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SUBJECT: Application for amends to Licenses NPF-10 & NPF-15, changing
 Tech Specs to clarify that visual insp shall verify that
 fasteners at both snubber ends secure by adding third
 surveillance acceptance criteria. Fee paid.

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December 12, 1985

Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Director
PWR Project Directorate No. 7
Division of PWR Licensing - B
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

Enclosed for your review and approval is a proposed change to the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 Technical Specifications. The proposed change (PCN NPF-10/15-212) revises Technical Specification 3/4.7.6 "Snubbers." The proposed revisions to Technical Specification 3/4.7.6 (1) provide clarification that visual inspections shall verify that fasteners at both snubber ends are secure by adding a third surveillance acceptance criteria and (2) revise the schedule for inspection of all snubbers attached to sections of safety systems which have experienced unexpected, potentially damaging transients from only during refueling outages to within six (6) months following determination that such an event has occurred.

Submittal of these changes to Technical Specification 3/4.7.6 hereby meets the commitment made by SCE in the August 9, 1985 SCE to NRC letter. Note that these Technical Specification revisions exceed the requirements of the current NRC formal position on Technical Specifications for safety related snubbers identified in NRC Generic Letter 84-13 dated May 3, 1984.

The Southern California Edison Company requests prompt review and approval of the proposed change. In accordance with 10 CFR 170.12, enclosed is the required amendment application fee of \$150.00. A formal request for this change will be included in our next formal amendment application.

If you have any questions regarding the enclosed information, please call me.

Very truly yours,

M. O. Medford

Enclosure

cc: Joseph O. Ward, California Department of Health Services
Harry Rood, NRC (to be opened by addressee only)
F. R. Huey (USNRC Senior Resident Inspector)

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Rood
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DESCRIPTION OF PROPOSED CHANGE
NPF-10-212 AND NPF-15-212
AND SAFETY ANALYSIS

This is a request to revise Specification 3/4.7.6, "Snubbers" of the Technical Specifications for San Onofre Nuclear Generating Station Units 2 and 3.

Existing Technical Specifications

Unit 2: See Attachment A
Unit 3: See Attachment B

Proposed Technical Specifications

Unit 2: See Attachment C
Unit 3: See Attachment D

Description

Modifications to the existing San Onofre Units 2 and 3 Technical Specifications are hereby proposed to provide clarification that visual inspections shall verify that fasteners at both snubber ends are secure and to revise the schedule for inspection of all snubbers attached to sections of safety systems which have experienced unexpected, potentially damaging transients from only during refueling outages to within six months following determination that such an event has occurred.

1) Specification 4.7.6.c - Visual Inspection Acceptance Criteria

The first sentence of the existing specification is the following:

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.

The proposed change provides clarification of item (2) that the visual inspections shall verify that fasteners at both snubber ends are secure by adding a third surveillance acceptance criteria so that the first sentence of Visual Inspection Acceptance Criteria will be the following:

Visual inspections shall verify that (1) 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.

2) Specification 4.7.6.j - Refueling Outage Inspections

The first sentence of the existing specification is the following:

During each refueling outage an inspection shall be performed of snubbers attached to sections of safety systems piping that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems.

The proposed change revises the schedule for transient event inspections from only during refueling outages to within 6 months following a determination that an unexpected potentially damaging transient has occurred. Specification 4.7.6.j will be titled and the first sentence will be the following:

4.7.6.j Transient Event Inspections

An inspection shall be performed on all hydraulic and mechanical snubbers attached to sections of safety systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems within 6 months following a determination that such an event has occurred.

Safety Analysis

The proposed change discussed above shall be deemed to constitute a significant hazards consideration if there is a positive finding in any of the following areas:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change maintains the same operability requirements as the existing Technical Specification, thus there is no increase in the probability or consequences of an accident previously evaluated.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change maintains the same operability requirements as the existing Technical Specification, thus it does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Will operation of the facility in accordance with this proposed amendment involve a significant reduction in the margin of safety?

Response: No

The proposed change maintains the same operability requirements as the existing Technical Specifications, thus there is no reduction in a margin of safety.

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (11) relates to a change that constitutes an additional limitation, restriction or control not presently included in the technical specifications: for example a more stringent surveillance requirement. The proposed change is representative of example (11) in that it adds additional controls in surveillance requirements which are in excess of the requirements of NRC Generic Letter 84-13.

Safety and Significant Hazards Determination

Based on the above discussion, the proposed change does not involve a significant hazards consideration in that it does not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. In addition, it is concluded that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (2) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Environmental Statement.

TDM:5345F

ATTACHMENT A

EXISTING TECHNICAL SPECIFICATION 3/4.7.6

SAN ONOFRE NUCLEAR GENERATING STATION

UNIT 2

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

<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 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. 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.

SEP 24 1985

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

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 caused by manufacturer or design deficiency all snubbers of the same type subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated in Specification 4.7.6.e. or 4.7.6.f. for snubbers not meeting the functional test acceptance criteria.

h. Functional Testing of Repaired and Replaced Snubbers

Snubbers which fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers which have repairs which might affect the functional test result shall be tested to meet the functional test criteria before installation in the unit. These snubbers shall have met the acceptance criteria subsequent to their most recent service, and the functional test must have been performed within 12 month before being installed in the unit.

i. Snubber Service Life Monitoring

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 6.10.2.1.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, 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 reevaluated 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 reevaluation, replacement or reconditioning shall be indicated in the records.

j. Refueling Outage Inspections

During each refueling outage an inspection shall be performed of snubbers attached to sections of safety systems piping that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems. In addition to satisfying the visual inspection acceptance criteria, freedom of motion of mechanical snubbers shall be verified using one of the following: (i) manually induced snubber movement; (ii) evaluation of in-place snubber piston setting; (iii) stroking the mechanical snubber through its full range of travel.

SEP 24 1985

ATTACHMENT B

EXISTING TECHNICAL SPECIFICATION 3/4.7.6

SAN ONOFRE NUCLEAR GENERATING STATION

UNIT 3

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. 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 18 months during shutdown, a representative sample of at least 10% 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 10% 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

SURVEILLANCE REQUIREMENTS (Continued)

i. Snubber Service Life Monitoring

A record of the service life of each snubber, the date at which the designated service life commences and installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 6.10.2.1.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, 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 reevaluated 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 reevaluation, replacement or reconditioning shall be indicated in the records.

j. Refueling Outage Inspections

During each refueling outage an inspection shall be performed of snubbers attached to sections of safety systems piping that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems. In addition to satisfying the visual inspection acceptance criteria, freedom of motion of mechanical snubbers shall be verified using one of the following: (i) manually induced snubber movement; (ii) evaluation of in-place snubber piston setting; (iii) stroking the mechanical snubber through its full range of travel.

SEP 24 1985