ATTACHMENT B

Proposed Change to Appendix A

Technical Specifications

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3.6 LIMITING CONDITION FOR OPERATION

I. Snubbers (Shock Suppressors)

1. During all modes of operation except cold shutdown and refuel, all safety-related snubbers listed in Table 3.6.1 shall be operable except as noted in Specification 3.6.I.2 through 3.6.I.4.

2. From and after the time 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.

3. If the requirements of 3.6.I.1 and 3.6.I.2 cannot be met, an orderly shutdown shall be initiated and the reactor shall be in cold shutdown or refuel condition within 36 hours.

4. If a snubber is determined to be inoperable while the reactor is in the cold shutdown or refuel mode, the snubber shall be made operable or replaced prior to refuel startup.

5. Snubbers may be added to safety-related systems without prior license amendment to Table 3.6.1 provided that a revision to Table 3.6.1 is included with the next license amendment request.

4.6 SURVEILLANCE REQUIREMENTS

I. Snubbers (Shock Suppressors)

The following surveillance requirements apply to safety-related snubbers listed in Table 3.6.1.

1. Visual Inspection

An independent visual inspection shall be performed on the safety-related hydraulic and mechanical snubbers contained in Table 3.6.1 in accordance with the schedule below:

a. All hydraulic snubbers whose seal material has been demonstrated by operating experience, lab testing or analysis to be compatible with the operating environment shall be visually inspected. This inspection shall include, but not necessarily be limited to, inspection of the hydraulic fluid reservoir, fluid connections, and linkage connection to the piping and anchor to verify snubber operability.

b. All mechanical snubbers shall be visually inspected. This inspection shall consist of, but not necessarily be limited to, inspection of the snubber and attachments to the piping and anchor for indications of damage or impaired operability.

No. of Snubbers Found Inoperable During Inspection Interval	Next Required Inspection Interval
0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3, 4	124 days ± 25%
5, 6, 7	62 days ± 25%
≥8	31 days ± 25%

...e required inspection interval shall not be len... ...ened more than one step at a time.

Snubbers may be categorized in two groups, "accessible" or "inaccessible," based on their accessibility for inspection during reactor operation. These two groups may be inspected independently according to the above schedule.

2. Functional Testing

a. Once each refueling cycle, a representative sample of approximately 10% of the hydraulic snubbers contained in Table 3.6.1 shall be functionally tested for operability, including:

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

(ii) Snubber bleed, or release rate, where required, is within the specified range in compression or tension.

For each unit and subsequent unit found inoperable, an additional 10% of the hydraulic snubbers shall be tested until no more failures are found or all units have been tested.

b. Once each refueling cycle, a representative sample of approximately 10% of the mechanical snubbers contained in Table 3.6.1 shall be functionally tested for operability. The test shall consist of two parts:

(i) Verification that the force that initiates free movement of the snubber in either tension or compression is less than the specified maximum breakaway friction force.

(ii) Verify that the activation (restraining action) is achieved within the specified range of acceleration or velocity, as applicable based on snubber design in both tension and compression.

TABLE 3.6.1

SAFETY RELATED SNUBBERS*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH/ LOCATION	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
1	Drywell Recirc. Motor 2B-202	524'	328°	X	X	
2	Drywell Recirc. Motor 2B-202	524'	302°	X	X	
3	Drywell Recirc. Motor 2B-202	524'	315°	X	X	
4	Drywell Recirc. Motor 2A-202	524'	148°	X	X	
5	Drywell Recirc. Motor 2A-202	524'	122°	X	X	
6	Drywell Recirc. Motor 2A-202	524'	135°	X	X	
7	Drywell Recirc. Pump 2B-202	512'	326°	X	X	
8	Drywell Recirc. Pump 2B-202	512'	304°	X	X	
9	Drywell Recirc. Pump 2B-202	517'	315°	X	X	
10	Drywell Recirc. Pump 2A-202	512'	124°	X	X	
11	Drywell Recirc. Pump 2A-202	512'	146°	X	X	
12	Drywell Recirc. Pump 2A-202	507'	135°	X	X	
13-16	Removed					
17	Drywell Recirc Header 201B-22"	533'6"	195°	X	X	
18-20	Removed					
21	Drywell Recirc Header 201A-22"	533'6"	22°	X	X	
22-23	Removed					
24	Drywell Feedwater Line 3204D-12"	538'	108°	X	X	
25-29	Removed					
30	Drywell Core Spray Line 1403-10"	575'	336°	X	X	
31	Drywell Core Spray Line 1404-10"	562'	231°	X	X	
32	Drywell Target Rock Valve 203-3A	542'6"	16°	X	X	
33	Drywell Target Rock Valve 203-3A	542'4"	31°	X	X	
34	Drywell Target Rock Valve 203-3A	540'0"	19°	X	X	
35	Removed					
36	Drywell Recirc. Line 201B-20"	518'	270°	X	X	

*Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license Amendment request.

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TABLE 3.6.1 (Continued)

SAFETY RELATED SNUBBERS*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH/ LOCATION	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
37	Drywell Recirc. Line 201A-28"	518'	90°	X	X	
38	Drywell Shutdown Cooling Line 1001A-16"	523'	0°	X	X	
39	Drywell Rx Water Cleanup Line 1201-8"	533'	316°	X	X	
40	Drywell Rx Water Cleanup Line 1201-8"	533'	301°	X	X	
41	Drywell Main Steam Line 1001B-20"	534'	28°	X	X	
42	Drywell Main Steam Line 1001A-20"	536'	14°	X	X	
43	Drywell Main Steam Line 1001D-20"	536'	346°	X	X	
44	Drywell Main Steam Line 1001C-20"	536'	332°	X	X	
45	Drywell Main Steam Line 1001B-20"	545'	105°	X	X	
46	Drywell Main Steam Line 1001B-20"	543'	105°	X	X	
47	Drywell Main Steam Line 1001A-20"	542'	73°	X	X	
48	Drywell Main Steam Line 1001A-20"	543'6"	73°	X	X	
49	Drywell Main Steam Line 1001A-20"	539'	20°	X	X	
50	Drywell Main Steam Line 1001C-20"	543'6"	195°	X	X	
51	Drywell Main Steam Line 1001C-20"	542'	195°	X	X	
52	Drywell Main Steam Line 1001D-20"	543'	343°	X	X	
53	Drywell Main Steam Line 1001D-20"	544'	343°	X	X	

*Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license amendment request.

TABLE 3.6.1 (CONTINUED)

SAFETY RELATED SNUBBERS*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH/ LOCATION	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
	West Accumulator Bank Area:					
301	Control Rod Drive Line 0320A-4"	528'				X
**	Isolation Condenser Pipeway Room:					
1301	Isolation Condenser Line 1303-12"**	558'	180°	X		X
1302	Isolation Condenser Line 1303-12"**	568'	180°	X		X
1303	Isolation Condenser Line 1302-14"**	580'	195°	X		X
1304	Isolation Condenser Line 1303-12"	591'	N.W. Corner Iso Cond.			X
1401	Core Spray Discharge Line 1404-12"	513'	130°			X
1402	Core Spray Discharge Line 1404-12"	513'	130°			X
1403	Core Spray Discharge Line 1404-12"	508'	200°			X
1404	Core Spray Discharge Line 1404-12"	508'	200°			X

*Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license amendment request.

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TABLE 3.6.1

SAFETY RELATED SNUBBERS*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH/ LOCATION	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
1501	Torus Ring Header 1501-24"	483'	83°			X
1502	Torus Ring Header 1501-24"	483'	74°			X
1503	Torus Ring Header 1501-24"	483'	38°			X
1504	Torus Ring Header 1501-24"	483'	29°			X
1505	Torus Ring Header 1501-24"	483'	331°			X
1506	Torus Ring Header 1501-24"	483'	322°			X
1507	Torus Ring Header 1501-24"	483'	286°			X
1508	Torus Ring Header 1501-24"	483'	277°			X
1509	Torus Ring Header 1501-24"	483'	218°			X
1510	Torus Ring Header 1501-24"	483'	209°			X
1511	Torus Ring Header 1501-24"	483'	151°			X
1512	Torus Ring Header 1501-24"	483'	142°			X
1513	Torus Ring Header 1501-24"	483'	112°			X
1514	Torus Ring Header 1501-24"	483'	168°			X
1515	Torus Ring Header 1501-24"	483'	192°			X
1516	Torus Ring Header 1501-24"	483'	250°			X

* Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license amendment request.

