## 3/4 7.10 SNUBBERS

### LIMITING CONDITION FOR OPERATION

3.7.10 All safety related snubbers ~~listed in Tables 3.7-2a and 3.7-2b~~ 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 safety related snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

### SURVEILLANCE REQUIREMENTS

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

a. Visual Inspections

~~The first inservice visual inspection of snubbers shall be performed after four months but within 10 months of commencing POWER OPERATION and shall include all snubbers listed in Tables 3.7-2a and 3.7-2b. If less than two (2) snubbers 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 per Inspection Period | Subsequent Visual Inspection Period*# |
|---|---|
| 0 | 18 months ± 25% |
| 1 | 12 months ± 25% |
| 2 | 6 months ± 25% |
| 3, 4 | 123 days ± 25% |
| 5, 6, 7 | 62 days ± 25% |
| 8 or more | 31 days ± 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.

*The inspection interval 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 may be lengthened one step the first time and two steps thereafter if no inoperable snubbers are found.

#The provisions of Specification 4.0.2 are not applicable.

SURVEILLANCE REQUIREMENTS (Continued).

b. Visual Inspection Acceptance Criteria

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. 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; and/or (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specifications 4.7.10.d or 4.7.10.e, as applicable.

c. Functional Tests

At least once per 18 months during shutdown, a representative sample* (10% of the safety related snubbers) ~~listed in Tables 3.7-2a and 3.7-2b~~ 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 Specification 4.7.10.d or 4.7.10.e, an additional 10% of that type of snubber shall be functionally tested. Functional testing shall continue until no additional snubbers are found inoperable or all safety related snubbers ~~listed in Tables 3.7-2a and 3.7-2b~~ have been tested.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers.

Snubbers identified ~~in Tables 3.7-2a and 3.7-2b~~ as "Especially Difficult to Remove" or in "High Exposure Zones During Shutdown" shall also be included in the representative sample.** ~~Tables 3.7-2a and 3.7-2b~~ may be used jointly or separately as the basis for the sampling plan.

Safety related Hydraulic snubber listings and safety related mechanical snubber listings

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers shall not result in additional functional testing due to failure.

~~*The requirements of this section for functionally testing mechanical snubbers may be waived until startup following the fifth refueling outage for Unit 1.~~

**Permanent or other exemptions from the 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)

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 design subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test acceptance criteria.

d. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

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

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

e. Mechanical Snubbers Functional Test Acceptance Criteria

The 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.

2. Activation (restraining action) is achieved in both tension and compression.

f. Snubber Service Life Monitoring

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 designed service life is based shall be maintained as required by Specification 6.10.2.~~n~~.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, the installation and maintenance records for each safety related snubber ~~listed in Tables 3.7-2a and 3.7-2b~~ shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded by more than 10% prior to the next scheduled snubber service life review. If the indicated service life will be exceeded by more than 10% 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. The results of the reevaluation may be used to justify a change to the service life of the snubber. This reevaluation, replacement or reconditioning shall be indicated in the records.

