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3.0 SURVEILLANCE REQUIREMENTS

3.3 Reactor Coolant System and Other Components Subject to ASME XI Boiler & Pressure Vessel Code Inspection and Testing Surveillance

Applicability

Applies to in-service surveillance of primary system components and other components subject to inspection and testing according to ASME XI Boiler & Pressure Vessel Code.

Objective

To ensure the integrity of the reactor coolant system and other components subject to inspection and testing according to ASME XI Boiler & Pressure Vessel Code.

Specifications

- (1) Surveillance of the ASME Code Class 1, 2 and 3 systems, except the steam generator tubes inspection, should be covered by ASME XI Boiler & Pressure Vessel Code.
 - a. In-service inspection of ASME Code Class 1, Class 2, and Class 3 components and in-service testing of ASME Code Class 1, Class 2, and Class 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a (g)(6)(i).
 - b. Surveillance of the reactor coolant pump flywheels shall be performed as indicated in Table 3-6.
 - c. A surveillance program to monitor radiation-induced changes in the mechanical and impact properties of the reactor vessel materials shall be maintained in accordance with 10 CFR Part 50 Appendix H.⁽¹⁾ ~~The specimen-removal schedule shall be as indicated in Table 3-7.~~
- (2) Surveillance of Reactor Coolant System Pressure Isolation Valves
 - a. Periodic leakage testing* on each valve listed in Table 2-9 shall be accomplished prior to entering the power operation mode every time the plant is placed in the cold shutdown

* To satisfy ALARA requirements, leakage may be measured indirectly (as from the performance of pressure indicators) if accomplished in accordance with approved procedures and supported by computations showing that the method is capable of demonstrating valve compliance with the leakage criteria.

TABLE 3-6

REACTOR COOLANT PUMP SURVEILLANCE

<u>REQUIREMENT</u>	<u>METHOD</u>	<u>FREQUENCY</u>
1.1 Reactor Coolant Pump Flywheels	Visual inspection of upper surface of top disc and bottom surface of bottom disc; volumetric inspection from circumference of all disc segments.	When motor is disassembled for maintenance purposes.

TABLE 3-7CAPSULE REMOVAL SCHEDULE

<u>REMOVAL SEQUENCE</u>	<u>REFUELING SCHEDULE EFPY**</u>	<u>CAPSULE REMOVED</u>
1	2.4	225°
2	5.9	265°
3	15	275°
4	20	45°
5	21	85°
6	27	95°
7	32	225°*
8	Standby	265°*

*-----Replacement capsule assemblies were installed in the 225° and 265° locations following early removal of the 265° capsule. These capsules benchmark the change in core loading design initiated at 5.9 EFPY.

**-----Based on a rated power level of 1500 MWt.

(32) At least once per 18 months during shutdown and subject to the conditions below:

- (a) A representative sample (88) of hydraulic snubbers shall be functionally tested either in-place or in a bench test.

3.0 SURVEILLANCE REQUIREMENTS

3.14 Shock Suppressors (Snubbers)

Applicability

This specification applies to all safety-related snubbers.

Specifications

- (1) All hydraulic snubbers whose seal material has been demonstrated by operating experience, lab testing or analysis to be compatible with the operating environment shall be visually inspected. As used in this specification, "type of snubber" shall mean snubbers of the same design and manufacturer, irrespective of capacity. This inspection shall include, but not necessarily be limited to, inspection of the hydraulic fluid reservoir, fluid connections, and linkage connections to the piping and anchor to verify snubber operability. In those locations where snubber movement can be manually induced without disconnecting the snubber, verify that the snubber has freedom of movement and is not frozen up. 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 functional testing acceptance criteria. 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. Visual inspections shall be performed in accordance with the following schedule: Table 3-14.

<u>Number of Hydraulic Snubbers Found Inoperable During Inspection or During Inspection Interval</u>	<u>Next Required Inspection Interval</u>
0	18 months \pm 25%
1	12 months \pm 25%
2	6 months \pm 25%
3, 4	124 days \pm 25%
5, 6, 7	62 days \pm 25%
\geq 8	31 days \pm 25%

The required inspection interval shall not be lengthened more than one step at a time.

Snubber may be categorized in two groups, "accessible" or "inaccessible", based on their accessibility for inspection during reactor operation. These two groups may be inspected independently according to the above schedule.

- (2) All hydraulic snubbers whose seal materials are other than ethylene propylene or other material that has been demonstrated to be compatible with the operating environment shall be visually inspected for operability every 31 days.

