

ATTACHMENT 1

Proposed Changed Pages

<u>Unit 1</u>	<u>Revision</u>
Page 3/4 7-20	Replace
Page 3/4 7-20a	Delete
Page 3/4 7-21	Replace
Page 3/4 7-22	Replace
Page 3/4 7-23	Replace
Page 3/4 7-24	Replace
Page 3/4 7-25	Replace
Page 3/4 7-26	Add
Page 3/4 7-27	Add

<u>Unit 2</u>	<u>Revision</u>
Page 3/4 7-20	Replace
Page 3/4 7-20a	Delete
Page 3/4 7-21	Replace
Page 3/4 7-22	Replace
Page 3/4 7-23	Replace
Page 3/4 7-24	Replace
Page 3/4 7-25	Replace
Page 3/4 7-26	Add
Page 3/4 7-27	Add

## PLANT SYSTEMS

### 3/4.7.9 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

3.7.9 All snubbers shall be OPERABLE. The only snubbers excluded from this requirement are those installed on nonsafety-related systems and then only if their failure or the failure of the system on which they are installed would have no adverse effect on any safety-related system.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 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 4.7.9.d on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

#### 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 4.7-3. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in Table 4.7-3 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 \_\_\_\_.

Table 4.7-3

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

TABLE NOTATION

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.

(Notes continued on Page 3/4 7-22)

Table 4.7-3 (Continued)

TABLE NOTATION

- 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.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

=====

#### 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 (i) 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 (ii) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specifications 4.7.9.e or 4.7.9.f. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable and may be reclassified as acceptable for determining the next inspection interval provided that criterion (i) and (ii) above are met. 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.

#### d. Functional tests

At least once per 18 months during shutdown, a representative sample of 88 snubbers shall be functionally tested either in place or in a bench test. If more than 3 snubbers do not meet the functional test acceptance criteria of Specifications 4.7.9.e or 4.7.9.f, an additional sample selected according to the expression  $22(a-3)$  shall be functionally tested, where  $a$  is the total number of snubbers found inoperable during the functional testing of the initial representative sample.

Functional testing shall continue according to the expression (22)b 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 have been functionally tested.

Snubbers greater than 50,000 lb. capacity may not be excluded from functional testing requirements.\*

\* This portion of the specification is not effective until the fifth refueling outage or when a commercial in-place testing device is available whichever is later.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

=====

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the initial representative sample shall include snubbers from the following three groups:

1. The first snubber away from each reactor vessel nozzle
2. Snubbers within five feet of heavy equipment (valve, pump, turbine, motor, etc.)
3. Snubbers within 10 feet of the discharge from a safety relief valve.

Snubbers that are especially difficult to remove or in high radiation zones during shutdown shall also be included in the representative sample.\* Hydraulic and mechanical snubbers may be used jointly or separately as the basis for the sampling plan.

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included for the re-sampling.

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.

---

\* 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.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

=====

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 attached component remains capable of meeting the designed service.

e. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
2. 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.

f. Mechanical Snubbers Functional Test Acceptance Criteria

The mechanical snubber functional test shall verify that:

1. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force.
2. Activation (restraining action) is achieved within the specified range in both tension and compression.
3. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

.....

g. 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.n.

Concurrent with the first inservice visual inspection and at least once per 18 months, the installation and maintenance records for each snubber 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 service life review. This reevaluation, replacement or reconditioning shall be indicated in the records.



This page intentionally left blank.

3/4 7-28 through 3/4 7-79a Deleted.

PLANT SYSTEMS

3/4.7.9 SNUBBERS

LIMITING CONDITION FOR OPERATION

=====

3.7.9 All snubbers shall be OPERABLE. The only snubbers excluded from this requirement are those installed on nonsafety-related systems and then only if their failure or the failure of the system on which they are installed would have no adverse effect on any safety-related system.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 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 4.7.9.d on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

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 4.7-3. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in Table 4.7-3 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 \_\_\_\_.

Table 4.7-3

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

TABLE NOTATION

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.

(Notes continued on page 3/4 7-22)

Table 4.7-3 (Continued)

TABLE NOTATION

- 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.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

\*\*\*\*\*

#### 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 (i) 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 (ii) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specifications 4.7.9.e or 4.7.9.f. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable and may be reclassified as acceptable for determining the next inspection interval provided that criterion (i) and (ii) above are met. 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.

