

FROM: James G. Partlow
Associate Director for Projects
Office of Nuclear Reactor Regulation

SUBJECT: GENERIC LETTER 90-09

Enclosure 1 is Generic Letter 90-09 which provides guidance to licensees for a license amendment request to remove component lists from Technical Specifications (TS). Any proposal for this line-item TS improvement is voluntary.

It is intended that Project Managers will review and process proposed license amendments conforming to the guidance of the generic letter. Generally, it should not be necessary to consult or to obtain review assistance from a technical review branch unless the proposed amendment deviates from the generic letter guidance. Guidance on implementing the TS requirements for visual inspection intervals for snubber is provided in Enclosures A and B of the Generic Letter.

Enclosure 2 is a model Safety Evaluation Report (SER) that was prepared by the Mechanical Engineering Branch. This model SER should facilitate your preparation of a license amendment to implement the line-item TS improvements address in the generic letter. The Lead Project Manager for this task is James J. Raleigh. He will assist you in the preparation of NSHC pre-notice for a proposed amendment conforming to the generic letter and should be included on distribution for the amendment package.

Original signed by
James G. Partlow

James G. Partlow
Associate Director for Projects
Office of Nuclear Reactor Regulation

- Enclosures:
1. Generic Letter 90-09
2. Model SER

cc: w/enclosures:
See next page

Contact:
J. Rajan, EMEB/NRR
492-0788

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DATE	: 7/17/90	: 7/17/90	11/30/90	11/30/90	12/5/90

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MEMORANDUM FOR: All NRR Project Managers

DEC 06 1990

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Associate Director for Projects
Office of Nuclear Reactor Regulation

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OFC	:EMEB:DET*	:EMEB:DET*	:EMEB:DET	:DET:D	:ADP:NRR
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DATE	: 7/17/90	: 7/17/90	11/30/90	11/30/90	12/5/90

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NRR Division Directors

Regional Administrators



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 11, 1990

Enclosure 1

TO: ALL LIGHT-WATER REACTOR LICENSEES AND APPLICANTS

SUBJECT: ALTERNATIVE REQUIREMENTS FOR SNUBBER VISUAL INSPECTION INTERVALS AND CORRECTIVE ACTIONS (GENERIC LETTER 90-09)

Technical Specifications (TS) impose surveillance requirements for visual inspection and functional testing of all safety-related snubbers. A visual inspection is the observation of the condition of installed snubbers to identify those that are damaged, degraded, or inoperable as caused by physical means, leakage, corrosion, or environmental exposure. To verify that a snubber can operate within specific performance limits, the licensees perform functional testing that typically involves removing the snubber and testing it on a specially-designed test stand. Functional testing provides a 95 percent confidence level that 90 percent to 100 percent of the snubbers operate within the specified acceptance limits. The performance of visual examinations is a separate process that complements the functional testing program and provides additional confidence in snubber operability.

The TS specifies a schedule for snubber visual inspections that is based on the number of inoperable snubbers found during the previous visual inspection. The schedules for visual inspections and for the functional testing assume that refueling intervals will not exceed 18 months. Because the current schedule for snubber visual inspections is based only on the number of inoperable snubbers found during the previous visual inspection, irrespective of the size of the snubber population, licensees having a large number of snubbers find that the visual inspection schedule is excessively restrictive. Some licensees have spent a significant amount of resources and have subjected plant personnel to unnecessary radiological exposure to comply with the visual examination requirements.

To alleviate this situation, the staff has developed an alternate schedule for visual inspections that maintains the same confidence level as the existing schedule and generally will allow the licensee to perform visual inspections and corrective actions during plant outages. Because this line-item TS improvement will reduce future occupational radiation exposure and is highly cost effective, the alternative inspection schedule is consistent with the Commission's policy statement on TS Improvements.

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 or categories. A snubber is considered unacceptable if it fails the acceptance criteria of the visual inspection. The alternative inspection interval is based on a fuel cycle of up to 24 months and may

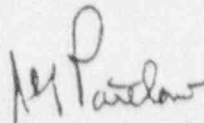
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be as long as two fuel cycles, or 48 months for plants with other fuel cycles, depending on the number of unacceptable snubbers found during the previous visual inspection.

