

ATTACHMENT 1

1.4 Operable-Operability

A system, subsystem, train, component or device shall be operable or have operability when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal or emergency electrical power sources (subject to Section 3.0.2), cooling or seal water; lubrication, supports, or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

ATTACHMENT 2

1. Clarification of the July 24, 1987 response to NRC Staff question #4 regarding SG snubbers.

The SG snubbers are not required to be functionally tested, since snubber lockup is not a credible failure mode. However, extensive maintenance is performed on these snubbers in order to comply with the "snubber seal service life monitoring" Technical Specification 4.14.1.f. That maintenance is described in Procedure M-40.7, which provides instructions for removal, inspection, maintenance, test, and reinstallation of Anker-Holth snubbers on the steam generators. These activities include disassembly, cleaning, replacement of all seals and replacement of hydraulic fluid. Following the rebuilding of the snubber, a hydrostatic test is performed on each snubber to verify pressure integrity and seal installation. These activities are performed at a maximum of a 10 year interval so as to ensure snubber seal service life is not exceeded. The results of this maintenance are recorded in the plant records in accordance with proposed Technical Specification 6.10.2.m. All 16 steam generator snubbers have been rebuilt twice each since plant startup.

2. Response to NRC Staff Question on Mechanical Snubbers

The Standard Technical Specifications state that mechanical snubber functional test acceptance criteria include: "Drag force shall not have increased more than 50% since the last functional test." In lieu of this, RG&E provides the following means of monitoring snubber drag forces in the Ginna Station Snubber Inspection and Test Program. The program requires functional test results to be reviewed to determine acceptability of results. If drag force is not greater than 1% of snubber normal design load, the snubber may be installed in any location. If snubber drag force is between 1% and 5%, the snubber acceptability is based on a table correlating snubber size with pipe size. Over a 5% drag is considered unacceptable. However, any snubber with a drag force greater than 2% is considered degraded and is required to be repaired or replaced as a preventive maintenance measure. Thus, RG&E considers that the identification of potential degradation relative to required snubber function is conservatively evaluated and monitored in our present program.

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