

LIMITING CONDITION FOR OPERATION

SURVEILLANCE REQUIREMENT

3.6.4 Shock Suppressors (Snubbers)

Applicability

Applies to the operational status of shock suppressors (snubbers).

Objective

To assure the capability of the snubbers to:

Prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, and

Allow normal thermal motion during startup and shutdown.

4.6.4 Shock Suppressors (Snubbers)

Applicability

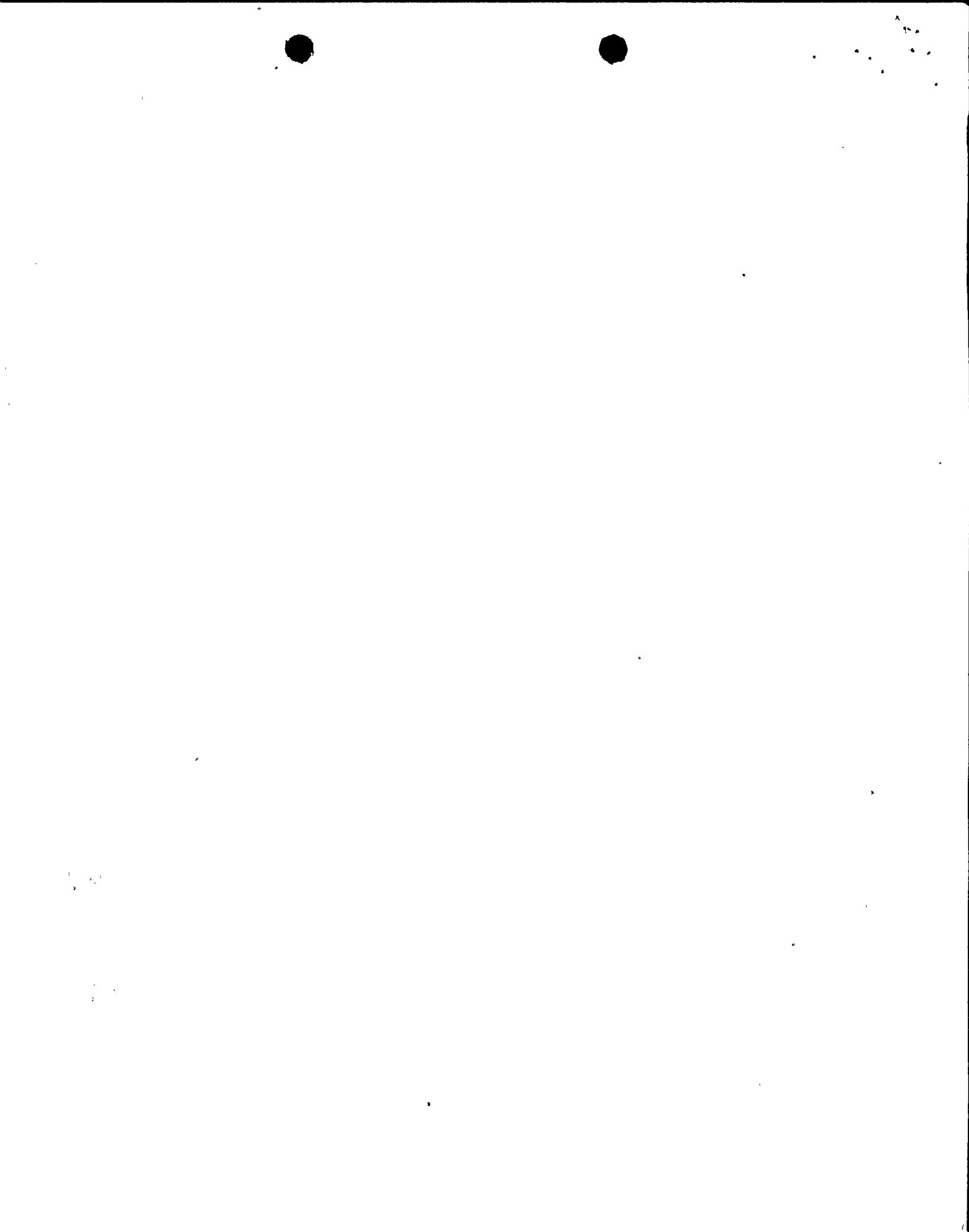
Applies to the periodic testing requirement for shock suppressors (snubbers).

Objective

To assure the operability of the snubbers to perform their intended functions.

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LIMITING CONDITION FOR OPERATION

SURVEILLANCE REQUIREMENT

Specification

- a. During all modes of operation except Cold Shutdown and Refuel, snubbers shall be operable except as noted in 3.6.4.b through 3.6.4.d below.
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.
- b. From and after the time that a snubber is determined to be inoperable, continued reactor operation is permissible only during the succeeding 72 hours unless the snubber is sooner made operable or replaced.
- c. If the requirements of 3.6.4.a and 3.6.4.b cannot be met, an orderly shutdown shall be initiated and the reactor shall be in a cold shutdown condition within 36 hours.
- d. If a snubber is determined to be inoperable while the reactor is in shutdown or refuel mode, the snubber shall be made operable or replaced prior to reactor startup.