## TABLE 3.7-2a
## SAFETY RELATED HYDRAULIC SNUBBERS*

| FPL LOCATION NO. | MARK NO. | SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION | ACCESSIBLE OR INACCESSIBLE (A or I) | HIGH RADIATION ZONE** (Yes or No) | ESPECIALLY DIFFICULT TO REMOVE (Yes or No) |
|---|---|---|---|---|---|
| 001 | SS-1 1A | MS, Steam Gen. 1A, Evel. 62′ | I | No | Yes |
| 002 | SS-2 1A | MS, Steam Gen. 1A, Evel. 62′ | I | No | Yes |
| 003 | SS-3 1A | MS, Steam Gen. 1A, Evel. 62′ | I | No | Yes |
| 004 | SS-4 1A | MS, Steam Gen. 1A, Evel. 62′ | I | No | Yes |
| 005 | SS-5 1A | MS, Steam Gen. 1A, Evel. 62′ | I | No | Yes |
| 006 | SS-6 1A | MS, Steam Gen. 1A, Evel. 62′ | I | No | Yes |
| 007 | SS-7 1A | MS, Steam Gen. 1A, Evel. 62′ | I | No | Yes |
| 008 | SS-8 1A | MS, Steam Gen. 1A, Evel. 62′ | I | No | Yes |
| 009 | SS-1 1B | MS, Steam Gen. 1B, Elev. 62′ | I | No | Yes |
| 010 | SS-2 1B | MS, Steam Gen. 1B, Elev. 62′ | I | No | Yes |
| 011 | SS-3 1B | MS, Steam Gen. 1B, Elev. 62′ | I | No | Yes |
| 012 | SS-4 1B | MS, Steam Gen. 1B, Elev. 62′ | I | No | Yes |
| 013 | SS-5 1B | MS, Steam Gen. 1B, Elev. 62′ | I | No | Yes |
| 014 | SS-6 1B | MS, Steam Gen. 1B, Elev. 62′ | I | No | Yes |
| 015 | SS-7 1B | MS, Steam Gen. 1B, Elev. 62′ | I | No | Yes |
| 016 | SS-8 1B | MS, Steam Gen. 1B, Elev. 62′ | I | No | Yes |
| 017 | 1A1 | RC, RCP Motor 1A1, Elev. 57′ | I | No | No |
| 018 | 1A2 | RC, RCP Motor 1A1, Elev. 57′ | I | No | No |
| 019 | 1B1 | RC, RCP Motor 1A1, Elev. 57′ | I | No | No |
| 020 | 1B2 | RC, RCP Motor 1A1, Elev. 57′ | I | No | No |

DELETE

TABLE 3.7-2a (CONTINUED)
SAFETY RELATED HYDRAULIC SNUBBERS*

| FPL LOCATION NO. | MARK NO. | SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION | ACCESSIBLE OR INACCESSIBLE (A or I) | HIGH RADIATION ZONE** (Yes or No) | ESPECIALLY DIFFICULT TO REMOVE (Yes or No) |
|---|---|---|---|---|---|
| 033 | MS 649-319 | MS, Reactor Bldg. Elev. 82′ | A | No | No |
| 034 | MS 548-5 | MS, Reactor Bldg. Elev. 82′ | A | No | No |
| 035 | MS 1076-3164 | MS, M.S. Trestle, Elev. 62′ | A | No | No |
| 036 | MS 649-314 | MS, Reactor Bldg. Elev. 55′ | I | No | No |
| 037 | MS 649-314 | MS, Reactor Bldg. Elev. 82′ | I | No | No |
| 038 | MS 649-310 | MS, Reactor Bldg. Elev. 50′ | I | No | No |
| 039 | MS 649-304A | MS, Reactor Bldg. Elev. 30′ | A | No | Yes |
| 040 | MS 548-9 | MS, Reactor Bldg. Elev. 50′ | I | No | Yes |
| 041 | MS 548-9 | MS, Reactor Bldg. Elev. 50′ | I | No | Yes |
| 042 | BF 549-7 | BF, Reactor Bldg. Elev. 40′ | I | No | No |
| 043 | BF 549-7 | BF, Reactor Bldg. Elev. 40′ | I | No | No |
| 044 | BF 549-8 | BF, Reactor Bldg. Elev. 40′ | I | No | Yes |
| 047 | BF 549-17 | BF, Reactor Bldg. Elev. 36′ | A | No | Yes |
| 052 | BF 549-17 | BF, Reactor Bldg. Elev. 36′ | A | No | No |
| 053 | SI 968210 | SI, Reactor Bldg. Elev. 16′ | I | No | No |
| 058 | SI 969 1216 | SI, Reactor Bldg. Elev. 18′ | A | No | No |
| 061 | MS 549-11 | SI, Reactor Bldg. Elev. 18′ | A | No | No |
| 066 | MS 549-11 | SI, Reactor Bldg. Elev. 20′ | I | No | No |
| 073 | SI 972-6240 | SI, Reactor Bldg. Elev. 16′ | I | No | No |
| 074 | SI 973-240 | SI, Reactor Bldg. Elev. 18′ | A | No | No |
| 076 | SI 973-6224 | SI, Reactor Bldg. Elev. 18′ | A | No | No |
| 077 | SI 868 64 | SI, RAB, Elev. 4′ | A | No | No |
| 079 | SI 868-163 | SI, RAB, Elev. 4′ | A | No | No |
| 080 | SI 868 410 | SI, RAB, Elev. 4′ | A | No | No |
| 081 | SI 676-67 | SI, RAB, Elev. 4′ | A | No | No |
| 082 | SI 676 67 | SI, RAB, Elev. 4′ | A | No | No |
| 083 | SI 676-105 | SI, RAB, Elev. 4′ | A | No | No |

