveillance programs.

ATTACHMENT "C"  
PROPOSED SPECIFICATIONS  
UNIT 2

PLANT SYSTEMS

3/4. 7. 6 SNUBBERS

LIMITING CONDITION FOR OPERATION

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3.7.6 All snubbers shall be OPERABLE. The only snubbers excluded from this requirement are those installed on nonsafety-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.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

ACTION:

With one or more snubbers INOPERABLE, within 72 hours replace or restore the INOPERABLE snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.6.g on the attached component or declare the attached system INOPERABLE and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

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4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

~~The first inservice visual inspection of snubbers shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers. If less than two snubbers are found INOPERABLE during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months ± 25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:~~

<del>No. INOPERABLE Snubbers Per inspection Period</del>	<del>Subsequent Visual Inspection Period** ##</del>
<del>0</del>	<del>18 months ± 25%</del>
<del>1</del>	<del>12 months ± 25%</del>
<del>2</del>	<del>6 months ± 25%</del>
<del>3,4</del>	<del>124 days ± 25%</del>
<del>5,6,7</del>	<del>62 days ± 25%</del>
<del>8 or more</del>	<del>31 days ± 25%</del>

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

~~#The provisions of Specification 4.0.2 are not applicable.~~

~~##20 months ± 25% for inspections conducted during the Cycle 5 refueling~~

outage.

~~The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.~~

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7-2. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in Table 4.7-2 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before amendment (\*).

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, and (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to (a) the component or pipe and (b) the snubber anchorage are secure. Snubbers which appear INOPERABLE as a result of visual inspections ~~may be determined~~ shall be classified as INOPERABLE and may be reclassified 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 4.7.6.e or 4.7.6.f, as applicable. However, when a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined INOPERABLE and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers found connected to an INOPERABLE common hydraulic fluid reservoir shall be counted as INOPERABLE snubbers for determining the next inspection interval. A review and evaluation shall be performed and documented to justify continued operation with an INOPERABLE snubber. If continued operation cannot be justified, the snubber shall be declared INOPERABLE and the ACTION requirements shall be met.

\*NRC will include the number of the license amendment that implements this change.

**TABLE 4.7-2  
 SNUBBER VISUAL INSPECTION INTERVAL**

**NUMBER OF INOPERABLE SNUBBERS**

Population or Category (Notes 1 and 2)	Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

**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 INOPERABLE 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, the licensee must make and document that decision before any inspection and shall use that decision 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 INOPERABLE 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 INOPERABLE snubbers as determined by interpolation.

**Note 3:** If the number of INOPERABLE 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 INOPERABLE 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 INOPERABLE 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 INOPERABLE 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 INOPERABLE 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: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

## PLANT SYSTEMS

### BASES

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#### 3/4.7.6 SNUBBERS

All snubbers are required OPERABLE 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 nonsafety 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.

For visual inspection snubbers are ~~may be~~ categorized into two (2) groups, those accessible and those inaccessible during reactor operation. For functional testing, snubbers are categorized into types by design and manufacturer, irrespective of capacity. For example, Pacific Scientific snubbers are divided into four types corresponding to different design features: PSA 1/4 and 1/2 are one type; PSA 1, 3, and 10 are another; PSA 6 is another; and PSA 35 and 100 are a fourth type.

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 number of INOPERABLE snubbers found during an inspection, based upon the number of INOPERABLE snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories and the previous inspection interval as specified in NRC Generic Letter 90-09, "Alternative Requirements For Snubber Visual Inspection Intervals and Corrective Actions."~~ 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. ~~Amendment No. 85 allows a one time extension of the inspection period during Cycle 5 operation while the NRC develops generic guidance applicable to 24 month operating cycles.~~

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at refueling intervals.

~~If a review and evaluation of an INOPERABLE snubber is performed and documented to justify continued operation and provided that all design criteria are met with the INOPERABLE snubber, then the INOPERABLE snubber would not need to be restored or replaced as stated in TS 3/4.7.6 "ACTION."~~

Hydraulic snubbers and mechanical snubbers may each be treated as a different entity for the above surveillance programs.

