PLANT SYSTEMS

3/4.7.5 HYDRAULIC SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.5 All snubbers listed in Table 3.7.5-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3 (MODES 4 and 5 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 4.7.5.c on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.5 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. Visual Inspections

The first inservice visual inspection of snubbers shall be performed after four months but within ten months of commencing POWER OPERATION and shall include all snubbers listed in Table 3.7.5-1. 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	124 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.

[#]The provisions of Specification 4.0.2 are not applicable.

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) 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. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspect on 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 (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specification 4.7.5.d. However, when the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

c. Functional Tests

At least once per 18 months during shutdown, a representative sample as described below shall be selected and tested:

(10% of the total of each type of snubber in use in the plant 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 4.7.5.d, an additional 10% of that type of snubber shall be functionally tested).

(that number of snubbers which follows the expression 35 [1 + c]

where c* is the allowable number of snubbers not meeting the

[&]quot;The value c is arbitrary but will be chosen and documented prior to each functional test. The expressions are intended for use in plants with larger numbers of safety-related snubbers (>500) and provide a confidence level of approximately 95% that 90% to 100% of the snubbers in the plant will be OPERABLE within acceptable limits. That is, the confidence level will be provided no matter what value is chosen for c. It is advised, however, that discretion be used when initially choosing the value for c because the lower the value of c (the lower the amount of snubbers in the representative sample), the higher the amount of snubers required in the re-sample will be. To illustrate: If c = 2 and 3 snubbers are found not to meet the functional test acceptance criteria, there will be 70 snubbers in the representative sample and 31 snubbers required for testing in the re-sample; If c = 2 and 4 snubbers fail the functional test, there will be 70 snubbers in the representative sample and 62 snubbers required for testing in the re-sample; If c = 0 and 1 snubber fails the functional test, there will be 35 snubbers in the representative sample and 140 snubbers required for testing in the re-sample; If c = 0 and 2 snubbers fail the functions test, there will be 35 snubbers in the representative sample and 280 snubbers required for testing in the re-sample.

c. Functional Tests (Continued)

acceptance criteria selected by the operator, shall be functionally tested either in place or in a bench test. For each number of snubbers above c which does not meet the functional test acceptance criteria of Specification 4.7.5.d, an additional sample

selected according to the expression 35 $(1 + \frac{c}{2}) (\frac{2}{c+1})^2$ (a - c)

shall be functionally tested, where a is the total number of snubbers found inoperable during the functional testing of the representative sample.

Functional testing shall continue according to the expression b $[35(1+\frac{c}{2})(\frac{2}{c+1})^2]_{\text{where b}}$ is the number of snubbers found inoperable in the previous re-sample, until no additional inoperable snubbers are found within a sample or until all snubbers in Table 3.7.5-1 have been functionally 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 Table 3.7.5-1 as "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative sample.*

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.

For the snubber(s) found inoperable, an engineering evaluation shall be performed on the components which are supported by the snubber(s). The purpose of this engineering evaluation shall be to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubber(s) in order to ensure that the supported component remains capable of meeting the designed service.

^{*}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.

d. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

- Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
- Snubber bleed, or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

e. 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 designated service life is based shall be maintained as required by Specification 6.10.2.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, the installation and maintenance records for each snubber listed in Table 3.7.5-1 shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded 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 life review. This reevaluation, replacement, or reconditioning shall be indicated in the records.

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3/4.7.4 REACTOR CORE ISOLATION COOLING SYSTEM (Continued)

RCICS specifications are applicable during CONDITIONS 1, 2 and 3 when reactor vessel pressure exceeds 113 psig because RCICS is the primary non-ECCS source of emergency core cooling when the reactor is pressurized.

With RCICS inoperable, adequate core cooling is assured by the demonstrated OPERABILITY of the HPCIS system and justifies the specified out-of-service period.

The surveillance requirements provide adequate assurance that RCICS and the condensate storage tank will be OPERABLE when required. Although all active components are testable and full flow can be demonstrated by recirculation during reactor operation, a complete functional test requires reactor shutdown. The pump deischarge piping is maintained full to prevent water hammer damage and to start cooling at the earliest moment.