DELETE

TABLE 3.7-2a (CONTINUED)
SAFETY RELATED HYDRAULIC SNUBBERS*

| FPL LOCATION NO. | MARK NO. | SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION | ACCESSIBLE OR INACCESSIBLE (A or I) | HIGH RADIATION ZONE** (Yes or No) | ESPECIALLY DIFFICULT TO REMOVE (Yes or No) |
|---|---|---|---|---|---|
| 084 | SI 676-105 | SI, RAB, Elev. 4′ | A | No | No |
| 086 | SI 676 129 | SI, RAB, Elev. 4′ | A | No | No |
| 087 | SI 676-2481 | SI, RAB, Elev. 24′ | A | No | No |
| 110 | SI 676 247 | SI, RAB, Elev. 30′ | A | No | No |
| 111 | SI 676-2475A | SI, RAB, Elev. 30′ | A | No | No |
| 112 | SI 676 4505 | SI, RAB, Elev. 7′ | A | No | No |
| 114 | SI 972-6240 | SI, RAB, Elev. 4′ | A | No | No |
| 091 | SPS-417 | Pressurizer Spray, Reactor Bldg. Elev. 50′ | I | No | No |
| 090 | SPS-27 | Pressurizer Spray, Reactor Bldg. Elev. 50′ | I | No | No |
| 092 | SPS-467 | Pressurizer Spray, Reactor Bldg. Elev. 80′ | A | No | No |
| 093 | SPS-777 | Pressurizer Spray, Reactor Bldg. Elev. 80′ | A | No | No |

DELETE

TABLE 3.7-2a (CONTINUED)
SAFETY RELATED HYDRAULIC SNUBBERS*

| FPL LOCATION NO. | MARK NO. | SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION (A or I) | ACCESSIBLE OR INACCESSIBLE ("A" or "I") | HIGH RADIATION ZONE** (Yes or No) | ESPECIALLY DIFFICULT TO REMOVE |
|---|---|---|---|---|---|
| 096 | CC-1865-9 | CC, Reactor Bldg, Elev. 25' | A | No | No |
| 088 | CC-1899-48 | CC, Reactor Bldg, Elev. 25' | A | No | No |
| 089 | CC-1852-6241 | CC, Reactor Bldg, Elev. 25' | A | No | No |
| 101 | CC-17-1 | CC, RAB, Elev. 20' | A | No | No |
| 102 | MS-649-313 | CC, RAB, Elev. 26' | A | No | No |
| 104 | CC-21-1 | CC, RAB, Elev. 20' | A | No | No |
| 103 | BF-549-7 | CC, RAB, Elev. 26' | A | No | No |
| 105 | CC-23-2 | CC, RAB, Elev. 26' | A | No | No |
| 106 | CH-3-40 | CH, RAB, Elev. 34' | A | No | No |
| 107 | CH-3-75 | CH, RAB, Elev. 23' | A | No | No |
| 108 | MS-649-313 | MS, Reactor Bldg, Elev. 80' | I | No | No |
| 109 | MS-649-313 | MS, Reactor Bldg, Elev. 80' | I | No | No |
| 097 | MS-649-314 | MS, Reactor Bldg, Elev. 80' | I | No | No |
| 099 | MS-649-314 | MS, Reactor Bldg, Elev. 80' | I | No | No |

DELETE

~~*Snubbers may be added to or removed from safety related systems without prior License Amendment to Table 3.7-2a provided a revision to Table 3.7-2a is included with the next License Amendment request.~~

~~**Modifications to this column due to changes in high radiation areas may be made without prior License Amendment provided that a revision to Table 3.7-2a is included with the next License Amendment request.~~

