

LIMITING CONDITION FOR OPERATION

Specification

- a. During all reactor operating conditions, except cold shutdown, snubbers shall be operable on those systems required to be operable during that particular operating condition except as noted in 3.6.4.b, c and 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. With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to the operable status or perform an engineering evaluation to determine that the components supported by the snubber(s) were not adversely affected by the inoperability of the snubber(s), i.e. the snubber(s) is (are) not required for system operability.

- c. If after 72 hours the actions as described in Section 3.6.4.b. have not been completed, the supported system shall be declared inoperable and the appropriate action statement for that system will be followed.

SURVEILLANCE REQUIREMENT

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 or more	31 days $\pm$ 25%

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

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1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is essential for the proper management of the organization's finances and for ensuring compliance with applicable laws and regulations.

2. The second part of the document outlines the specific procedures that must be followed when recording transactions. This includes the requirement that all entries be supported by appropriate documentation, such as invoices, receipts, and contracts.

3. The third part of the document addresses the issue of internal controls. It states that the organization must implement a system of internal controls that is designed to prevent and detect errors and fraud. This system should be reviewed and updated regularly to ensure its effectiveness.

4. The fourth part of the document discusses the role of the internal audit function. It states that the internal audit function should be independent and objective, and should report directly to the board of directors or the audit committee. The internal audit function should be responsible for assessing the organization's internal controls and providing recommendations for improvement.

5. The fifth part of the document discusses the importance of transparency and accountability. It states that the organization should be open and honest in its financial reporting, and should provide timely and accurate information to all stakeholders. This is essential for building trust and confidence in the organization.

6. The sixth part of the document discusses the importance of ethical behavior. It states that all employees of the organization should be held to the highest standards of ethical conduct, and should be encouraged to report any suspected wrongdoing to the appropriate authorities.

7. The seventh part of the document discusses the importance of ongoing monitoring and evaluation. It states that the organization should regularly monitor and evaluate its internal controls and financial reporting processes, and should take prompt action to address any deficiencies that are identified.

8. The eighth part of the document discusses the importance of training and education. It states that all employees of the organization should receive regular training and education on internal controls, financial reporting, and ethical behavior. This is essential for ensuring that all employees are aware of their responsibilities and are equipped with the skills and knowledge needed to perform their duties effectively.

9. The ninth part of the document discusses the importance of communication. It states that the organization should maintain open and effective communication with all stakeholders, and should provide timely and accurate information on its financial performance and internal controls. This is essential for building trust and confidence in the organization.

10. The tenth part of the document discusses the importance of documentation. It states that all internal controls, financial reporting processes, and ethical behavior policies should be documented in writing, and should be readily accessible to all employees. This is essential for ensuring that the organization's internal controls and financial reporting processes are consistent and effective.

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- d. If the actions described in 3.6.4.b or c resulted in replacement or restoration to the operable status of the effected snubber(s), perform an engineering evaluation to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubber.

## 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 within the specified range of velocity.
2. Freedom of movement exists in both tension and compression.

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.

