

ENCLOSURE 3

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS 4.7.8b AND 4.7.8c
INSTRUCTIONS FOR INCORPORATION

The proposed change to the Vogtle Unit 1 and Unit 2 Technical Specifications would be incorporated as follows:

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PLANT SYSTEMS

3/4.7.8 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.8 All snubbers shall be OPERABLE. The only snubbers excluded from the requirements 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

4.7.8 Each snubber shall be demonstrated OPERABLE by 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, respective 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 category 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 ___ and ___ for Vogtle Units 1 and 2, respectively.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

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 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 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 4.7.8f. 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 criteria (1) and (2) 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. Transient Event Inspection

An inspection shall be performed of all 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; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.

e. Functional Tests

During the first refueling shutdown and at least once per 18 months thereafter during shutdown, a representative sample of snubbers of each type shall be tested using one of the following sample plans. The sample plan for each type shall be selected prior to the test period and cannot be changed during the test period. The NRC Regional Administrator shall be notified in writing of the sample plan selected for each snubber type prior to the test period or the sample plan used in the prior test period shall be implemented:

- 1) At least 10% of the total of each type of snubber shall be functionally tested either in-place or in a bench test. For each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.8f., an additional 10% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested; or

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 18 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.

TABLE 4.7-2 (Continued)

SNUBBER VISUAL INSPECTION 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

BASES

SNUBBERS (Continued)

Nuclear Regulatory Commission (NRC) Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated December 11, 1990, provides an alternate method for determining the next interval for the visual inspection of snubbers from that to which the plant was originally licensed. The original schedule for snubber visual inspection was based only on the number of inoperable snubbers found during the previous visual inspection, irrespective of the size of the snubber population. As a result, plants having a large number of snubbers found the original inspection schedule to be excessively restrictive. Significant resources, including subjecting plant personnel to unnecessary radiological exposure, were expended in order to comply with the visual inspection requirements. The alternate schedule provided by NRC Generic Letter 90-09 maintains the same confidence level as that to which the plant was originally licensed and generally allows for the performance of visual inspections and any corrective actions during plant outages. Incorporated herein as Table 4.7-2, "Snubber Visual Inspection Interval," the alternate inspection schedule is based upon the number of unacceptable snubbers found during the previous inspection in proportion to the size of various snubber populations or categories. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. The categories may be inspected separately or jointly. However, categorization and inspection thereof must be made and documented prior to any inspection and that decision will constitute the basis for determining the next inspection interval for that category. A snubber is considered unacceptable if it fails to satisfy the acceptance criteria for the visual inspection. If review and evaluation cannot justify continued operation with an unacceptable snubber, the snubber shall be declared inoperable and the applicable ACTION requirements shall be met. To determine the next inspection interval, the unacceptable snubber may be reclassified 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 inspection interval may be twice, the same, or reduced to as much as two-thirds of the previous inspection interval and is contingent upon the number of unacceptable snubbers found in proportion to the population or category for each type of snubber included in the previous inspection. While the original inspection schedule requirements established 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 alternate method allows inspection intervals to be compatible with a 24-month fuel cycle. 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 are found from the previous inspection. Table 4.7-2 establishes limits for determining the next inspection interval and is consistent with the guidance provided in NRC Generic Letter 90-09.

PLANT SYSTEMS

BASES

SNUBBERS (Continued)

The acceptance criteria are to be used in the visual inspection to determine OPERABILITY of the snubbers. For example, if a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be counted as unacceptable and may be reclassified as acceptable for determining the next visual inspection interval provided that certain criteria in Specification 4.7.8c are met. A review and evaluation shall be performed and documented to justify continued operation with the unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

To provide assurance of snubber functional reliability, one of three functional testing methods is used with the stated acceptance criteria:

1. Functionally test 10% of a type of snubber with an additional 10% tested for each functional testing failure, or
2. Functionally test a sample size and determine sample acceptance or rejection using Figure 4.7-1, or
3. Functionally test a representative sample size and determine sample acceptance or rejection using the stated equation.

Figure 4.7-1 was developed using "Wald's Sequential Probability Ratio Plan" as described in "Quality Control and Industrial Statistics" by Acheson J. Duncan.

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubbers for the applicable design conditions at either the completion of their fabrication or at a subsequent date. Snubbers so exempted shall be listed in the list of individual snubbers indicating the extent of the exemptions.