## TABLE 3.7-2b
## SAFETY RELATED MECHANICAL SNUBBERS*

| FPL LOCATION NO. | MARK NO. | SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION (A or I) | ACCESSIBLE OR INACCESSIBLE (Yes or No) | HIGH RADIATION ZONE** (Yes or No) | ESPECIALLY DIFFICULT TO REMOVE |
|---|---|---|---|---|---|
| 021 | RC 005-34A | RC, Reactor Bldg, Elev. 68′ | A | NO | NO |
| 022 | RC 005-34B | RC, Reactor Bldg, Elev. 68′ | A | NO | NO |
| 023 | RC 005-36 | RC, Reactor Bldg, Elev. 68′ | A | NO | NO |
| 025 | RC 005-12B | RC, Reactor Bldg, Elev. 80′ | A | NO | NO |
| 026 | RC 005-12B | RC, Reactor Bldg, Elev. 80′ | A | NO | NO |
| 024 | RC 005-12A | RC, Reactor Bldg, Elev. 80′ | A | NO | NO |
| 028 | RC 005-55C | RC, Reactor Bldg, Elev. 80′ | A | NO | NO |
| 027 | RC 005-55B | RC, Reactor Bldg, Elev. 80′ | A | NO | NO |
| 029 | RC 005-62A | RC, Reactor Bldg, Elev. 80′ | A | NO | NO |
| 030 | RC 005-89 | RC, Reactor Bldg, Elev. 80′ | A | NO | NO |
| 031 | RC 005-90 | RC, Reactor Bldg, Elev. 80′ | A | NO | NO |
| 032 | RC 005-98 | RC, Reactor Bldg, Elev. 80′ | A | NO | NO |
| 045 | BF 549-11 | BF, Reactor Bldg. Elev. 50′ | I | NO | NO |
| 046 | BF 549-11 | BF, Reactor Bldg. Elev. 50′ | I | NO | NO |
| 048 | BF 661-407 | BF, Reactor Bldg. Elev. 40′ | I | NO | NO |
| 049 | BF 661 0407 | BF, Reactor Bldg. Elev. 40′ | I | NO | NO |
| 050 | BF 661-416 | BF, Reactor Bldg. Elev. 50′ | I | NO | NO |
| 051 | BF 661-416 | BF, Reactor Bldg. Elev. 50′ | I | NO | NO |
| 054 | SI 968-565 | SI, Reactor Bldg. Elev. 25′ | A | NO | NO |
| 055 | SI 989 1205 | SI, Reactor Bldg. Elev. 30′ | A | NO | NO |
| 056 | SI 968-1207 | SI, Reactor Bldg, Elev. 18′ | A | NO | NO |
| 057 | SI 969-1190 | SI, Reactor Bldg, Elev. 20′ | I | NO | NO |
| 059 | SI 969-6193 | SI, Reactor Bldg, Elev. 18′ | A | NO | NO |
| 060 | SI 969 6195 | SI, Reactor Bldg, Elev. 18′ | A | NO | NO |
| 062 | SI 969-6201 | SI, Reactor Bldg, Elev. 18′ | A | NO | NO |
| 063 | SI 696-6217 | SI, Reactor Bldg, Elev. 18′ | A | NO | NO |
| 064 | SI-696-6217 | SI, Reactor Bldg, Elev. 18′ | A | NO | NO |
| 065 | SI-970-1210 | SI, Reactor Bldg, Elev. 33′ | I | NO | NO |

DELETE

3/4 7-36

Amendment No. 44

TABLE 3.7-2b (CONTINUED)
SAFETY RELATED MECHANICAL SNUBBERS*

| FPL LOCATION NO. | MARK NO. | SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION | ACCESSIBLE OR INACCESSIBLE (A or I) | HIGH RADIATION ZONE** (Yes or No) | ESPECIALLY DIFFICULT TO REMOVE (Yes or No) |
|---|---|---|---|---|---|
| 067 | SI 970-1251 | SI, Reactor Bldg, Elev. 20' | A | NO | NO |
| 068 | SI 971-6 | SI, Reactor Bldg, Elev. 20' | I | NO | NO |
| 069 | SI 971-1229 | SI, Reactor Bldg, Elev. 20' | I | NO | NO |
| 070 | SI 971-6229 | SI, Reactor Bldg, Elev. 20' | I | NO | NO |
| 071 | SI 971-6236 | SI, Reactor Bldg, Elev. 20' | I | NO | NO |
| 072 | SI 972-1243 | SI, Reactor Bldg, Elev. 25' | A | NO | NO |
| 075 | SI 973-6219 | SI, Reactor Bldg, Elev. 36' | I | NO | NO |
| 078 | SI 868 111 | SI, RAB, Elev. 4' | A | NO | NO |
| 095 | SI 676-127 | SI, RAB, Elev. 4' | A | NO | NO |
| 113 | SI 971-6236 | SI, RAB, Elev. 4' | A | NO | NO |
| 094 | CS-832-118 | CS, Reactor Bldg, Elev. 125' | A | NO | YES |
| 085 | CS-878 115 | CS, Reactor Bldg, Elev. 18' | A | No | YES |
| 098 | CC-1899-2208 | CC, Reactor Bldg, Elev. 59' | A | NO | NO |
| 100 | CC-1865-2207 | CC, Reactor Bldg, Elev. 59' | A | NO | NO |

