

PLANT SYSTEMS

3/4.7.5 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.5 All hydraulic and mechanical snubbers shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3. OPERATIONAL CONDITIONS 4 and 5 for snubbers located on systems required OPERABLE in those OPERATIONAL CONDITIONS.

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 4.7.5.g on the attached component or declare the attached 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.

Replace a., b., and c. with Insert 1

Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these groups (inaccessible and accessible) may be inspected independently according to the schedule below. 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 hydraulic and mechanical 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:

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

Replace a, b, and c with Insert 1

| <u>No. of Inoperable Snubbers of Each Type on Any System per Inspection Period</u> | <u>Subsequent Visual Inspection Period *#</u> |
|--|---|
| 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% |

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: (1) there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or support 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 irrespective of type on that system that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specifications 4.7.5.f. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers. For those snubbers common to more than one system, the OPERABILITY of such snubbers shall be considered in assessing the surveillance schedule for each of the related systems.

d. Transient Event Inspection

An inspection shall be performed of all hydraulic and mechanical snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems within 6 months following such an event. In addition to satisfying the visual inspection criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.

* 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.

INSERT 1

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 4.7-1. The visual inspection interval for each type of snubber shall be determined base 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 .

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 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 4.7.5.f. 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.

TABLE 4.7-1
 SNUBBER VISUAL INSPECTION INTERVAL

| Population or Category (Notes 1 and 2) | 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 included 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.

ENCLOSURE 4

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
NRC DOCKETS 50-325 & 50-324
OPERATING LICENSES DPR-71 & DPR-62
REQUEST FOR LICENSE AMENDMENT
GENERIC LETTER 90-09
SNUBBER VISUAL INSPECTION INTERVALS

TECHNICAL SPECIFICATION PAGES - UNIT 2

PLANT SYSTEMS

3/4.7.5 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.5 All hydraulic and mechanical snubbers shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3. OPERATIONAL CONDITIONS 4 and 5 for snubbers located on systems required OPERABLE in those OPERATIONAL CONDITIONS.

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 4.7.5.g on the attached component or declare the attached 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.

Replace a., b., and c. with Insert 1

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 (inaccessible and accessible) may be inspected independently according to the schedule below. 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 hydraulic and mechanical 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:

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

Replace a., b., and c.
with Insert I

| <u>No. of Inoperable Snubbers of Each Type on Any System per Inspection Period</u> | <u>Subsequent Visual Inspection Period **</u> |
|--|---|
| 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% |

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: (1) there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or support 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 irrespective of type on that system that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specifications 4.7.5.f. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers. For those snubbers common to more than one system, the OPERABILITY of such snubbers shall be considered in assessing the surveillance schedule for each of the related systems.

d. Transient Event Inspection

An inspection shall be performed of all hydraulic and mechanical snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems within 6 months following such an event. In addition to satisfying the visual inspection criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting, or (3) stroking the mechanical snubber through its full range of travel.

* 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.

INSERT 1

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 4.7-1. The visual inspection interval for each type of snubber shall be determined base 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 .

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 4.7.5.f. 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.

TABLE 4.7-1
 SNUBBER VISUAL INSPECTION INTERVAL

| Population or Category (Notes 1 and 2) | 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 included 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.