Amendment No. ~~70~~

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TABLE 3.6.1

SAFETY RELATED SNUBBERS*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH/ LOCATION	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
1517	Torus Ring Header 1501-24"	483'	292°			X
1518	Torus Ring Header 1501-24"	483'	340°			X
1519	Torus Ring Header 1501-24"	483'	22°			X
1520	Torus Ring Header 1501-24"	483'	60°			X
1521	LPCI Discharge Line 1517-14"	510'	130°			X
1522	LPCI Discharge Line 1517-14"	510'	130°			X
1523	LPCI Discharge Line 1522-14"	510'	240°			X
1524	LPCI Discharge Line 1522-14"	510'	240°			X
1525	LPCI Discharge Line 1504-16"	515'	130°			X
1526	LPCI Discharge Line 1504-16"	504'	130°			X
1527	LPCI Discharge Line 1504-10"	527'	130°			X
1528	LPCI Discharge Line 1519-18"	504'	240°			X
1529	LPCI Discharge Line 1521-6"	509'	240°			X
1530	LPCI Discharge Line 1518-3/4"	511'	240°			X
1531	LPCI Discharge Line 1520-3/4"	510'	240°			X

*Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license amendment request.

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TABLE 3.6.1

SAFETY RELATED SNUBBERS*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH/ LOCATION	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
1601	Vacuum Relief Line 1601-20"	511'	270°			X
1602	Vacuum Relief Line 1601-20"	511'	270°			X
1603	Vacuum Relief Line 1601-20"	512'	270°			X
1604	Torus Drain Line 1638A-½"	477'	90°			X
2301	HPCI Line 2305-10"	510'	HPCI Steam Rm.			X
2302	HPCI Line 2320-3"	531'	Near MCC Panel 29-4			X
8501	N_2 Inerting Line 8506-18"	514'	270°			X

*Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license amendment request.

Amendment No.

9le-4

The inspection frequency is based upon maintaining a constant level of snubber protection. Thus, the required inspection interval varies inversely with the observed snubber failures. The number of inoperable snubbers found during a required inspection determines the time interval for the next required 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 require 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.

To further increase the assurance of snubber reliability, functional tests will be performed once each refueling cycle. A representative sample of 10% of the safety-related snubbers will be functionally tested. Observed failures on these samples will require testing of additional unit.

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

Hydraulic snubber testing will include stroking of the snubbers to verify piston movement, lock-up, and bleed. Functional testing of the mechanical snubbers will consist of verification that the force that initiates free movement of the snubber in either tension or compression is less than the maximum breakaway friction force and verification that the activation (restraining action) is achieved within the specified range of acceleration or velocity, as applicable based on snubber design, in both tension and compression.

When the cause of rejection of the snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

Monitoring of snubber service life shall consist of the existing station record systems, including the central filing system, maintenance files, safety-related work packages, and snubber inspection records. The record retention programs employed at the station shall allow station personnel to maintain snubber integrity. The service life for hydraulic snubbers is 10 years. The hydraulic snubbers existing locations do not impose undue safety implications on the piping and components because they are not exposed to excesses in environmental conditions. The service life for mechanical snubbers is 40 years, lifetime of the plant. The mechanical snubbers are installed in areas of harsh environmental conditions because of their dependability over hydraulic snubbers in these areas. All snubber installations have been thoroughly engineered providing the necessary safety requirements. Evaluations of all snubber locations and environmental conditions justify the above conservative snubber service lives.

3.6 LIMITING CONDITION FOR OPERATION

I. Snubbers (Shock Suppressors)

1. During all modes of operation except cold shutdown and refuel, all safety-related snubbers listed in Table 3.6.1 shall be operable except as noted in Specification 3.6.I.2 through 3.6.I.4.

2. From and after the time 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.

3. If the requirements of 3.6.I.1 and 3.6.I.2 cannot be met, an orderly shutdown shall be initiated and the reactor shall be in cold shutdown or refuel condition within 36 hours.

4. If a snubber is determined to be inoperable while the reactor is in the cold shutdown or refuel mode, the snubber shall be made operable or replaced prior to refuel startup.