DELETE

TABLE 3.7-2b (CONTINUED)
SAFETY RELATED MECHANICAL SNUBBERS*

| FPL LOCATION NO. | MARK NO. | SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION | ACCESSIBLE OR INACCESSIBLE (A or I) | HIGH RADIATION ZONE** (Yes or No) | ESPECIALLY DIFFICULT TO REMOVE (Yes or No) |
|---|---|---|---|---|---|
| 115 | RC164-11 | RC RCB Elev. 36' | I | NO | NO |
| 116 | RC162-11 | RC RCB Elev. 35' | I | NO | NO |
| 117 | RC-1-221A | RC RCB Elev. 31' | I | NO | NO |
| 118 | RC-1-124B | RC RCB Elev. 19' | I | NO | NO |
| 119 | RC162-11 | RC RCB Elev. 35' | I | NO | NO |
| 120 | RC-1-192A | RC RCB Elev. 19' | I | NO | NO |
| 121 | RC-5-475 | RC RCB Elev. 77' | I | NO | NO |
| 122 | CH-129-99 | CH RCB Elev. 33' | I | NO | NO |
| 123 | RC-217-5 | RC RCB Elev. 75' | I | NO | NO |
| 124 | CH-65-54C | CH RAB Elev. 21' | I | NO | NO |
| 125 | CH-142-9 | CH RCB Elev. 20' | I | NO | NO |
| 126 | CH143-30C | CH RCB Elev. 17' | I | NO | NO |
| 127 | RC-215-9A | RC RCB Elev. 73' | I | NO | NO |
| 128 | MSI-22-3A | MS RCB Elev. 57' | I | NO | NO |
| 129 | RC-1-124C | RC RCB Elev. 19' | I | NO | NO |
| 130 | MSI-20-3A | MS RCB Elev. 58' | I | NO | NO |
| 131 | MSI-16-3A | MS RCB Elev. 57' | I | NO | NO |
| 132 | CH-125-35B | CH RCB Elev. 30' | I | NO | NO |
| 133 | MSI-14-3A | MS RCB Elev. 52' | I | NO | NO |
| 134 | CH-129-339 | CH RCB Elev. 32' | I | NO | NO |
| 135 | RC-220-105 | RC RCB Elev. 72 | I | NO | NO |
| 136 | RC-217-5 | RC RCB Elev. 75' | I | NO | NO |
| 137 | CH 129-339 | CH RCB Elev. 32' | I | NO | NO |
| 138 | RC 114-129 | RC RCB Elev. 68' | I | NO | NO |
| 139 | RC 221-162 | RC RCB Elev. 68' | I | NO | NO |
| 140 | CH-187-38A | CH RCB Elev. 24' | I | NO | NO |
| 141 | CH-143-26C | CH RCB Elev. 17' | I | NO | NO |
| 142 | CH-141-74 | CH RCB Elev. 24' | I | NO | NO |
| 143 | B-2-H1 | B RCB Elev. 38' | I | NO | NO |
| 144 | RC 128-99 | RC RCB Elev. 67' | I | NO | NO |
| 145 | CH-143-34C | CH RCB Elev. 17' | I | NO | NO |
| 146 | RC-1-25C | RC RCB Elev. 31' | I | NO | NO |
| 147 | CH-141-36=C | CH RCB Elev. 32' | I | NO | NO |