Guidance on implementing the alternative TS requirements for visual inspection intervals is provided in Enclosures A and B. Licensees and applicants are encouraged to propose changes to their TS that are consistent with this guidance. The NRC project manager will expeditiously review conforming amendment requests for the facility. Questions on this matter should be addressed to the contact listed below or to the project manager.

This request is covered by Office of Management and Budget Clearance Number 3150-0011, which expires January 31, 1991. The estimated average number of burden hours is 40 person hours per licensee response, including searching data sources, gathering and analyzing the information, and writing the requested reports. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Information and Records Management Branch, Division of Information Support Services, Office of Information and Resources Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555; and to the Paperwork Reduction Project (3150-0011), Office of Management and Budget, Washington, DC 20503.

Sincerely,



James G. Partlow
Associate Director for Projects
Office of Nuclear Reactor Regulation

Enclosure:
As stated

Contact: Jai Rajan (301) 492-0788

ALTERNATIVE REQUIREMENTS FOR DETERMINING THE INTERVAL
FOR THE VISUAL INSPECTION OF SNUBBERS

An alternate method for determining the next interval for the visual inspection of snubbers is provided based upon the number of unacceptable snubbers found during the previous inspection, the total population or category size for each snubber type, and the previous inspection interval. A snubber is considered unacceptable if it fails to satisfy the acceptance criteria of the visual inspection. 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.

If a licensee's review and evaluation can not justify continued operation with an unacceptable snubber, the licensee shall declare the snubber inoperable and shall meet the applicable action requirements. To determine the next surveillance interval, the licensee may reclassify an unacceptable snubber as acceptable if it can be demonstrated that the snubber is operable in its as-found condition by the performance of a functional test and if it satisfies the acceptance criteria for functional testing.

The next visual inspection interval may be twice, the same, or reduced by as much as two-thirds of the previous inspection interval. This interval depends on the number of unacceptable snubbers found in proportion to the size of the population or category for each type of snubber included in the previous inspection. Table 4.7-2 in Enclosure B replaces the existing TS requirements for determining the next visual inspection interval. Generally, the existing TS requirements establish inspection intervals of 18 months (the length of a nominal fuel cycle) or a fraction thereof based on the number of inoperable snubbers of each type for the previous inspection period.

The alternative provided herein allows inspection intervals to be compatible with a 24-month fuel cycle. Also, the interval may be increased to every other refueling outage for plants on a 24-month fuel cycle or up to 48 months for plants with other fuel cycles if few unacceptable snubbers were found from the previous inspection. Table 4.7-2 establishes three limits for determining the next visual inspection interval corresponding to the population or category size for a given type of snubber. The three limits are listed in Columns A, B, and C of Table 4.7-2 for representative sizes of snubber populations or categories. For a population or category that differs from the representative size provided, the values for the limits may be found by interpolation from the limits provided in Columns A, B, and C for determining the next inspection interval. Where the limit for unacceptable snubbers in Columns A, B, or C is determined by interpolation and includes a fractional value, the limit may be reduced to the next lower integer.

The limits in columns A, B, and C of Table 4.7-2 are applied as follows to determine the next inspection interval. If the number of unacceptable snubbers is less than or equal to the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months, excluding the TS provisions to extend surveillance intervals. If the number of unacceptable snubbers is greater than the number in Column A but less than or equal to

the number in Column B, the next inspection interval shall be the same as the previous interval. If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be reduced to two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C and greater than the number in Column B, the next inspection interval shall be reduced proportionally by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers and the number in Column B to the difference between the numbers of Columns B and C.

Enclosure B is a sample of the changes that should be proposed for TS that are based upon the format of the current Standard Technical Specifications (STS). For plants that have TS in a format different from the STS, proposed TS changes should be consistent with the changes provided in Enclosure B. The changes for this alternative are underlined, and Table 4.7-2 has been added.

MODEL TECHNICAL SPECIFICATION CHANGES

SURVEILLANCE REQUIREMENTS

4.7.9 Each snubber shall be demonstrated OPERABLE by the 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 categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7-2. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7-2 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 (*).