5. Snubbers may be added to safety-related systems without prior license amendment to Table 3.6.1 provided that a revision to Table 3.6.1 is included with the next license amendment request.

4.6 SURVEILLANCE REQUIREMENTS

I. Snubbers (Shock Suppressors)

The following surveillance requirements apply to safety-related snubbers listed in Table 3.6.1.

1. Visual Inspection

An independent visual inspection shall be performed on the safety-related hydraulic and mechanical snubbers contained in Table 3.6.1 in accordance with the schedule below:

a. All hydraulic snubbers whose seal material has been demonstrated by operating experience, lab testing or analysis to be compatible with the operating environment shall be visually inspected. This inspection shall include, but not necessarily be limited to, inspection of the hydraulic fluid reservoir, fluid connections, and linkage connection to the piping and anchor to verify snubber operability.

b. All mechanical snubbers shall be visually inspected. This inspection shall consist of, but not necessarily be limited to, inspection of the snubber and attachments to the piping and anchor for indications of damage or impaired operability.

No. of Snubbers Found Inoperable During Inspection Interval	Next Required Inspection Interval
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%
$\geq$ 8	31 days $\pm$ 25%

...e required inspection interval shall not be len... ...ened more than one step at a time.

Snubbers may be categorized in two groups, "accessible" or "inaccessible," based on their accessibility for inspection during reactor operation. These two groups may be inspected independently according to the above schedule.

2. Functional Testing

a. Once each refueling cycle, a representative sample of approximately 10% of the hydraulic snubbers contained in Table 3.6.1 shall be functionally tested for operability, including:

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

(ii) Snubber bleed, or release rate, where required is within the specified range in compression or tension.

For each unit and subsequent unit found inoperable, an additional 10% of the hydraulic snubbers shall be tested until no more failures are found or all units have been tested.

b. Once each refueling cycle, a representative sample of approximately 10% of the mechanical snubbers contained in Table 3.6.1 shall be functionally tested for operability. The test shall consist of two parts:

(i) Verification that the force that initiates free movement of the snubber in either tension or compression is less than the specified maximum breakaway friction force.

(ii) Verify that the activation (restraining action) is achieved within the specified range of acceleration or velocity, as applicable based on snubber design in both tension and compression.

Table 3.6.1

SAFETY RELATED SNUBBERS*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH/ LOCATION	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
1	Drywell Recirc. Motor 3B-202	524'	328°	X	X	
2	Drywell Recirc. Motor 3B-202	524'	302°	X	X	
3	Drywell Recirc. Motor 3B-202	524'	315°	X	X	
4	Drywell Recirc. Motor 3A-202	524'	148°	X	X	
5	Drywell Recirc. Motor 3A-202	524'	122°	X	X	
6	Drywell Recirc. Motor 3A-202	524'	135°	X	X	
7	Drywell Recirc. Pump 3B-202	512'	326°	X	X	
8	Drywell Recirc. Pump 3B-202	512'	304°	X	X	
9	Drywell Recirc. Pump 3B-202	507'	315°	X	X	
10	Drywell Recirc. Pump 3A-202	512'	124°	X	X	
11	Drywell Recirc. Pump 3A-202	512'	146°	X	X	
12	Drywell Recirc. Pump 3A-202	507'	135°	X	X	
13 & 14	Removed					
15	Drywell LPCI Line 1506-16"	513'	256°	X	X	
16	Drywell LPCI Line 1519-16"	513	95°	X	X	
17 & 20	Removed					
21	Drywell Recirc. Header 201A-22"	533'6"	22°	X	X	
22	Drywell HPCI Line 2305-10"	550'	121°	X	X	
23	Drywell Cleanup Line 1201-8"	537'-6"	84°	X	X	
24	Removed					
25	Drywell Cleanup Line 1201-8"	537'6"	78°	X	X	
26	Removed					
27	Drywell Cleanup Line 1201-8"	538'6"	60°	X	X	
28	Removed					
29	Drywell Core Spray Line 1404-10"	573'	231°	X	X	
30	Drywell Core Spray Line 1403-10"	561'	336°	X	X	
31	Drywell HPCI Line 2305-10"	563'	140°	X	X	

* Modifications to this table, due to changes in high radiation, should be submitted to the NRC as part of next license amendment request.