DELETE

TABLE 3.7-2b (CONTINUED)
SAFETY RELATED MECHANICAL SNUBBERS*

| FPL LOCATION NO. | MARK. NO. | SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION | ACCESSIBLE OR INACCESSIBLE (A or I) | HIGH RADIATION ZONE** (Yes or No) | ESPECIALLY DIFFICULT TO REMOVE (Yes or No) |
|---|---|---|---|---|---|
| 148 | RC-1-124A | RC RCB Elev. 17' | I | NO | NO |
| 149 | MSI-10-3A | MS RCB Elev. 57' | I | NO | NO |
| 150 | MSI-8-3A | MS RCB Elev. 57' | I | NO | NO |
| 151 | CH 142-17 | CH RCB Elev. 21' | I | NO | NO |
| 152 | RC-163-11 | RC RCB Elev. 35' | I | NO | NO |
| 153 | RC 165-11 | RC RCB Elev. 35' | I | NO | NO |
| 154 | MSI-18-3A | MS RCB Elev. 57' | I | NO | NO |
| 155 | RC 128-99 | RC RCB Elev. 68' | I | NO | NO |
| 156 | MSI-12-3A | MS RCB Elev. 57' | I | NO | NO |
| 157 | RC 219-6B | RC RCB Elev. 71' | I | NO | NO |
| 158 | CH 142-18 | CH RCB Elev. 21' | I | NO | NO |
| 159 | RC 163-11 | RC RCB Elev. 35' | I | NO | NO |
| 160 | CH 142-18 | CH RCB Elev. 21' | I | NO | NO |
| 161 | RC 165-11 | RC RCB Elev. 35' | I | NO | NO |
| 162 | RC-217-5 | RC RCB Elev. 75' | I | NO | NO |
| 163 | SI-69-58 | SI RCB Elev. 62' | I | NO | NO |
| 164 | SI-39-6 | SI RAB Elev. 12' | I | NO | NO |
| 165 | RC 221-148 | RC RCB Elev. 72' | I | NO | NO |
| 166 | RC 164-11 | RC RCB Elev. 36' | I | NO | NO |
| 167 | CH-67-81 | CH RAB Elev. 21' | I | NO | NO |
| 168 | RC 114-129 | RC RCB Elev. 68' | I | NO | NO |
| 169 | RC-44-26 | RC RCB Elev. 40' | I | NO | NO |
| 170 | RC 220-112 | RC RCB Elev. 71' | I | NO | NO |
| 171 | RC 218-26 | RC RCB Elev. 76' | I | NO | NO |
| 172 | RC 44-11 | RC RCB Elev. 35' | I | NO | NO |
| 173 | CH 67-81 | CH RAB Elev. 21' | I | NO | NO |
| 174 | CH-65-54A | CH RAB Elev. 12' | I | NO | NO |
| 175 | RC 220-112 | RC RCB Elev. 72' | I | NO | NO |
| 176 | MSI-2-HI | MS RCB Elev. 78' | I | NO | NO |
| 177 | RC 222-43 | RC RCB Elev. 70' | I | NO | NO |
| 178 | MSI-4-HI | MS RCB Elev. 78' | I | NO | NO |