3.0 SURVEILLANCE REQUIREMENTS
3.14 Shock Suppressors (Snubbers) (Continued)

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., is frozen in place, the cause will be evaluated. If the cause is a manufacturer or design deficiency, appropriate action shall be taken for snubbers of the same design subject to the same defect to determine if any more defects exist. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test acceptance criteria.

For any snubber(s) found locked up during normal operation or found inoperable following a seismic event, 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 supported component remains capable of meeting the designed service. If the engineering evaluation shows the components to be capable of meeting the designed service without the failed snubber, that snubber may be deleted from service per Specification 2.18(4).

(43) 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 5.10.2.m. At least once per 18 months the installation and maintenance record 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 re-evaluated 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 re-evaluation, replacement or reconditioning shall be indicated in the records.

Basis

All safety snubbers shall be operable to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on non-safety-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.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. ~~Therefore~~ The required inspection interval will be based on Table 3-14, varies inversely with the observed snubber failures and is determined by the---

3.0 SURVEILLANCE REQUIREMENTS
3.14 Shock Suppressors (Snubbers) (Continued)

~~number of inoperable snubbers found during an inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.~~

When a snubber is found locked up or frozen in place or when a snubber has been inoperable during a seismic event, an engineering evaluation shall be performed, in addition to the determination of the snubber mode of failure. The purpose of the engineering evaluation is to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 18 month intervals. Selection of a representative sample of hydraulic snubbers according to the expression $35(1+c/2)$ provides a confidence level of approximately 95% that 90% to 100% of the snubbers in the plant will be operable within acceptance limits. The District selected the value of c to be 3. Observed failures of these sample snubbers shall require functional testing of additional units. For each number of snubbers above c which does not meet the functional test acceptance criteria, an additional sample selected according to the expression $35(1+c/2)(2/(c+1))^2(a-c)$ will be functionally tested, where a is the total number of snubbers found inoperable during the functional testing of the representative sample. Functional testing will continue according to the expression $b(35(1+c/2)(2/(c+1))^2)$ where b is the number of snubbers found inoperable in the previous resample, until no additional inoperable snubbers are found within a sample or until all snubbers have been functionally tested.

A "10%" criterion is utilized for mechanical snubbers because of the considerably smaller number of mechanical snubbers.

Hydraulic snubbers and mechanical snubbers will each be treated as a different entity for the above surveillance programs.

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (e.g. newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

TABLE 3-14
SNUBBER VISUAL INSPECTION INTERVAL
NUMBER OF UNACCEPTABLE SNUBBERS

<u>Population</u> (Notes 1 and 2)	<u>Column A</u> <u>Extend Interval</u> (Note 3)	<u>Column B</u> <u>Repeat Interval</u> (Note 4)	<u>Column C</u> <u>Reduce Interval</u> (Note 5)
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

Note 1: The next visual inspection interval for a snubber population shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. 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 . 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 up to a 48 month interval.

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.

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3.0 **SURVEILLANCE REQUIREMENTS**

3.3 **Reactor Coolant System and Other Components Subject to ASME XI Boiler & Pressure Vessel Code Inspection and Testing Surveillance**

Applicability

Applies to in-service surveillance of primary system components and other components subject to inspection and testing according to ASME XI Boiler & Pressure Vessel Code.

Objective

To ensure the integrity of the reactor coolant system and other components subject to inspection and testing according to ASME XI Boiler & Pressure Vessel Code.

Specifications

- (1) Surveillance of the ASME Code Class 1, 2 and 3 systems, except the steam generator tubes inspection, should be covered by ASME XI Boiler & Pressure Vessel Code.
 - a. In-service inspection of ASME Code Class 1, Class 2, and Class 3 components and in-service testing of ASME Code Class 1, Class 2, and Class 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a (g)(6)(i).
 - b. Surveillance of the reactor coolant pump flywheels shall be performed as indicated in Table 3-6.
 - c. A surveillance program to monitor radiation-induced changes in the mechanical and impact properties of the reactor vessel materials shall be maintained in accordance with 10 CFR Part 50 Appendix H.⁽¹⁾
- (2) Surveillance of Reactor Coolant System Pressure Isolation Valves
 - a. Periodic leakage testing on each valve listed in Table 2-9 shall be accomplished prior to entering the power operation mode every time the plant is placed in the cold shutdown

* To satisfy ALARA requirements, leakage may be measured indirectly (as from the performance of pressure indicators) if accomplished in accordance with approved procedures and supported by computations showing that the method is capable of demonstrating valve compliance with the leakage criteria.

TABLE 3-6

REACTOR COOLANT PUMP SURVEILLANCE

	<u>REQUIREMENT</u>	<u>METHOD</u>	<u>FREQUENCY</u>
1.1	Reactor Coolant Pump Flywheels	Visual inspection of upper surface of top disc and bottom surface of bottom disc; volumetric inspection from circumference of <u>all</u> disc segments.	When motor is dis- assembled for maintenance purposes.