3/4.7.5 HYDRAULIC SNUBBERS

All snubbers are required 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 before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

3/4.7.5 HYDRAULIC SNUBBERS (Continued)

When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any safety-related component or system has been adversly affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 18 month intervals. Selection of a representative sample

according to the expression $35 \ (1 + \frac{c}{2})$ provides a confidence level of approximately 95% that 90% to 100% of the snubbers in the plant will be OPERABLE within acceptance limits. Observed failures of these sample snubbers shall require functional testing of additional units.

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc...). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions: These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

3/4.7.6 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 source matieral. The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10CFR 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 10CFR Part 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.

3,4.7.7 FIRE SUPPRESSION SYSTEMS

The OPERABILITY of the fire suppression systems ensures that adequate fire suppression capability is available to confine and excircuish fires occurring in any portion of the facility where safety related equipment is located. The fire suppression system consists of the water system, spray and/or sprinklers, CO₂, and fire hose static. The collective capability

of the fire suppression systems is adequate to minimize potential damage to safety related equipment and is a major element in the facility fire protection program.

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service.

RECORD RETENTION (Continued)

- 6.10.2 The following records shall be retained for the duration of the Facility Operating License:
 - a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
 - b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
 - c. Records of facility radiation and contamination surveys.
 - Records of radiation exposure for all individuals entering radiation control areas.
 - e. Records of gaseous and liquid radioactive material released to the environs.
 - f. Records of transient or operational cycles for those facility components identified in Table 5.7.1-1.
 - g. Records of reactor tests and experiments.
 - h. Records of training and qualification for current members of the plant staff.
 - Records of in-service inspections performed pursuant to these Technical Specifications.
 - j. Records of Quality Assurance activities required by the QA Manual.
 - k. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10CFR 50.59.
 - 1. Records of meetings of the PNSC and of the previous off-site review organization, the Company Nuclear Safety Committee (CNSC).
 - m. Records for Environmental Qualification which are covered under the provisions of paragraph 6.13.
 - n. Records of the service lives of all hydraulic and mechanical snubbers listed in Table 3.7.5-1 including the date at which the service life commences and associated installation and maintenance records.

6.11 RADIATION PROTECTION PROGRAM

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

3/4.7.5 HYDRAULIC SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.5 All snubbers listed in Table 3.7.5-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3 (MODES 4 and 5 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 4.7.5.c on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.5 Fach snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. Visual Inspections

The first inservice visual inspection of snubbers shall be performed after four months but within ten months of commencing POWER OPERATION and shall include all snubbers listed in Table 3.7.5-1. 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:

Inoperable Snubbers Inspection Period	Subsequent Inspection	
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	

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.

[#]The provision of Specification 4.0.2 are not applicable.

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) 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. 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 'ause 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 4.7.5.d. However, when the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

c. Functional Tests

At least once per 18 months during shutdown, a representative sample as described below shall be selected and tested:

(10% of the total of each type of snubber in use in the plant 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 4.7.5.d, an additional 10% of that type of snubber shall be functionally tested).

(that number of snubbers which follows the expression 35 [1 + c]

where c* is the allowable number of snubbers not meeting the

"The value c is arbitrary but will be chosen and documented prior to each functional test. The expressions are intended for use in plants with larger numbers of safety-related snubbers (>500) and provide a confidence level of approximately 95% that 90% to 100% of the snubbers in the plant will be OPERABLE within acceptable limits. That is, the confidence level will be provided no matter what value is chosen for c. It is advised, however, that discretion be used when initially choosing the value for c because the lower the value of c (the lower the amount of snubbers in the representative sample), the higher the amount of snubers required in the re-sample will be. To illustrate: If c = 2 and 3 snubbers are found not to meet the functional test acceptance criteria, there will be 70 snubbers in the representative sample and 31 snubbers required for testing in the re-sample; If c = 2 and 4 snubbers fail the functional test, there will be 70 snubbers in the representative sample and 62 snubbers required for testing in the re-sample; If c = 0 and 1 snubber fails the functional test, there will be 35 snubbers in the representative sample and 140 snubbers required for testing in the re-sample; If c = 0 and 2 snubbers fail the functions test, there will be 35 snubbers in the representative sample and 280 snubbers required for testing in the re-sample.