NPF-10/15-352

ATTACHMENT "D"  
PROPOSED SPECIFICATIONS  
UNIT 3

PLANT SYSTEMS

3/4.7.6 SNUBBERS

LIMITING CONDITION FOR OPERATION

3-7.6 All snubbers shall be OPERABLE. The only snubbers excluded from this requirement are those installed on nonsafety-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.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

ACTION:

With one or more snubbers INOPERABLE, within 72 hours replace or restore the INOPERABLE snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.6.g on the attached component or declare the attached system INOPERABLE and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

~~The first inservice visual inspection of snubbers shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers. If less than two snubbers are found INOPERABLE during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months  $\pm$  25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:~~

<del>No. INOPERABLE Snubbers Per inspection Period</del>	<del>Subsequent Visual Inspection Period**</del>
<del>0</del>	<del>18 months <math>\pm</math> 25%**</del>
<del>1</del>	<del>12 months <math>\pm</math> 25%**</del>
<del>2</del>	<del>6 months <math>\pm</math> 25%</del>
<del>3,4</del>	<del>124 days <math>\pm</math> 25%</del>
<del>5,6,7</del>	<del>62 days <math>\pm</math> 25%</del>
<del>8 or more</del>	<del>31 days <math>\pm</math> 25%</del>

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

~~#The provisions of Specification 4.0.2 are not applicable.~~

~~##20 months  $\pm$  25% for inspections conducted during the Cycle 4 refueling~~

outage.

~~The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.~~

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7-2. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in Table 4.7-2 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before amendment (\*).

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, and (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to (a) the component or pipe and (b) the snubber anchorage are secure. Snubbers which appear INOPERABLE as a result of visual inspections ~~may be determined shall be classified as INOPERABLE and may be reclassified 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 4.7.6.e or 4.7.6.f, as applicable. However, when a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined INOPERABLE and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers found connected to an INOPERABLE common hydraulic fluid reservoir shall be counted as inoperable snubbers for determining the next inspection interval. A review and evaluation shall be performed and documented to justify continued operation with an INOPERABLE snubber. If continued operation cannot be justified, the snubber shall be declared INOPERABLE and the ACTION requirements shall be met.

\*NRC will include the number of the license amendment that implements this change.

TABLE 4.7-2  
**SNUBBER VISUAL INSPECTION INTERVAL**

**NUMBER OF INOPERABLE SNUBBERS**

Population or Category (Notes 1 and 2)	Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

**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 INOPERABLE 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, the licensee must make and document that decision before any inspection and shall use that decision 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 INOPERABLE 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 INOPERABLE snubbers as determined by interpolation.

**Note 3:** If the number of INOPERABLE 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 INOPERABLE 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 INOPERABLE 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

INOPERABLE 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 INOPERABLE 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: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

## PLANT SYSTEMS

### BASES

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#### 3/4.7.6 SNUBBERS

All snubbers are required OPERABLE 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 nonsafety 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.

For visual inspection snubbers are ~~may be~~ categorized into two (2) groups, those accessible and those inaccessible during reactor operation. For functional testing, snubbers are categorized into types by design and manufacturer, irrespective of capacity. For example, Pacific Scientific snubbers are divided into four types corresponding to different design features: PSA 1/4 and 1/2 are one type; PSA 1, 3, and 10 are another; PSA 6 is another; and PSA 35 and 100 are a fourth type.

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 number of INOPERABLE snubbers found during an inspection, based upon the number of INOPERABLE snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories and the previous inspection interval as specified in NRC Generic Letter 90-09, "Alternative Requirements For Snubber Visual Inspection Intervals and Corrective Actions."~~ 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. ~~Amendment No. 64 allows a one time extension of the inspection period during Cycle 4 operation while the NRC develops generic guidance applicable to 24 month operating cycles.~~

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at refueling intervals.

~~If a review and evaluation of an INOPERABLE snubber is performed and documented to justify continued operation and provided that all design criteria are met with the INOPERABLE snubber, then the INOPERABLE snubber would not need to be restored or replaced as stated in TS 3/4.7.6 "ACTION."~~

Hydraulic snubbers and mechanical snubbers may each be treated as a different entity for the above surveillance programs.