

TABLE 4.7-4

## HYDRAULIC SNUBBER INSPECTION SCHEDULE

NUMBER OF SNUBBERS FOUND INOPERABLE DURING INSPECTION OR DURING INSPECTION INTERVAL (*)	NEXT REQUIRED INSPECTION INTERVAL **
0	18 months $\pm$ 25%
1	12 months $\pm$ 25%
2	6 months $\pm$ 25% #
3 or 4	124 days $\pm$ 25%
5, 6, or 7	62 days $\pm$ 25%
Greater than or equal to 8	31 days $\pm$ 25%

\* Snubbers may be categorized into two groups, "accessible" and "inaccessible". This categorization shall be based upon the snubber's accessibility for inspection during reactor operation. These two groups may be inspected independently according to the above schedule.

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

# The specified six month frequency may be waived until the end of mid-cycle outage (1991).

#### SHOLLY EVALUATION OF REQUEST:

Florida Power Corporation has reviewed the requirements of 10CFR50.92 as they relate to the proposed change to the snubber visual inspection requirements and considers the proposed change not to involve a significant hazards consideration. In support of this conclusion the following analysis is provided:

1. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated because the bulk of the support systems (e.g., rigid restraints, other snubbers, etc.) remained intact. The support components and structures are very conservatively designed; typically one failure on a particular line will not produce loads in excess of code allowable for appropriate load combinations. Snubbers are generally provided for seismic loading which is very unlikely in peninsular Florida.
2. The proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated because the change will not alter plant configuration or change parameters governing normal plant operation.
3. The proposed change will not involve a significant reduction to the margin of safety because the requirements to visually inspect 100% of the snubber population along with the required functional testing of safety-related snubbers will continue to provide adequate assurance that the snubber system will continue to be fully capable of performing its intended safety function.