#### d. Functional tests

At least once per 18 months during shutdown, a representative sample of 88 snubbers shall be functionally tested either in place or in a bench test. If more than 3 snubbers do not meet the functional test acceptance criteria of Specifications 4.7.9.e or 4.7.9.f, an additional sample selected according to the expression 22(a-3) shall be functionally tested, where a is the total number of snubbers found inoperable during the functional testing of the initial representative sample.

Functional testing shall continue according to the expression (22)b 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 have been functionally tested.

Snubbers greater than 50,000 lb. capacity may not be excluded from functional testing requirements.\*

\* This portion of the specification is not effective until the second refueling outage or when a commercial in-place testing device is available whichever is later.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

\*\*\*\*\*

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the initial representative sample shall include snubbers from the following three groups:

1. The first snubber away from each reactor vessel nozzle
2. Snubbers within five feet of heavy equipment (valve, pump, turbine, motor, etc.)
3. Snubbers within 10 feet of the discharge from a safety relief valve.

Snubbers that are especially difficult to remove or in high radiation zones during shutdown shall also be included in the representative sample.\* Hydraulic and mechanical snubbers may be used jointly or separately as the basis for the sampling plan.

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included for the re-sampling.

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.

---

\* 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.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)  
=====

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 attached component remains capable of meeting the designed service.

e. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
2. 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.

f. Mechanical Snubbers Functional Test Acceptance Criteria

The mechanical snubber functional test shall verify that:

1. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force.
2. Activation (restraining action) is achieved within the specified range in both tension and compression.
3. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

\*\*\*\*\*

g. 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.n.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, the installation and maintenance records for each snubber 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 service life review. This reevaluation, replacement or reconditioning shall be indicated in the records.



This page intentionally left blank.  
3/4 7-28 through 3/4 7-49bb Deleted.

ATTACHMENT 2

SIGNIFICANT HAZARDS EVALUATION  
PURSUANT TO 10 CFR 50.92

SIGNIFICANT HAZARDS EVALUATION PURSUANT TO  
10 CFR 50.92 FOR THE PROPOSED CHANGES TO THE  
FNP UNITS 1 AND 2 TECHNICAL SPECIFICATIONS  
REVISIONS TO SNUBBER VISUAL INSPECTION INTERVALS

PROPOSED CHANGES:

Revise the Technical Specification Section 4.7.9 concerning snubber surveillance for both units to reflect the present guidance proposed in Enclosure B of Generic Letter 90-09, Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Actions.

BACKGROUND:

The wording of Section 4.7.9 currently specifies a schedule for snubber visual inspection based on the number of inoperable snubbers found during the previous visual inspection. The schedules for visual inspections 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 NRC staff developed an alternate schedule for visual inspections that maintains the same confidence level as the existing schedule and generally allows the licensee to perform visual inspections and corrective actions during plant outages. This technical specification revision will reduce future occupational radiation exposure and is highly cost effective. This alternate inspection schedule as identified in Attachment B of Generic Letter 90-09 is consistent with the Commission's Policy Statement on Technical Specification Improvements. Revisions to the wording of the Generic Letter 90-09 proposed technical specifications were made to maintain consistency with the current FNP technical specification definition of snubber categorization and disposition of visual failures.

ANALYSIS:

Alabama Power Company has reviewed the requirements of 10 CFR 50.92 as they relate to the incorporation of the alternate inspection schedule for snubber visual inspection intervals and considers these changes not to involve a significant hazards consideration. In support of this conclusion, the following analysis is provided:

- (1) The proposed changes will not involve a significant increase in the probability or consequences of an accident previously evaluated. No physical change to the facility or its operating parameters is being made. The proposed changes were developed by the NRC Staff and maintain the same confidence level as the existing visual snubber inspection schedule as specified within Generic Letter 90-09. For these reasons, the response of the plant to previously evaluated accidents will remain unchanged.

- (2) The proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated. Since no change is being made to degrade the design, operation, or maintenance of the plant, a new mode of failure is not created. Therefore, a new or different kind of accident will not occur as a result of these changes.
- (3) The proposed changes do not involve a significant reduction in a margin of safety. The Surveillance Requirements set forth in Generic Letter 90-09 as alternate requirements for snubber visual inspection intervals were developed by the NRC Staff and, as addressed in Generic Letter 90-09 (including FNP's revisions), maintain the same confidence level as the present requirements. Therefore, incorporating the suggested Surveillance Requirements from Generic Letter 90-09 will not reduce any margin of safety.

#### CONCLUSION:

Based upon the analysis provided herein, Alabama Power Company has determined that the proposed change to the technical specifications will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. Therefore, Alabama Power Company has determined that the proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve a significant hazards consideration.