Specification

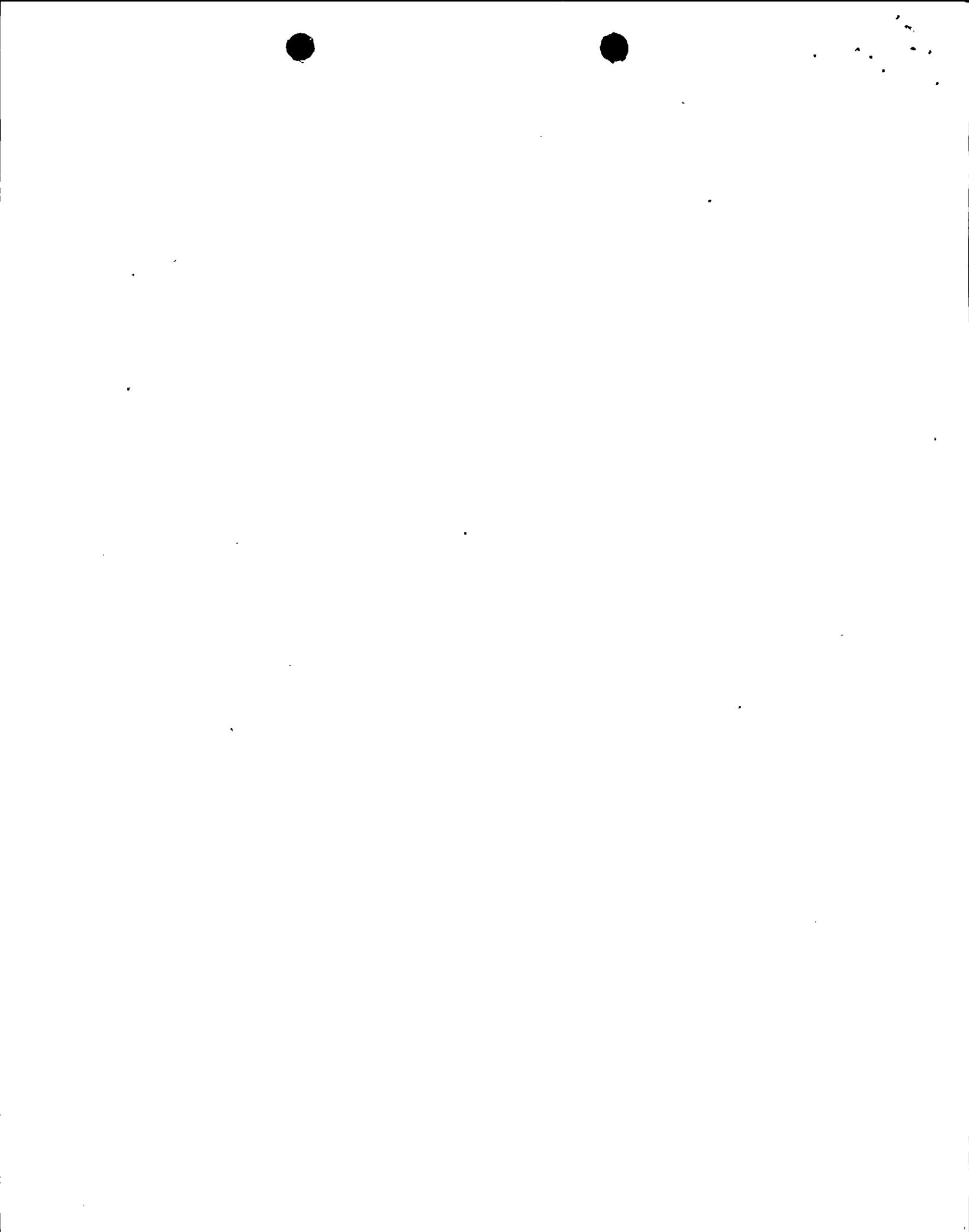
The following surveillance requirements apply to snubbers. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

a. Visual Inspection(i) Visual Inspection Frequency

Snubbers shall be visually inspected in accordance with the following schedule:

Number of Snubbers Found Inoperable During Inspection or During Inspection Interval	Next Required Inspection Interval
0	Refueling period
1	12 months \pm 25%
2	6 months \pm 25%
3,4	124 days \pm 25%
5,6,7	62 days \pm 25%
≥ 8	31 days \pm 25%

