

## SURVEILLANCE REQUIREMENTS (Continued)

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 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).

or

(that number of snubbers which follows the expression  $35 \left[ 1 + \frac{c}{2} \right]$

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

\*The value "c" is arbitrary but will be chosen and documented in the plant procedure for performing the functional testing prior to each functional test. If the value of "c" for either unit is changed from its previous functional test value, the Regional Administrator, USNRC, Region II will be formally notified prior to performance of the test with a revised value for "c". 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 snubbers 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 functional test, there will be 35 snubbers in the representative sample and 280 snubbers required for testing in the re-sample.

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