c. Functional Tests (Continued)

acceptance criteria selected by the operator, shall be functionally tested either in place or in a bench test. For each number of snubbers above c which does not meet the functional test acceptance criteria of Specification 4.7.5.d, an additional sample

selected according to the expression $35 \left(1 + \frac{c}{2}\right) \left(\frac{2}{c+1}\right)^2 (a-c)$ shall be functionally tested, where a is the total number of snubbers found inoperable during the functional testing of the representative sample.

Functional testing shall continue according to the expression b $[35(1+\frac{c}{2})(\frac{2}{c+1})^2]$ where b is the number of snubbers found inoperable in the previous re-sample, until no additional inoperable snubbers are found within a sample or until all snubbers in Table 3.7.5-1 have been functionally tested). The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers.

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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 .

For the snubber(s) found inoperable, an engineering evaluation shall be performed on the components which are supported by the snubber(s). The purpose of this engineering evaluation shall be to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubber(s) in order to ensure that the supported component remains capable of meeting the designed service.

^{*}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.

d. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

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e. 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 designated service life is based shall be maintained as required by Specification 6.10.2.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, the installation and maintenance records for each snubber listed in Table 3.7.5-1 shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded 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 life review. This reevaluation, replacement, or reconditioning shall be indicated in the records.

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3/4.7.4 REACTOR CORE ISOLATION COOLING SYSTEM (Continued)

RCICS specifications are applicable during CONDITIONS 1, 2 and 3 when reactor vessel pressure exceeds 113 psig because RCICS is the primary non-ECCS source of emergency core cooling when the reactor is pressurized.

With RCICS inoperable, adequate core cooling is assured by the demonstrated OPERABILITY of the HPCIS system and justifies the specified out-of-service period.

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3/4.7.5 HYDRAULIC SNUBBERS

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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 before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

3/4.7.5 HYDRAULIC SNUBBERS (Continued)

When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any safety-related component or system has been adversly affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 18 month intervals. Selection of a representative sample

according to the expression 35 $(1+\frac{c}{2})$ provides a confidence level of approximately 95% that 90% to 100% of the snubbers in the plant will be OPERABLE within acceptance limits. Observed failures of these sample snubbers shall require functional testing of additional units.

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3/4.7.6 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 source matieral. The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10CFR 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 10CFR Part 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.

3/4.7.7 FIRE SUPPRESSION SYSTEMS

The OPERABILITY of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety related equipment is located. The fire suppression system consists of the water system, spray and/or sprinklers, CO2, and fire hose stations. The collective capability

of the fire suppression systems is adequate to minimize potential damage to safety related equipment and is a major element in the facility fire protection program.

BASES

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service.

RECORD RETENTION (Continued)

- 6.10.2 The following records shall be retained for the duration of the Facility Operating License:
 - a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
 - b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
 - c. Records of facility radiation and contamination surveys.
 - d. Records of radiation exposure for all individuals entering radiation control areas.
 - e. Records of gaseous and liquid radioactive material released to the environs.
 - f. Records of transient or operational cycles for those facility components identified in Table 5.7.1-1.
 - g. Records of reactor tests and experiments.
 - h. Records of training and qualification for current members of the plant staff.
 - Records of in-service inspections performed pursuant to these Technical Specifications.
 - j. Records of Quality Assurance activities required by the QA Manual.
 - k. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10CFR 50.59.
 - Records of meetings of the PNSC and of the previous off-site review organization, the Company Nuclear Safety Committee (CNSC).
 - m. Records for Environmental Qualification which are covered under the provisions of paragraph 6.13.
 - n. Records of the service lives of all hydraulic and mechanical snubbers listed on Table 3.7-4a and 3.7-4b including the date at which the service life commences and associated installation and maintenance records.

6.11 RADIATION PROTECTION PROGRAM

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