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



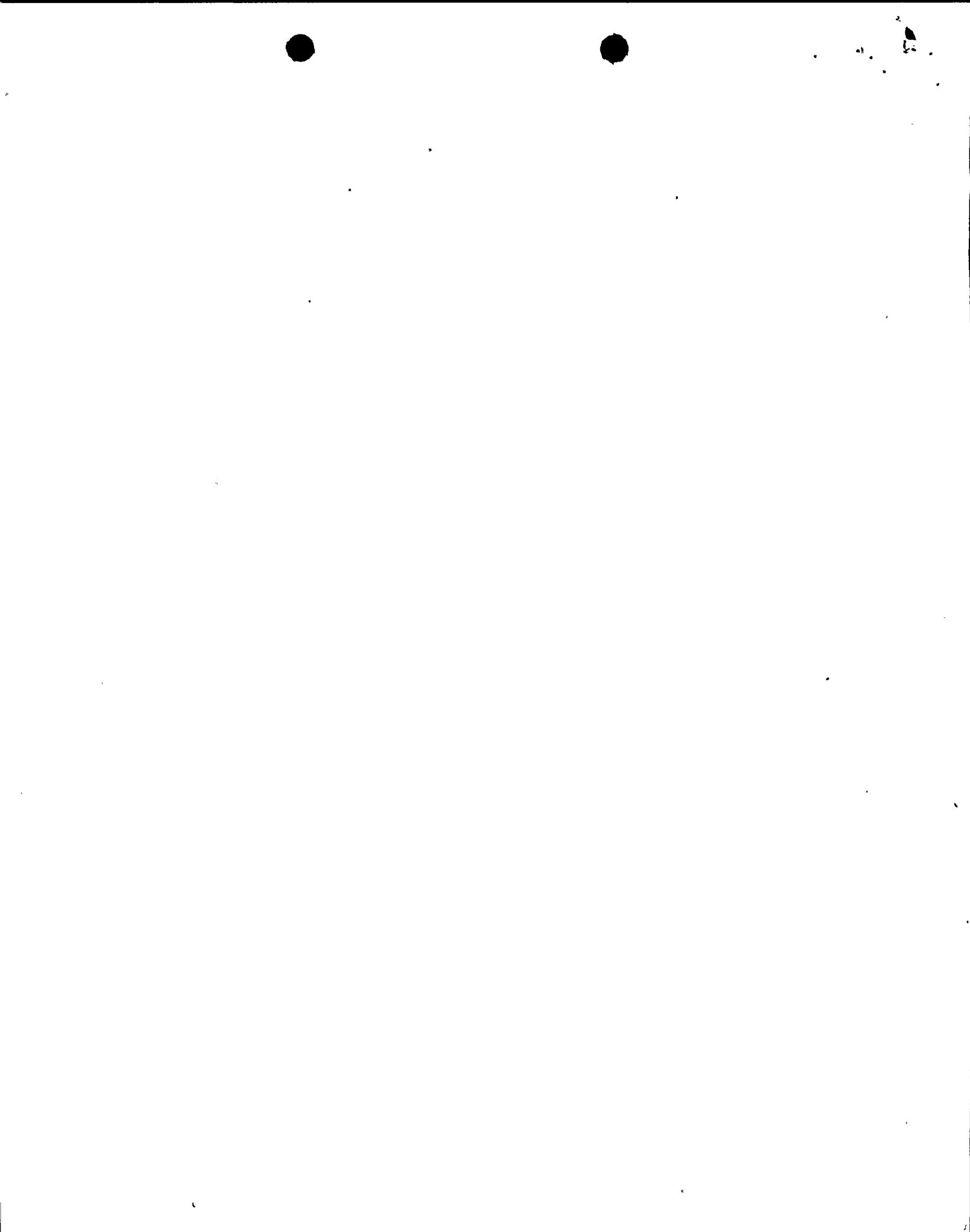
LIMITING CONDITION FOR OPERATION.

SURVEILLANCE REQUIREMENT

Snubbers may be categorized into two types (mechanical and hydraulic). These may then be classified as "accessible" or "inaccessible" based on accessibility for inspection during operation. These four groups may be inspected independently according to the above schedule.

(ii) Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired operability; (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up. Snubbers which appear inoperable as a result of visual inspections may be determined operable for the purpose of establishing the next visual inspection interval, providing 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; or (2) the affected snubber is functionally tested in the as found condition and determined operable per Specification 4.6.4.b as applicable.



LIMITING CONDITION FOR OPERATION

SURVEILLANCE REQUIREMENT

b. Functional Testing(i) Functional Test Frequency

At least once each refueling cycle, 10% of the total of each type (mechanical or hydraulic, accessible or inaccessible) of snubber in use in the plant shall be functionally tested either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria of 4.6.4b(ii) an additional 10% of that type of snubber shall be functionally tested.

(ii) Functional Test Acceptance Requirement

Hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved. This includes freedom of movement and lock-up.

Mechanical snubber functional test shall verify that:

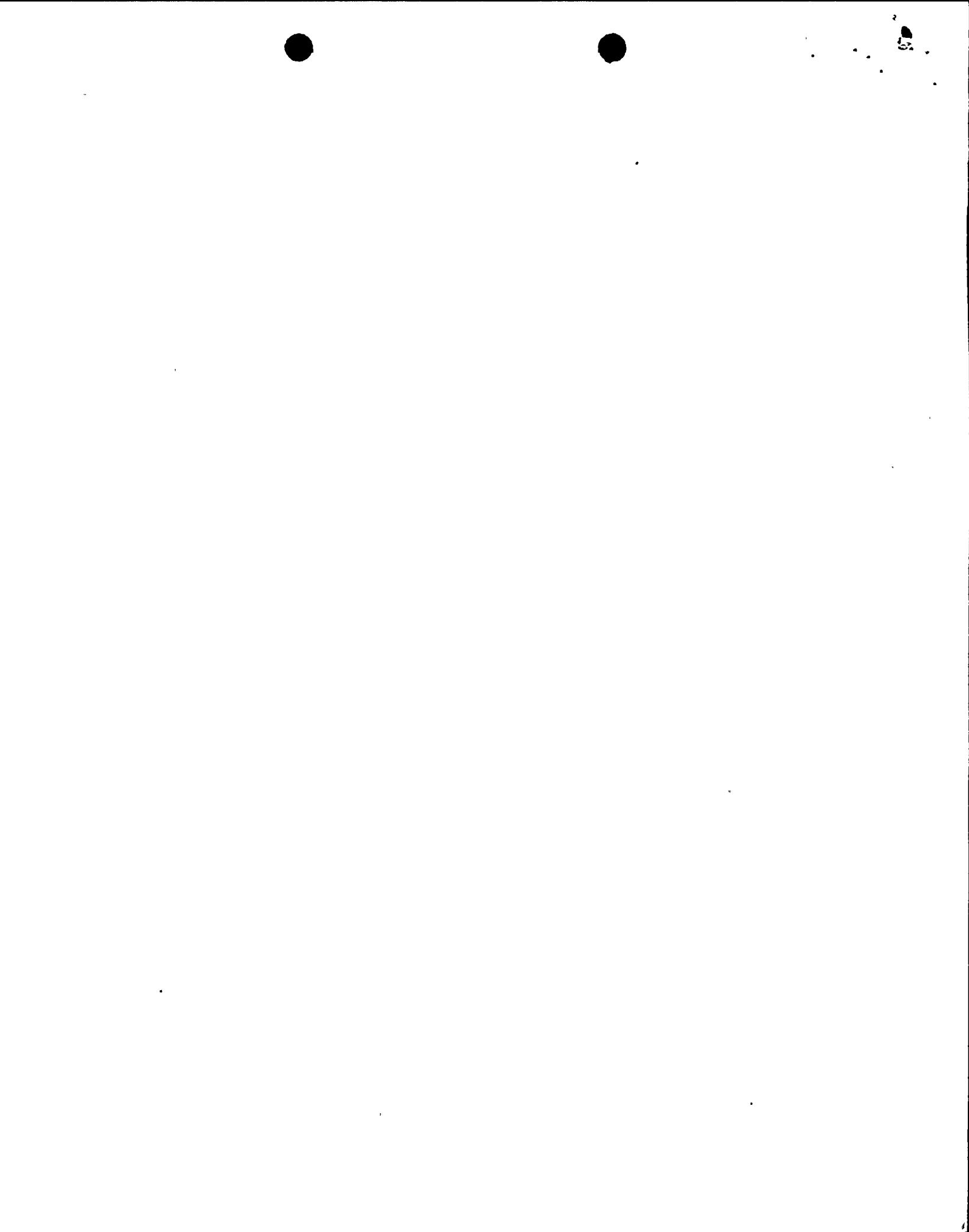
1. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force.



