Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Snubber Visual Inspection Intervals

ATTACHMENT 1

PLANT SYSTEMS

3/4.7.6 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.6 All snubbers shall be OPERABLE. The only snubbers excluded from the requirements 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.

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 on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.6f. on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program in addition to the requirements of Specification 4.0.5.

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

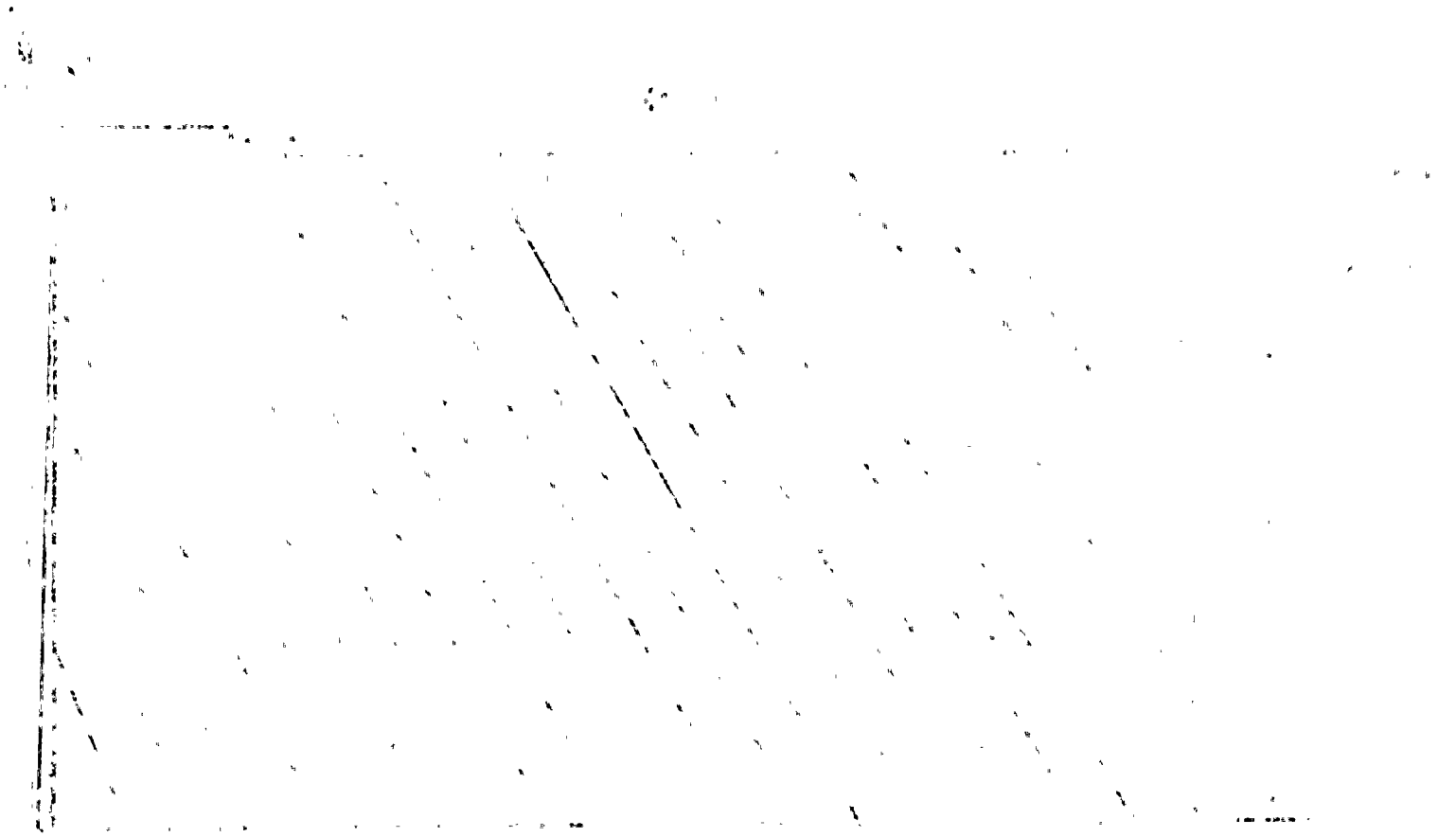
Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these ~~groups~~ categories (inaccessible and accessible) may be inspected independently according to the schedule ~~below.~~ determined by Table 4.7-1 The first inservice visual inspection of each type of snubber shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers. If all snubbers of each type (on any system) are found OPERABLE during the first inservice visual inspection, the second inservice visual inspection (of that system) shall be performed at the first refueling outage. Otherwise, subsequent visual inspections of a given system shall be performed in accordance with the following schedule:

Replace with Insert 1

No. of Inoperable Snubbers of Each Type (on any system) 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%

*The inspection interval for each type of snubber (on a given system) 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 (on that system).

**The provisions of Specification 4.0.2 are not applicable.



SURVEILLANCE REQUIREMENTS (Continued)

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: (1) ~~there are~~ the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage 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, provided 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 (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.6e. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as ~~inoperable snubbers~~.

