

ATTACHMENT IV  
PROPOSED TECHNICAL SPECIFICATION CHANGES

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

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## PLANT SYSTEMS

### 3/4.7.8 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

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3.7.8 All snubbers shall be OPERABLE. The only snubbers excluded from the requirement are those installed on nonsafety-related systems and then only if their failure or 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 on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.8g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

#### SURVEILLANCE REQUIREMENTS

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4.7.8 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and 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

Insert A

~~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 are found OPERABLE during the first inservice visual inspection, the second inservice visual inspection of that type shall be performed at the first refueling outage. Otherwise, subsequent visual inspections of a given type shall be performed in accordance with the following schedule:~~

**Insert A**

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 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 ( ).

\*NRC to include the number of the license amendment that implements this change

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

<del>No. of Inoperable Snubbers of Each Type per Inspection Period</del>	<del>Subsequent Visual Inspection Period*#</del>
<del>0</del>	<del>18 months <math>\pm</math> 25%</del>
<del>1</del>	<del>12 months <math>\pm</math> 25%</del>
<del>2</del>	<del>6 months <math>\pm</math> 25%</del>
<del>3, 4</del>	<del>124 days <math>\pm</math> 25%</del>
<del>5, 6, 7</del>	<del>62 days <math>\pm</math> 25%</del>
<del>8 or more</del>	<del>31 days <math>\pm</math> 25%</del>

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: (1) there are no visible indications of damage or impaired OPERABILITY, and (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are functional. 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 that may be generically susceptible; or (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.8f. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.~~ Insert B

shall be classified as unacceptable and may be reclassified acceptable

d. Transient Event Inspections

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 acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; (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 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.~~

~~#The provisions of Specification 4.0.2 are not applicable.~~

**Insert B**

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 determine system operability with an unacceptable snubber. If operability cannot be justified, the system shall be declared inoperable and the ACTION requirements shall be met.

Insert C

(Table 4.7-2 should be inserted in front of Figure 4.7-1)

TABLE 4.7-2  
SNUBBER VISUAL INSPECTION INTERVAL

Population per Category (Notes 1 and 2)	NUMBER OF UNACCEPTABLE SNUBBERS		
	Column A Extend Interval (Notes 3 and 5)	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 category 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, categories must be determined and documented before any inspection and that determination shall be the basis upon which to determine the next inspection interval for that category.

Note 2: Interpolation between population per category and the number of unacceptable snubbers is permissible. Use next lower integer for the value of the limit for Columns A, B, and C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

Insert C (con't)

Table 4.7-2 (Continued)  
SNUBBER VISUAL INSPECTION INTERVAL

- 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 Column B and C.
- Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.