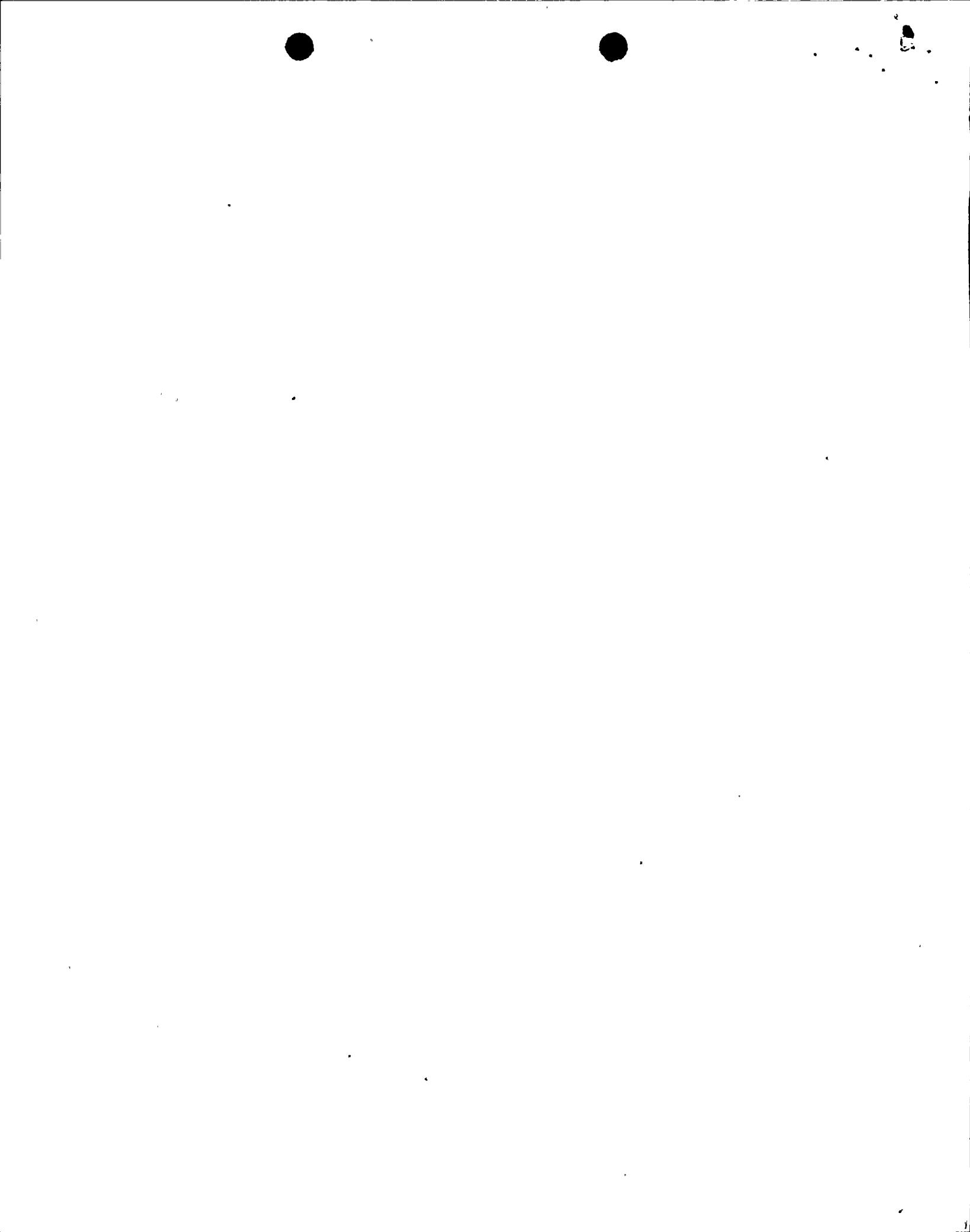
LIMITING CONDITION FOR OPERATION

SURVEILLANCE REQUIREMENT

2. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

