3/4.7.9 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.9 All snubbers listed in Tables 3.7-3a and 3.7-3b shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.

ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.9g. on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.9 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

The first inservice visual inspection of each type of snubber shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers listed in Tables 3.7-3a and 3.7-3b.** If less than two snubbers of any type are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months ± 25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

No. Inoperable Snubbers of Each Type per Inspection Period	Subsequent Visual Inspection Period*#
0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3,4	124 days ± 25%
5,6,7	62 days ± 25%
8 or more	31 days ± 25%

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*The inspection interval for each type of snubber shall not be lengthened more than one step at a time unless a generic problem has been identified and corrected; in that event the inspection interval may be lengthened one step the first time and two steps thereafter if no inoperable snubbers of that type are found.

#The provisions of Specification 4.0.2 are not applicable.

**The visual inspection of snubber numbers 129 and 130 (PSA-1's) on containment spray may be deferred until the first refueling.

ATTACHMENT A

SAFETY EVALUATION
SIGNIFICANT HAZARDS EVALUATION

The proposed change delays the initial in-service inspection on two safety-related snubbers until the first refueling outage. All other snubbers have been inspected according to the existing requirements. The basis for the visual inspection frequency is "based upon maintaining a constant level of snubber protection to systems."

The two remaining snubbers (#129 and #130) are located high in the shield building annulus and could not be reached during the recent outage when the other snubbers were inspected without breaking shield building integrity or major scaffolding. These are PSA-1 snubbers on the containment spray system. Snubber #130 was examined by means of a searchlight and binoculars, and no indication of problems were found. Snubber #129 could not be examined in this manner due to line of sight obstructions.

This proposed amendment compares closely to example (vi) as listed in the "Examples of Amendments that are not considered likely to involve Significant Hazards Considerations", 48 FR 14870 (4/16/83) as shown below:

vi) The proposed change may result in some increase to the probability or consequences of previously-analyzed accident or may reduce in some way a safety margin due to the relaxed inspection interval on some snubbers.

Further, FPL has visually inspected all other snubbers against the criteria of T.S. surveillance 4.7.9(d) and found no discrepancies. The two snubbers in question are on lines in standby service so are not subject to vibration or thermal expansion. Additionally they are inside the shield building so they are not subject to either weather or plant related environmental effects. This provides additional confidence that the two remaining inaccessible snubbers will function satisfactorily in the interim period.

Based on the preceding safety evaluation and comparison to the Examples of Amendments are <u>not</u> likely to involve significant hazards consideration, these proposed changes are not a significant safety hazard in that they do not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or

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.