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Table 3.6,1 (Continued)

SAFETY RELATED / SNUBBER*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH/ LOCATION	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORM/ OPERATION
32	Drywell Target Rock Valve 203-3A	542'6"	14°	X	X	
33	Drywell Target Rock Valve 203-3A	542'2"	31°	X	X	
34	Drywell Target Rock Valve 203-3A	540'	19°	X	X	
35	Removed					
36	Drywell Recirc. Line 3-201B-22"	532'6"	183°	X	X	
37	Drywell Feedwater Line 3-3204D-12"	537'	110°	X	X	
38	Drywell Feedwater Line 3-3204E-12'	538'6"	260°	X	X	
41	Drywell Main Steam Line 3-3001B-20"	534'9"	28°	X	X	
42	Drywell Main Steam Line 3-3001A-20"	534'8"	14°	X	X	
43	Drywell Main Steam Line 3-3001C-20"	534'8"	332°	X	X	
44	Drywell Main Steam Line 3-3001B-20"	542'8"	112°	X	X	
45	Drywell Main Steam Line 3-3001B-20"	543'6"	100°	X	X	
46	Drywell Main Steam Line 3-3001A-20"	543'6"	75°	X	X	
47	Drywell Main Steam Line 3-3001A-20"	544'1"	75°	X	X	
48	Drywell Main Steam Line 3-3001D-20"	542'8"	285°	X	X	
49	Drywell Main Steam Line 3-3001-D-20"	543'6"	285°	X	X	
50	Drywell Main Steam Line 3-3001C-20"	543'6"	255°	X	X	
51	Drywell Main Steam Line 3-3001C-20"	543'6"	255°	X	X	

* Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license amendment request.

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TABLE 3.6.1 (Cont'd)

SAFETY RELATED SNUBBERS*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH/ LOCATION	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
	West Accumulator Bank Area:					
401	Scram Disch. Vol. Line 0410B-2"	527'				X
402	Scram Disch. Vol. Line 0410B-2"	531'				X
403	Scram Disch. Vol. Line 0404B-1"	536'				X
404	Scram Disch. Vol. Line 0404B-1"	536'				X
405	Scram Disch. Vol. Line 0404B-1"	536'				X
406	Scram Disch. Vol. Line 0404B-1"	536'				X
407	Scram Disch. Vol. Line 0404B-1"	536'				X
	East Accumulator Bank Area:					
408	Scram Disch. Vol. Line 0408A-6"	536'				X
409	Scram Disch. Vol. Line 0410A-2"	535'				X
410	Scram Disch. Vol. Line 0408A-6"	535'				X
411	Scram Disch. Vol. Line 0404A-1"	535'				X
412	Scram Disch. Vol. Line 0404A-1"	535'				X
413	Scram Disch. Vol. Line 0404A-1"	530'				X
414	Scram Disch. Vol. Line 0404A-1"	537'				X
415	Scram Disch. Vol. Line 0404A-1"	528'				X

*Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license amendment request.

TABLE 3.6.1 (Cont'd)

SAFETY RELATED SNUBBERS*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH/ LOCATION	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
	Isolation Condenser Pipeway Room:					
1301	Isolation Condenser Line 1303-12"	558'	180°	X		X
1302	Isolation Condenser Line 1303-12"	568'	180°	X		X
1303	REMOVED					
1401	Core Spray Discharge Line 1406-8"	512'	240°			X
1402	Core Spray Discharge Line 1406-8"	512'	240°			X
1501	Torus Ring Header 1501-24"	483'	83°			X
1502	Torus Ring Header 1501-24"	483'	74°			X
1503	Torus Ring Header 1501-24"	483'	38°			X
1504	Torus Ring Header 1501-24"	483'	29°			X
1505	Torus Ring Header 1501-24"	483'	331°			X

* Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license amendment request.