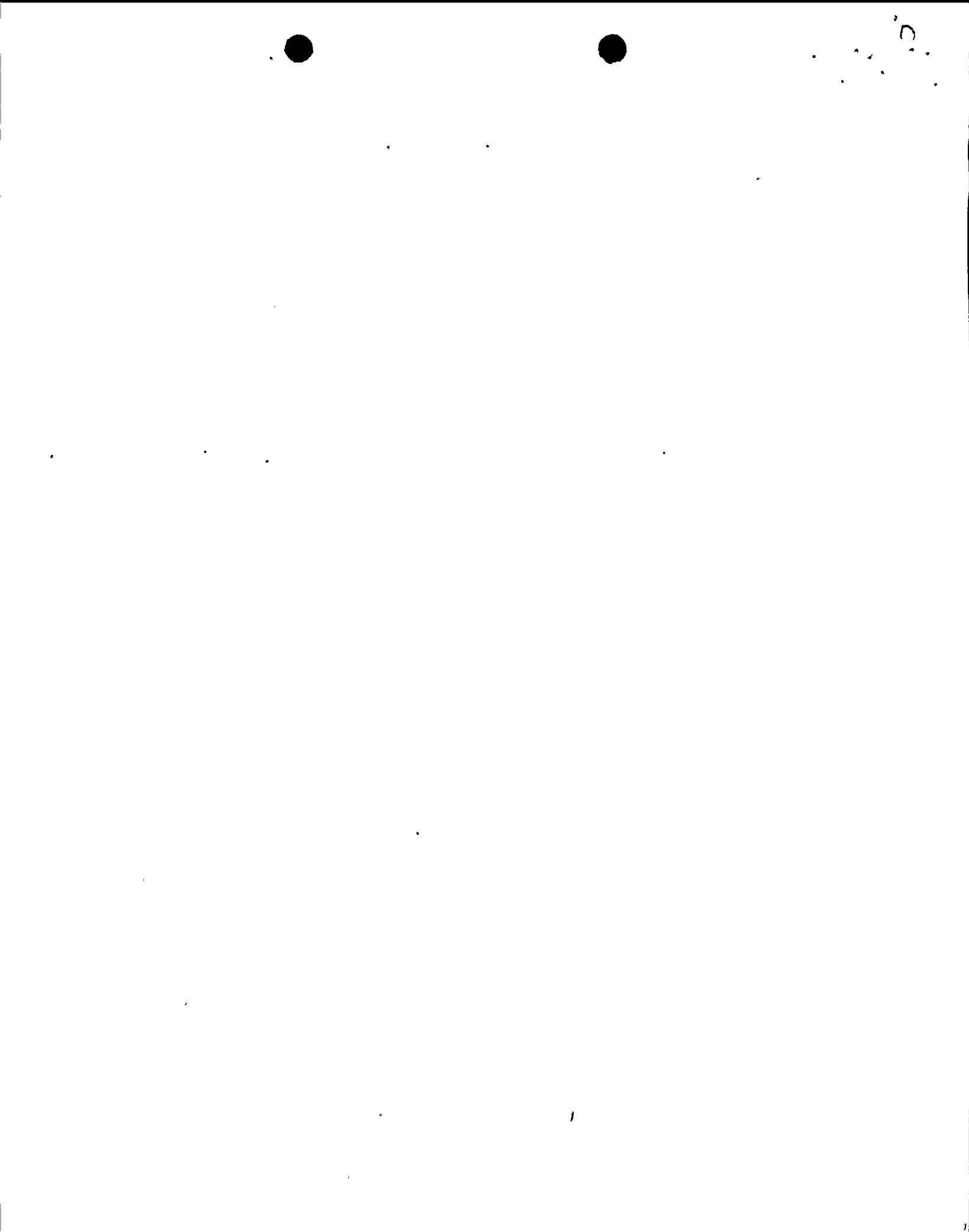


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