DELETE

TABLE 3.7-2b (CONTINUED)
SAFETY RELATED MECHANICAL SNUBBERS*

| FPL LOCATION NO. | MARK NO. | SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION | ACCESSIBLE OR INACCESSIBLE (A or I) | HIGH RADIATION ZONE** (Yes or No) | ESPECIALLY DIFFICULT TO REMOVE (Yes or No) |
|---|---|---|---|---|---|
| 180 | RC 220-114 | RC RCB Elev. 71' | I | NO | NO |
| 181 | RC 215-9B | RC RCB Elev. 74' | I | NO | NO |
| 182 | RC 219-6A | RC RCB Elev. 73' | I | NO | NO |
| 182 | MS1-3-H1 | MS RCB Elev. 78' | I | NO | NO |
| 184 | RC 218-26 | RC RCB Elev. 76' | I | NO | NO |
| 185 | CH-64-45A | CH RAB Elev. 30' | I | NO | NO |
| 186 | B-1-H3A | B RCB Elev. 38' | I | NO | NO |
| 187 | SI-69 60B | SI RCB Elev. 57' | I | NO | NO |
| 188 | RC 150-H7 | RC RCB Elev. 50' | I | NO | NO |
| 189 | SI-69 60 | SI RCB Elev. 57' | I | NO | NO |
| 190 | CH-141-44A | CH RCB Elev. 32' | I | NO | NO |
| 191 | CH-141-44A | CH RCB Elev. 32' | I | NO | NO |
| 192 | B-3-795 | B RAB Elev. 36' | I | NO | NO |
| 193 | CH 130-66 | CH RAB Elev. 26' | I | NO | NO |
| 194 | MSH-7B | MS Steam Trestle Elev. 38' | A | NO | NO |
| 195 | MPR-200-250 | MP RCB Elev. 34' | I | NO | NO |
| 196 | MSH-7A | Sm Stream Trestle Elev. 38' | A | NO | NO |
| 197 | MPR-201-16 | MP RCB Elev. 35' | I | NO | NO |
| 198 | MPR 200-20 | MP RCB Elev. 35' | I | NO | NO |
| 199 | B-21-311 | B-RAB Elev. 36' | A | NO | NO |
| 200 | B-21-3110 | B-RAB Elev. 35' | A | NO | NO |
| 201 | B-21-3240 | B-RAB Elev. 38' | A | NO | NO |
| 202 | CC-1899-2200 | CC-RCB Elev. 57' | I | NO | NO |

DELETE

~~*Snubbers may be added to or removed from safety related systems without prior License Amendment to Table 3.7-2b provided a revision to Table 3.7-2b is included with the next License Amendment request.~~

~~**Modifications to this column due to changes in high radiation areas may be made without prior License Amendment provided that a revision to Table 3.7-2b is included with the next License Amendment request.~~

3/4.7.7 CONTROL ROOM EMERGENCY VENTILATION SYSTEM (Continued)

for operations personnel during and following all credible accident conditions. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criteria 10 of Appendix "A", 10 CFR 50.

3/4.7.8 ECCS AREA VENTILATION SYSTEM

The OPERABILITY of the ECCS area ventilation system ensures that radioactive materials leaking from the ECCS equipment following a LOCA are filtered prior to reaching the environment. The operation of this system and the resultant effect on offsite dosage calculations was assumed in the accident analyses.

3/4.7.9 SEALED SOURCE CONTAMINATION

The limitations on sealed source removable contamination ensure that the total body or individual organ irradiation does not exceed allowable limits in the event of ingestion or inhalation of the probable leakage from the source material. The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. Quantities of interest to this specification which are exempt from the leakage testing are consistent with the criteria of 10 CFR Parts 30.11-20 and 70.19. Leakage from sources excluded from the requirements of this specification is not likely to represent more than one maximum permissible body burden for total body irradiation if the source material is inhaled or ingested.

3/4.7.10 SNUBBERS

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

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 observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Inspections performed

g. Records of training and qualification for current members of the unit staff.

h. Records of in-service inspections performed pursuant to these Technical Specifications.

i. Records of Quality Assurance activities required by the QA Manual.

j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.

k. Records of meetings of the FRG and the CNRB.

l. Records of the service lives of all safety related snubbers ~~listed in Tables 3.7-2a and 3.7-2b~~ including the date at which the service life commences and associated installation and maintenance records.

m. Records of secondary water sampling and water quality.

n. Annual Radiological Environmental Operating Reports and records of analyses transmitted to the licensee which are used to prepare the Annual Radiological Environmental Monitoring Report.

o. Meteorological data, summarized and reported in a format consistent with the recommendation of Regulatory Guides 1.21 and 1.23.

p. Records of audits performed under the requirements of Specifications 6.5.2.8 and 6.8.4.

## 6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

## ATTACHMENT 2

## EVALUATION/DETERMINATION OF

## NO SIGNIFICANT HAZARDS CONSIDERATION

### Background

In May 1984, the NRC issued Generic Letter 84-13 (Technical Specification for Snubbers) which reassessed the inclusion of snubber listings within the Technical Specifications. It was concluded in the Generic Letter that such listings are not necessary provided the snubber Technical Specification is modified to specify which snubbers are required to be OPERABLE. The Limiting Condition for Operation (LCO), surveillance requirements, and recordkeeping requirements will be maintained within the Technical Specifications. The snubber listings, when deleted from the Technical Specifications, will be maintained per controlled documents. Changes in snubber quantities, type, or locations would be a change to the facility and would, therefore, be subject to the provisions of 10 CFR Part 50.59.