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TABLE 3.6.1 (CONTINUED)

SAFETY RELATED SNUBBERS*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH/ LOCATION	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
1506	Torus Ring Header 1501-24"	483'	286°			X
1507	Torus Ring Header 1501-24"	483'	286°			X
1508	Torus Ring Header 1501-24"	483'	227°			X
1509	Torus Ring Header 1501-24"	483'	209°			X
1510	Torus Ring Header 1501-24"	483'	209°			X
1511	Torus Ring Header 1501-24"	483'	151°			X
1512	Torus Ring Header 1501-24"	483'	142°			X
1513	Torus Ring Header 1501-24"	483'	112°			X
1514	Torus Ring Header 1501-24"	483'	168°			X
1515	Torus Ring Header 1501-24"	483'	192°			X
1516	Torus Ring Header 1501-24"	483'	250°			X
1517	Torus Ring Header 1501-24"	483'	292°			X
1518	Torus Ring Header 1501-24"	483'	340°			X
1519	Torus Ring Header 1501-24"	483'	22°			X
1520	Torus Ring Header 1501-24"	483'	60°			X

* Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license amendment request.

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TABLE 3.6.1 (CONTINUED)

SAFETY RELATED SNUBBERS*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH/ LOCATION	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
1521	LPCI Discharge Line 1516-6"	510'	240°			X
1522	LPCI Discharge Line 1516-6"	510'	240°			X
1523	LPCI Discharge Line 1533-3"	506'	240°			X

*Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license amendment request.

The inspection frequency is based upon maintaining a constant level of snubber protection. Thus, the required inspection interval varies inversely with the observed snubber failures. The number of inoperable snubbers found during a required inspection determines the time interval for the next required 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 require 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.

To further increase the assurance of snubber reliability, functional tests will be performed once each refueling cycle. A representative sample of 10% of the safety-related snubbers will be functionally tested. Observed failures on these samples will require testing of additional unit.

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

Hydraulic snubber testing will include stroking of the snubbers to verify piston movement, lock-up, and bleed. Functional testing of the mechanical snubbers will consist of verification that the force that initiates free movement of the snubber in either tension or compression is less than the maximum breakaway friction force and verification that the activation (restraining action) is achieved within the specified range of acceleration or velocity, as applicable based on snubber design, in both tension and compression.

When the cause of rejection of the snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

Monitoring of snubber service life shall consist of the existing station record systems, including the central filing system, maintenance files, safety-related work packages, and snubber inspection records. The record retention programs employed at the station shall allow station personnel to maintain snubber integrity. The service life for hydraulic snubbers is 10 years. The hydraulic snubbers existing locations do not impose undue safety implications on the piping and components because they are not exposed to excesses in environmental conditions. The service life for mechanical snubbers is 40 years, lifetime of the plant. The mechanical snubbers are installed in areas of harsh environmental conditions because of their dependability over hydraulic snubbers in these areas. All snubber installations have been thoroughly engineered providing the necessary safety requirements. Evaluations of all snubber locations and environmental conditions justify the above conservative snubber service lives.

ATTACHMENT C

Evaluation of Significant Hazards Consideration

Description of Amendment Request

This proposed amendment request adds and deletes snubbers from the table of snubbers that require a routine surveillance. Also clarification was added that allows a testing mode for mechanical snubbers not currently in the Technical Specifications and removes reference to out-of-date LCOs concerning the Torus Ring Header Snubbers.

Basis for Proposed No Significant Hazards Consideration Determination

The Commission has provided guidance concering application of No Significant Hazards Consideration by citing examples (48 FR 14871). One such example, (ii), relates to a change that constitutes an additional limitation, restriction or control not presently including in the technical specification. Clearly the addition of snubbers to the Technical Specification, subjecting these snubbers to those surveillance requirements, falls within the domain of the example as does the inclusion of velocity testing for certain types of mechanical snubbers. Deletion of snubbers does not clearly fall with many of the examples cited by the Commission, except perhaps example (vi). However all deletions were based on analysis which demonstrated that the piping stress remained within allowable design limits and removal of these snubbers does not enroach upon margins provided by the design cycles.

Therefore, since the application for amendment involves a proposed change that is similar to an examples for which no significant hazards consideration exists; or where no specific example is available the change does not increase the probability or consequences of an accident previously evaluated; does not create the possibility of a new or different kind of accident from any previously evaluated; or does not involve a significant reduction in a margin of safety, Commonwealth Edison has made a proposed determination that the application involves no significant hazards consideration.