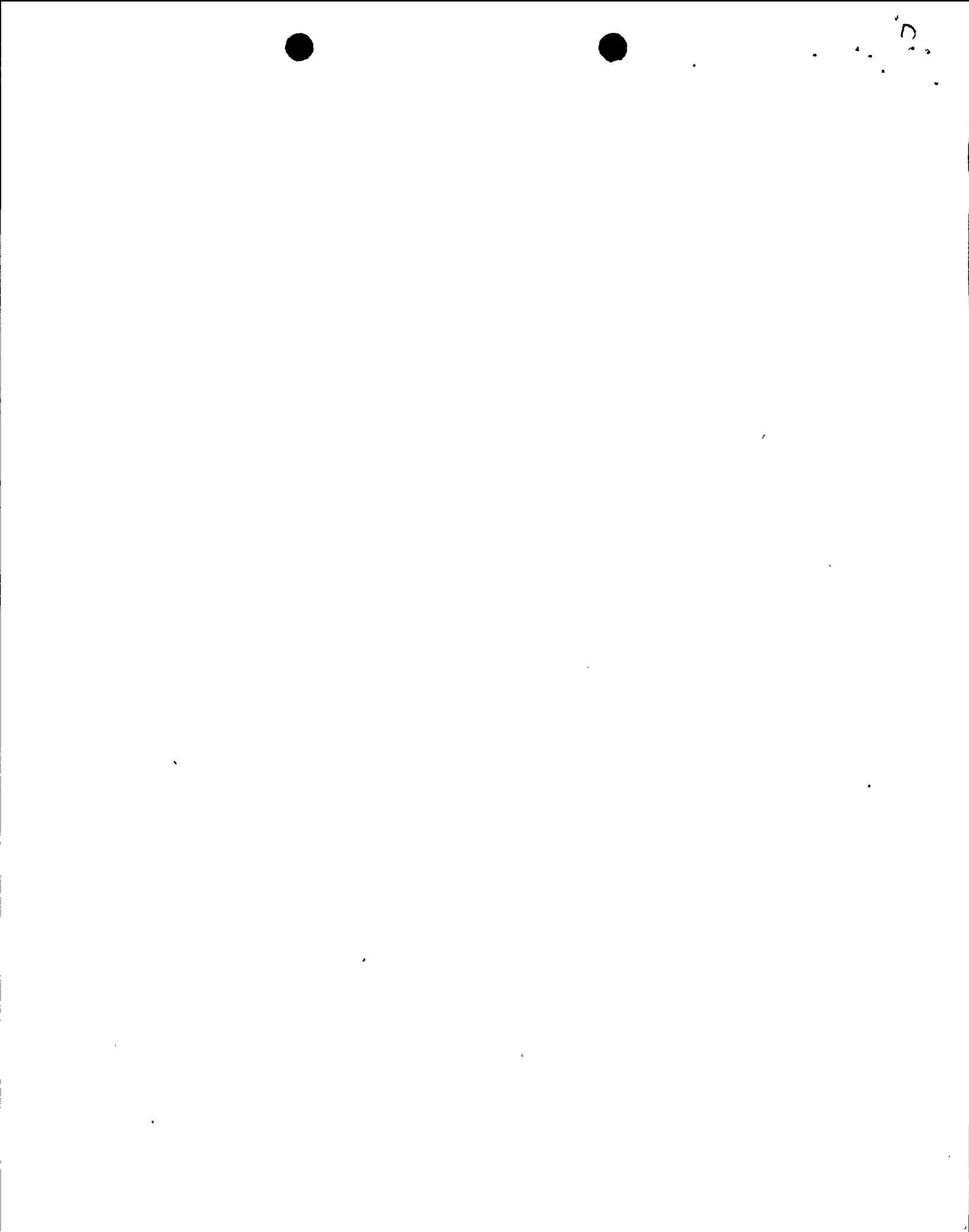
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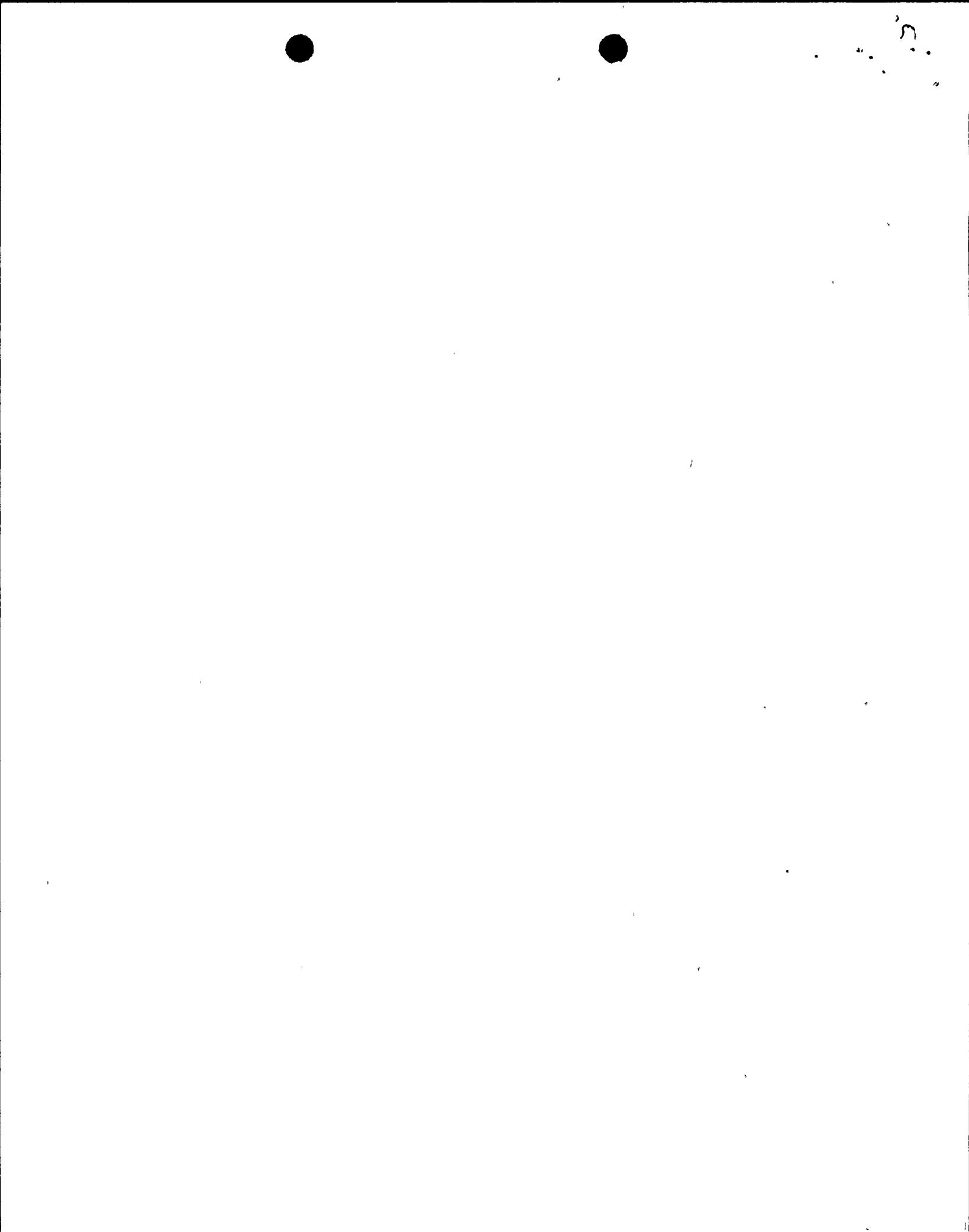