Replace with Insert 2

Replace with Insert 3

d. Functional Tests

For each unit during refueling shutdown, a representative sample of snubbers shall be tested using the following sample plan:

1) At least 10% of the total number of safety related snubbers for the respective unit identified by site records shall be functionally tested either in-place or in a bench test. For each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.6e, an additional 10% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested;

2) The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following categories;

   A. Snubbers within 5 feet of heavy equipment (ex. valves, pumps, turbines, motors, etc.)

   B. Snubbers within 10 feet of the discharge from a safety relief valve.

3) Snubbers identified by site records as "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative sample.*

*Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a 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.

INSERT 1

The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7-1 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before Amendment ___.

INSERT 2

shall be classified as unacceptable and may be reclassified acceptable

INSERT 3

unacceptable for determining the next inspection interval. A review and evaluation shall be performed to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

TABLE 4.7-1

SNUBBER VISUAL INSPECTION INTERVAL

	NUMBER OF UNACCEPTABLE SNUBBERS		
Population or Category (Notes 1 and 2)	Column A Extended Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must make and document that decision before any inspection and shall use that decision as the basis upon which to determine the next inspection interval for that category.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

Note 3: If the number of unacceptable snubbers is equal to or less that the number in Column A, the next inspection interval may be twice the previous interval but not greater that 48 months.

Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of

unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the difference in the numbers in Columns B and C.

Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

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SAFETY ANALYSIS

INTRODUCTION

Pursuant to the requirements in 10 CFR 50.92, each application for amendment to an operating license must be reviewed to determine if the modification involves a significant safety hazard. The proposed amendment, as defined in this report, has been reviewed and deemed not to involve a significant safety hazard based on the evaluation that follows.

The proposed amendment revises the visual inspection surveillance requirements and acceptance criteria associated with Technical Specification 3/4.7.6, "Snubbers," in accordance with the guidance provided in Generic Letter 90-09, "Alternative Requirements For Snubber Visual Inspection Intervals And Corrective Actions," dated December 11, 1990.

BASIS

The existing Technical Specification imposes surveillance requirements for visual inspection and functional testing of all safety-related snubbers. Snubber visual inspection is a separate process that complements the functional testing program and provides additional confidence in snubber operability. The existing surveillance interval for visual inspection assumes 18-month refueling intervals. Additionally, the existing snubber visual inspection schedule is based only on the number of inoperable snubbers found during the previous visual inspection, irrespective of the size of the snubber population.

The proposed amendment incorporates the alternative inspection schedule provided by the Staff in Generic Letter 90-09. The alternative inspection schedule is based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the various snubber populations. The visual inspection interval may be as long as 48 months, depending on the number of unacceptable snubbers found during the previous visual inspection. The alternative schedule for visual inspections maintains the same confidence level as the existing schedule and allows for the performance of visual inspections and corrective actions during plant outages. Because this line-item Technical Specification improvement will reduce future occupational radiation exposure and is highly cost effective, the alternative inspection schedule is consistent with the Commissions's policy statement on Technical Specification improvements.

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NO SIGNIFICANT HAZARDS DETERMINATION

The standards used to arrive at a determination that a request for amendment involves a no significant hazards consideration are included in the Commission's regulations, 10 CFR 50.92, which states that no significant hazards considerations are involved if the operations 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 the margin of safety. Each standard for each parameter is discussed on the following pages.

1. **Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.**

   The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change does not result in any physical change to the facility which could cause an increase in the probability or consequences of any accident previously evaluated. The requested change incorporates the alternative snubber visual inspection schedule provided by the Staff in Generic Letter 90-09, dated December 11, 1990. As determined by the Staff, the alternative schedule for visual inspections maintains the same confidence level as the existing schedule and, therefore, does not affect the probability or consequences of an accident previously evaluated.

2. **Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident previously evaluated.**

   The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed amendment does not result in any physical change to the plant or method of operating the plant from that allowed by the Technical Specifications. No new failure modes have been defined for any system or component nor has any new limiting single failure been identified. The Staff has previously reviewed the proposed changes and determined that the alternative snubber visual inspection interval maintains the same confidence level in snubber operability. Therefore, the proposed change does not create the possibility of a new or different kind of accident.

3. **Use of the modified specification would not involve a significant reduction in the margin of safety.**

The proposed amendment does not involve a significant reduction in the margin of safety. As stated above, the proposed amendment incorporates the alternative Technical Specification requirements for visual inspections of snubbers provided by the Staff in Generic Letter 90-09. The Staff has previously reviewed these changes and determined that the alternative visual inspection interval maintains the same confidence level in snubber operability. Therefore, the proposed amendment does not involve a reduction in the margin of safety.

Based on the above, it has been determined that the proposed amendment request does not,

(1) involve a significant increase in the probability or consequences of an accident previously evaluated,

(2) create the probability of a new or different kind of accident from any accident previously evaluated, or

(3) involve a significant reduction in the margin of safety;

and therefore, does not involve any significant safety hazards consideration.