

ATTACHMENT 1

Proposed Technical Specification Change

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<u>No. Inoperable Snubbers per Inspection Period</u>	<u>Subsequent Visual Inspection Period*</u>
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% #
8 or more	31 days \pm 25%

2. 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.

B. Visual Inspection Acceptance Criteria

1. Visual inspections shall verify:
- That there are no visible indications of damage or impaired operability,
 - Attachments to the foundation or supporting structure are secure, and
 - In those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up.

* The inspection interval shall not be lengthened more than one step at a time.

The current inspection period for Unit 2 may be extended to the 1985 refueling outage.

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ATTACHMENT 2

Discussion of Proposed Changes

DISCUSSION OF PROPOSED CHANGES

BACKGROUND

Technical Specification 4.17.A specifies the visual inspection interval for shock suppressors (snubbers). The interval specification serves as an administrative control to assure that snubbers are periodically inspected based on performance. Specification 4.17.B specifies the acceptance criteria for the visual inspections. Based on inspection results during the last visual snubber inspection, conducted November 9-17, 1984, at Surry Power Station Unit No. 2, the next inspection interval was determined to be 62 days \pm 25 percent, or no later than February 1, 1985.

Because inspection of all snubbers sufficient to satisfy the criteria in Specification 4.17.B cannot be conducted at power, Unit 2 must be shutdown for approximately ten days in late January, 1985, to conduct the required inspection. However, a major refueling and ten-year ISI inspection outage is scheduled to begin shortly thereafter on or about March 22, 1985. During this refueling/ISI outage, visual and functional testing of the snubbers, as required by Technical Specification 4.17.C, is scheduled to be performed.

Because the refueling/ISI outage will be conducted only a short time after the currently scheduled visual inspection, a one-time change to the Technical Specifications to defer the January visual inspection appears warranted. The change would extend the interval in Specification 4.17.A to permit conducting the visual inspection during the March, 1985 refueling outage. In addition, the deferral would minimize the additional exposure incurred by eliminating duplicate inspection efforts.

EVALUATION

The purpose of the visual inspection requirement is to insure that no observable deficiencies exist with any snubber installation that would render a snubber inoperable. During the November, 1984 outage, seven snubbers were declared inoperable due to low fluid levels in the snubber reservoirs. Of the seven, three were in individual installations, while the remaining four were all connected to a common reservoir. No other type of visual failure was discovered and the seven snubbers were repaired or replaced.

Current visual inspection criteria assure: a) that there are no visual indications of damage or impaired operability; b) attachments to the foundation or supporting structure are secure; and c) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up. Criterion "a" is verified during visual inspections by observing reservoir fluid level. Adequate fluid level indicates lack of leakage. Historically, the majority of failures identified as a result of visual inspections are related to fluid level. Only rarely has a snubber been declared inoperable due to a mounting deficiency, which is the concern addressed by Criteria "b" and "c".

In addition, in early 1984, Surry upgraded its snubber program. This upgrade has been demonstrated effective. During the recent Surry Unit 1 refueling outage, functional testing resulted in only about one-fifth of the failures which had occurred during functional testing prior to the upgrade. This upgrade was also implemented in early 1984 for Unit 2 and provides additional assurance that the snubbers will perform their safety function if required.

This approach not only maintains the required level of assurance that the snubbers are operable, but also significantly reduces the incurred dose since substantial scaffolding, climbing, and shielding will not be employed. If the January inspection was performed, the dose would be doubled since the same inspection must effectively be performed at the refueling outage a short time later.

50.59 and SIGNIFICANT HAZARDS REVIEW

Pursuant to 10 CFR 50.59, we have reviewed the proposed Technical Specification changes and have concluded that no unreviewed safety question exists: (i) the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased. Extending the inspection interval is an administrative action. In addition, the recent snubber program upgrade serves to reduce the likelihood of these events; (ii) the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created. The proposed change affects inspection scheduling only and has no impact on any accident analysis; (iii) the margin of safety as defined in the basis for any Technical Specification is not reduced. The change in the inspection interval does not affect the capability of the snubbers to perform their function. Rather, due to the recent upgrade in the Surry snubber program, the margin of safety has increased.

In a similar manner, the proposed change has been reviewed and we have concluded that no significant hazards considerations exist. The proposed change is similar to Example (iii) of the examples specified in the Federal Register, 48 FR 14870, which lists examples of amendments likely to involve significant hazards considerations. Example (iii) involves a significant relaxation of a limiting condition for operation not accompanied by compensatory changes, conditions or actions that maintain a commensurate level of safety. It could be argued that the surveillance requirement is being relaxed. However, unlike the example, a commensurate level of safety is being maintained through the recent program upgrade. In addition, the nature of the specification is administrative; it specifies inspection frequencies based on past results to assure periodic inspections. Thus, because the change is administrative, it is also similar to Example (i) of the examples of amendments that are considered not likely to involve a significant hazards consideration.

CONCLUSION

In order to minimize duplication and reduce unnecessary personnel exposure, Vepco proposes to amend the Technical Specifications to extend the current snubber visual inspection interval from January, 1985, to the March, 1985, refueling outage. Because the specified intervals are primarily an administrative control to assure periodic snubber inspection, and because of Surry's recent snubber program upgrade, the one-time extension would have no adverse impact on plant safety.

ATTACHMENT 3

Basis For Exigent Request

BASIS FOR EXIGENT REQUEST

10 CFR 50.91(a)(6) provides for handling proposed amendment requests where exigent circumstances exist and time does not permit the NRC to publish a Federal Register notice allowing thirty days for prior public comment. One subsection, paragraph (iv), requires the licensee to provide a reason for the exigency and why the licensee cannot avoid it. Where the NRC determines that the licensee has failed to use its best efforts to make a timely application in order to create the exigency and to take advantage of this procedure, the NRC will use its routine public notice and comment procedures.

The proposed change to the snubber surveillance requirement originated as a result of a previous snubber surveillance conducted November 9-17, 1984. As a result of that inspection, which consisted of a visual inspection of all snubbers, seven snubbers were declared inoperable.

In hindsight, what would appear now as an obvious consequence, i.e., that the next inspection interval would nearly coincide with the 1985 refueling outage and result in duplicate inspection efforts and unnecessary personnel exposure, was simply not immediately obvious following the inspection. Rather, the focus in late November and early December was on the detailed examination of the snubbers' failure mechanism and its implications.

When the implications of the November results were realized, an effort was conducted to identify and consider alternatives. The effort was hampered by the unavailability of key personnel during the holiday season. Nonetheless, the various alternatives, including performing engineering analyses and alternative inspection methodologies, were considered and rejected. The only reasonable alternative to mitigate the adverse impact of the required February inspection was the amendment process. Once management approval was given to proceed in this fashion, the required reviews and concurrences were conducted and obtained on a priority basis.

There has never been any intent by Vepco to create and take advantage of an exigent situation. On the contrary, we, too, would prefer to handle the proposed change in a routine manner. Also, we are unaware of any advantage to be gained by this approach. However, we are convinced that the proposed Technical Specification change is warranted and cannot be avoided if we are to maintain personnel exposures as low as reasonably achievable. The schedular deferral to achieve this - fifty days - is reasonable. The action is administrative in nature. Therefore, we request that the Commission process the proposed amendment on an exigent basis.