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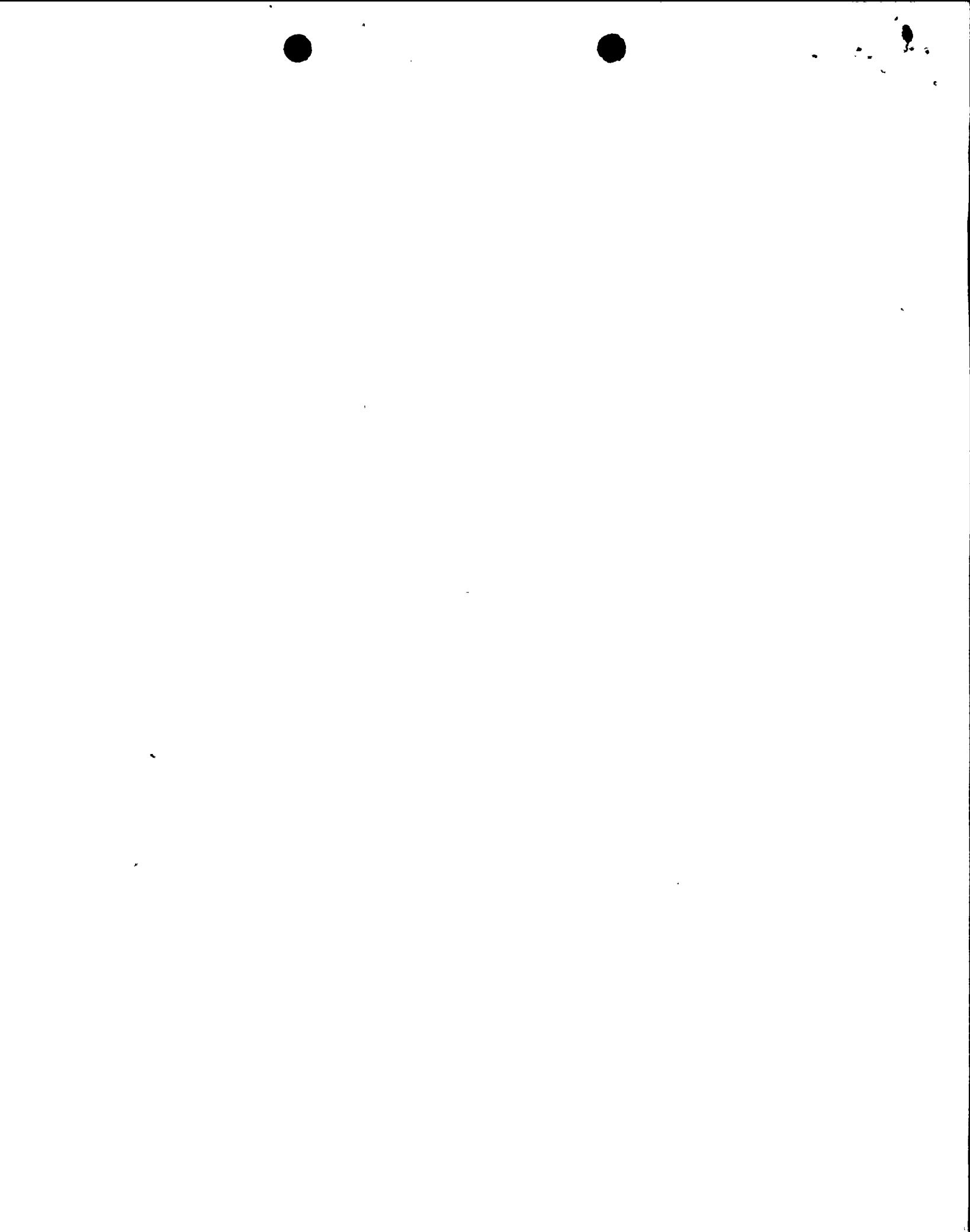


BASES FOR 3.6.4 and 4:6:4 SHOCK SUPPRESSORS (SNUBBERS)

Snubbers are required to be operable to ensure that the structural integrity of the reactor coolant system and other safety related systems is maintained during and following a seismic or other event initiating dynamic loads.

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 number of 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.

Hydraulic or mechanical, accessible or inaccessible, snubbers may each be treated as a different entity for the above surveillance programs.