### Discussion

This proposed change to the Technical Specifications is being processed to delete snubber Tables 3.7-2a, "Safety Related Hydraulic Snubbers" and 3.7-2b, "Safety Related Mechanical Snubbers," from the Technical Specifications. This change closely follows NRC guidance (GL 84-13) for implementation. However, we have tailored the recommended LCO wording as described in the following discussion.

Generic Letter 84-13 recommended the following LCO wording:

> All snubbers shall be OPERABLE, the only snubbers excluded from this requirement 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.

Our proposed Technical Specification would simply state: "All safety related snubbers shall be OPERABLE." All snubbers currently listed in the Technical Specification tables are safety related. Additionally, St. Lucie Unit 1 and Unit 2 Technical Specifications already contain the statement as written in the second sentence of the NRC suggested LCO. This statement, concerning snubber failures which may impact safety related systems, is currently contained in both Unit 1 and 2 Technical Specification Bases.

In addition to deleting the snubber tables from the Technical Specifications, the following changes are also proposed:

(A) Tables 3.7-2a and 3.7-2b: All references to Tables 3.7-2a and 3.7-2b have been deleted since these tables have been removed.

[illegible]

(B) First Inservice Visual Inspection: The first inservice visual inspection of snubbers at St. Lucie Unit 1 has been performed and reference to this inspection is not required since this one time Surveillance Requirement has been completed.

(C) Safety Related: This change incorporates the words "safety related" in various locations (prior to the word "snubber") in order to maintain consistency with the LCO.

(D) Footnote: The footnote concerning the waiving of mechanical snubber functional test requirements until startup following the fifth refueling outage has been deleted since the fifth refueling outage has been completed.

(E) Snubber Service Life Monitoring: Records of the service life of each snubber shall be maintained as required by Administrative Controls Section 6.10.2.l (Amendment 69 to Facility Operating License DPR-67 changed the alphabetical location of this requirement from 6.10.2.m to 6.10.2.l. This change reflects the correction of the alphabetical location of this requirement from 6.10.2.m to 6.10.2.l).

Determination of No Significant Hazards Consideration

The standards used to arrive at a determination that proposed changes do not involve a significant hazards consideration are included in 10 CFR 50.92(c), which states that the Commission may make such a determination if operation of the facility in accordance with the proposed amendment would 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.

With respect to criterion (1), the changes being proposed by FPL are administrative; they do not affect assumptions contained in plant safety analyses, nor do they affect Technical Specifications that do preserve safety analysis assumptions. Safety related snubbers will continue to be controlled and surveilled according to Technical Specifications. Changes in snubber quantities, types, or locations would be a change to the facility and would be adequately controlled per the provisions of 10 CFR 50.59. Therefore, the proposed changes do not affect the probability or consequences of accidents previously analyzed.

With respect to criterion (2), the changes being proposed by FPL are administrative; they will not lead to physical modifications. These changes do not add to, or delete from, the total number of plant snubbers available to provide dynamic load support during and following a seismic event or other initiating dynamic loads. Therefore, the proposed changes do not create the possibility of a new or different kind of accident.

With respect to criterion (3), the changes being proposed by FPL are administrative; they do not modify the safety margins defined in and maintained by the Technical Specifications. The NRC has concluded that snubber listings are not necessary provided the snubber Technical Specification specifies which snubbers are required to be OPERABLE. The snubber LCO has been clarified to show that all safety related snubbers must be OPERABLE. This change does not involve a significant reduction in a margin of safety since: 1) the LCO clearly specifies which snubbers are required to be OPERABLE, and 2) the snubber listing will be maintained via controlled documents.

In addition, the Commission has provided guidance (48 FR 14870) concerning the application of standards for determining whether a significant hazards consideration exists by presenting examples of amendments that are considered not likely to involve a significant hazards consideration. Example (i) relates to a purely administrative change to the Technical Specifications: for example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature. The changes being proposed by FPL are similar to example (i) in 48 FR 14870 in that they are administrative changes designed to:

- Remove snubber listings from Tables 3.7-2a and 3.7-2b as per Generic Letter 84-13.
- Remove outdated material.
- Correction of an error.