# ATTACHMENT C

# PROPOSED TECHNICAL SPECIFICATION 3/4.7.6

# SAN ONOFRE NUCLEAR GENERATING STATION

UNIT 2

8512160160 851212 PDR ADDCK 05000361 P PDR

### SURVEILLANCE REQUIREMENTS (Continued)

No. Inoperable Snubbers per Inspection Period	Subsequent Visual <u>Inspection Period</u> *#
0	18 months <u>+</u> 25%
2	$6 \text{ months } \pm 25\%$
3,4 5,6,7	124 days <u>+</u> 25% 62 days + 25%
8 or more	31 days <u>+</u> 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. <u>Visual Inspection Acceptance Criteria</u>

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.

SAN ONOFRE-UNIT 2

### 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 months before being installed in the unit.

### 1. <u>Snubber Service Life Monitoring</u>

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. <u>Transient Event Inspections</u>

An inspection shall be performed of 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. In addition to satisfying the visual inspection acceptance criteria, freedom of motion of mechanical snubbers shall be verified using one of the following: (1) manually induced snubber movement; (11) evaluation of in-place snubber piston setting; (111) stroking the mechanical snubber through its full range of travel.

SAN ONOFRE-UNIT 2

# ATTACHMENT D

# PROPOSED TECHNICAL SPECIFICATION 3/4.7.6

# SAN ONOFRE NUCLEAR GENERATING STATION

UNIT 3

#### 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. <u>Visual Inspection Acceptance Criteria</u>

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. <u>Functional Tests</u>\*

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

SAN ONOFRE-UNIT 3

<sup>\*</sup>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.

### SURVEILLANCE REQUIREMENTS (Continued)

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