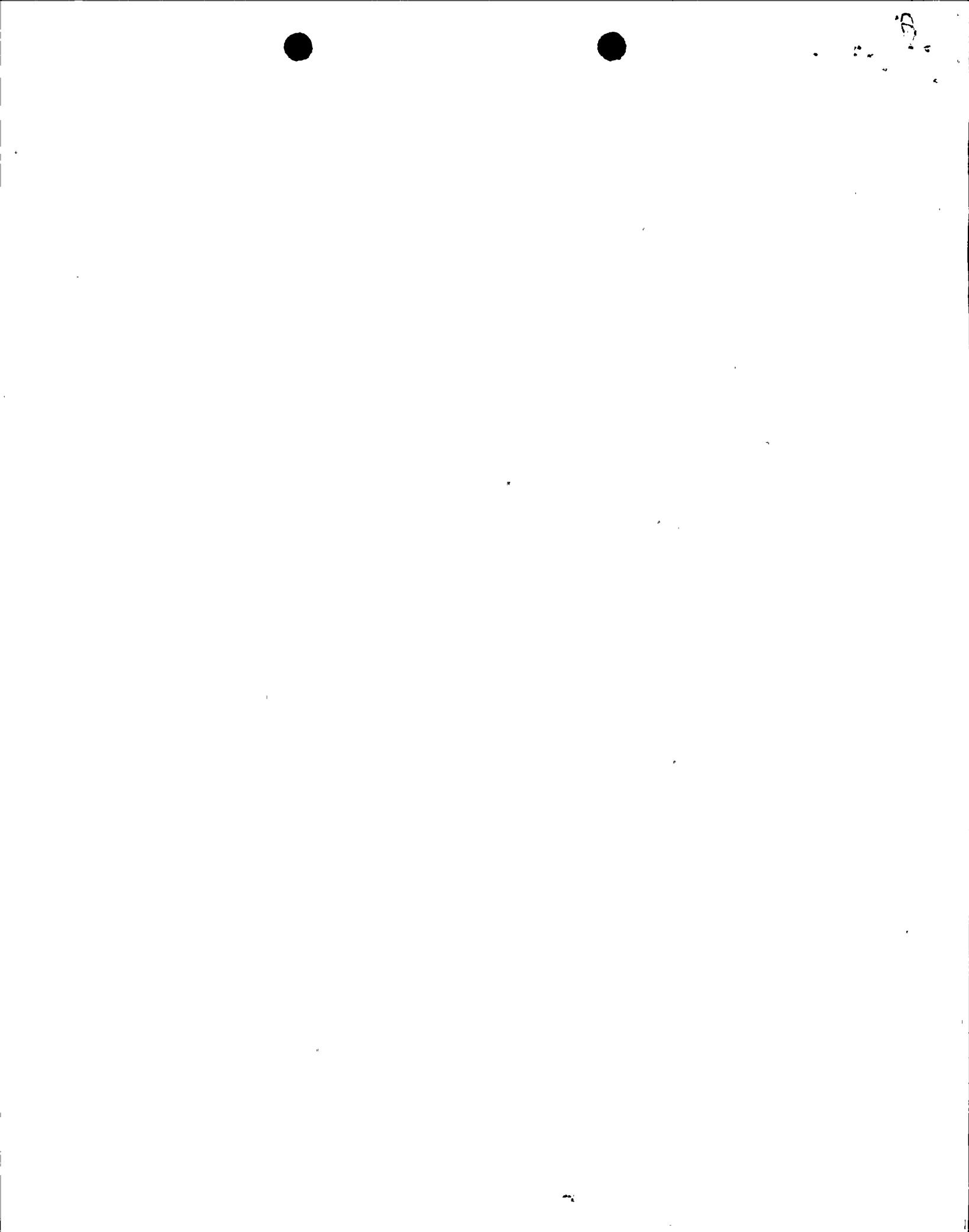


ATTACHMENT B
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DOCKET NO. 50-220

Supporting Information

Attachment A provides proposed technical specifications that meet the intent of the NRC "model" Technical Specifications transmitted by generic letter dated May 3, 1984. Differences between the model Technical Specifications and those proposed herein for Nine Mile Point Unit 1 are outlined below.

1. The requirements of Section 3.7.9 for snubbers to be operable in the refuel and shutdown mode have been deleted. This would only allow one snubber at a time to be pulled for testing. This is not practical during a refueling outage when all snubbers to be tested in the drywell are removed at once and replaced on the same schedule.
2. Section 4.7.9a of the model Technical Specifications require an initial visual examination of snubbers. This is unnecessary since it has already been performed at Nine Mile Point Unit 1. Also, the inspection interval for zero inoperable snubbers has been changed due to the 24-month operating cycle at Nine Mile Point Unit 1.
3. Section 4.7.9c requires evaluations of the cause of the snubber failures. The snubber inspection program at Nine Mile Point Unit 1 will be modified to ensure that an evaluation is completed and any subsequent action be taken based on the outcome of this evaluation. Also, this program includes criteria for selecting a representative sample.
4. Section 4.7.9.d.2 and e.3 of the model technical specification's requires bleed rate testing for hydraulic snubbers and release rate for mechanical snubbers. These requirements are not necessary since the original piping analysis assumes 1) the snubber acts as a rigid restraint during a seismic event and 2) the snubber allows the pipe to move freely during normal operation.
5. The requirements of Section 4.7.9f have been deleted. Requirements for service life monitoring will be included in the Nine Mile Point Unit 1 snubber inspection program.



ATTACHMENT C
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No Significant Hazards Considerations Analysis

The proposed Technical Specifications changes to the Nine Mile Point Unit 1 Snubber Testing Program involve no significant hazard considerations. Therefore, the operation of Nine Mile Point Unit 1 in accordance with the proposed amendment will 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. This determination is based on the following analysis.

The proposed amendment revises the Nine Mile Point Unt 1 Snubber Testing Program using Generic Letter 84-13 as guidance. These changes are minor in nature in that they are changes which keep facility operations within regulations. The proposed no significant hazards considerations determination stated above is supported by the fact that the requested changes correspond to example (vii) the Sholly Rule published in the Federal Register on April 6, 1983.