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable 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 irrespective of type that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.9f. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next inspection interval. A review and evaluation shall be performed and documented 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.

*NRC will include the number of the license amendment that implements this change.

TABLE 4.7-2
 SNUBBER VISUAL INSPECTION INTERVAL

Population or Category (Notes 1 and 2)	NUMBER OF UNACCEPTABLE SNUBBERS		
	Column A Extend 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 than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 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.

MODEL SAFETY EVALUATION REPORT

Underscored blank spaces are to be filled in with the applicable information. The information identified in brackets should be used as applicable on a plant-specific basis.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. ___ TO FACILITY OPERATING LICENSE NFP-

AND AMENDMENT NO. ___ TO FACILITY OPERATING LICENSE NFP-
[UTILITY NAME]

DOCKET NOS. 50- AND 50-

[PLANT NAME], UNITS 1 AND 2

1.0 INTRODUCTION

By letter dated _____, 1990, [utility name] (the licensee) proposed changes to the Technical Specifications (TS) for [plant name]. It is proposed to remove the snubber visual examination schedule in the existing Technical Specifications and replace it with a refueling outage based visual examination schedule, Table 1 of the Generic Letter 90- dated _____, 1990 to all holders of operating licenses or construction permits for nuclear power reactors.

2.0 EVALUATION

The snubber visual examination schedule in the existing Technical Specification, is based on the permissible number of inoperable snubbers found during the visual examination. Because the existing snubber visual examination schedule is based only on the absolute number of inoperable snubbers found during the visual examinations irrespective of the total population of snubbers, licensee's with a large snubber population find the visual examination schedule excessively restrictive. The purpose of the alternative visual examination schedule is to allow the licensee to perform visual examinations and corrective actions during plant outages without reduction of the confidence level provided by the existing visual examination schedule. The new visual examination schedule specifies the permissible number of inoperable snubbers for various snubber populations. The basic examination interval is the normal fuel cycle upto 24 months. This interval may be extended to as long as twice the fuel cycle or reduced to as small as two-thirds of the fuel cycle depending on the number of unacceptable snubbers found during the visual examination. The examination interval may vary by ± 25 percent to coincide with the actual outage.

In the event one or more snubbers are found inoperable during a visual examination, the Limiting Conditions for Operation (LCO) in the present TS

require the licensee to restore or replace the inoperable snubber(s) to operable status within 72 hours or declare the attached system inoperable and follow the appropriate action statement for that system. This LCO will remain in the TS however the permissible number of inoperable snubber(s) and the subsequent visual examination interval will now be determined in accordance with the new visual examination schedule (Table 1 of Generic Letter 90-____ dated _____, 1990). As noted in the guidance for this line item TS improvement, certain corrective actions may have to be performed depending on the number of inoperable snubbers found. All requirements, for corrective actions and evaluations associated with the use of visual examination schedule and stated in the footnotes 1 thru 7, (Table 1 of Generic Letter 90-____) shall be included in the TS.

The licensee has proposed changes to Specification _____ that are consistent with the guidance provided in Generic Letter 90-____ for the replacement of the snubber visual examination schedule with Table 1 (including footnotes 1 thru 7) of the Generic Letter 90-____. On the basis of its review of this matter, the staff finds that the proposed changes to the TS for [plant name] Unit(s) _____ are acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

These amendments involve changes in surveillance requirements but there is no significant change in the types or increase in the amounts of any effluents that may be released offsite and there is no significant increase in individual or cumulative occupational radiation exposure. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). The basis for this determination is that the new snubber visual examination schedule would permit the license to perform visual examinations and corrective action during outages, resulting in a decrease in individual or cumulative occupational radiation exposure. Pursuant to 10 CFR 51.22.(b), no environmental assessment need be prepared in connection with the issuance of this (these) amendment(s).

4.0 CONCLUSION

The Commission's determinations that the amendment(s) involve no significant-hazards consideration, which were published in the Federal Register (5 FR _____) on _____, 199_. The Commission consulted with the State of _____. No public comments were received, and the State of _____ did not have any comments.

On the basis of the considerations discussed above, the staff concludes that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: J. Rajan, EMEB/DET

Dated: _____, 1990