3.0 SURVEILLANCE REQUIREMENTS

3.14 Shock Suppressors (Snubbers)

Applicability

This specification applies to all safety-related snubbers.

Specifications

- (1) All hydraulic snubbers shall be visually inspected. As used in this specification, "type of snubber" shall mean snubbers of the same design and manufacturer, irrespective of capacity. This inspection shall include, but not necessarily be limited to, inspection of the hydraulic fluid reservoir, fluid connections, and linkage connections to the piping and anchor to verify snubber operability. In those locations where snubber movement can be manually induced without disconnecting the snubber, verify that the snubber has freedom of movement and is not frozen up. 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 functional testing acceptance criteria. 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. Visual inspections shall be performed in accordance with Table 3-14.
- (2) At least once per 18 months during shutdown and subject to the conditions below:
 - (a) A representative sample (88) of hydraulic snubbers shall be functionally tested either in-place or in a bench test.

3.0 SURVEILLANCE REQUIREMENTS
3.14 Shock Suppressors (Snubbers) (Continued)

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., is frozen in place, the cause will be evaluated. If the cause is a manufacturer or design deficiency, appropriate action shall be taken for snubbers of the same design subject to the same defect to determine if any more defects exist. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test acceptance criteria.

For any snubber(s) found locked up during normal operation or found inoperable following a seismic event, 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 supported component remains capable of meeting the designed service. If the engineering evaluation shows the components to be capable of meeting the designed service without the failed snubber, that snubber may be deleted from service per Specification 2.18(4).

(3) 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 5.10.2.iii. At least once per 18 months the installation and maintenance record 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 re-evaluated 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 re-evaluation, replacement or reconditioning shall be indicated in the records.

Basis

All safety snubbers shall be operable to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on non-safety-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.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. The required inspection interval will be based on Table 3-14.

3.0 SURVEILLANCE REQUIREMENTS
3.14 Shock Suppressors (Snubbers) (Continued)

When a snubber is found locked up or frozen in place or when a snubber has been inoperable during a seismic event, an engineering evaluation shall be performed, in addition to the determination of the snubber mode of failure. The purpose of the engineering evaluation is to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 18 month intervals. Selection of a representative sample of hydraulic snubbers according to the expression $35(1+c/2)$ provides a confidence level of approximately 95% that 90% to 100% of the snubbers in the plant will be operable within acceptance limits. The District selects the value of c to be 3. Observed failures of these sample snubbers shall require functional testing of additional units. For each number of snubbers above c which does not meet the functional test acceptance criteria, an additional sample selected according to the expression $35(1+c/2)(2/(c+1))^2(a-c)$ will be functionally tested, where a is the total number of snubbers found inoperable during the functional testing of the representative sample. Functional testing will continue according to the expression $b(35(1+c/2)(2/(c+1))^2)$ where b is the number of snubbers found inoperable in the previous resample, until no additional inoperable snubbers are found within a sample or until all snubbers have been functionally tested.

A "10%" criterion is utilized for mechanical snubbers because of the considerably smaller number of mechanical snubbers.

Hydraulic snubbers and mechanical snubbers will each be treated as a different entity for the above surveillance programs.

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (e.g., newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

TABLE 3-14
SNUBBER VISUAL INSPECTION INTERVAL
NUMBER OF UNACCEPTABLE SNUBBERS

<u>Population</u> (Notes 1 and 2)	<u>Column A</u> <u>Extend Interval</u> (Note 3)	<u>Column B</u> <u>Repeat Interval</u> (Note 4)	<u>Column C</u> <u>Reduce Interval</u> (Note 5)
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

Note 1: The next visual inspection interval for a snubber population shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. 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 . 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 up to a 48 month interval.

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.

ATTACHMENT B

DISCUSSION, JUSTIFICATION AND NO SIGNIFICANT HAZARDS CONSIDERATIONS

Omaha Public Power District (OPPD) is proposing to change Fort Calhoun Station Unit No. 1 Technical Specification 3.3(1)c. to implement Generic Letter 91-01 concerning vessel specimen withdrawal schedules and Specification 3.14 concerning snubber visual inspection testing to implement Generic Letter 90-09.

DISCUSSION

Specification 3.3 "Reactor Coolant System and Other Components Subject to ASME XI Boiler & Pressure Vessel Code Inspection and Testing Surveillance."

Specification 3.3(1)c. is being revised to delete the discussion concerning specimen removal schedule and Table 3-7, which delineates the specimen removal schedule, is also being deleted. In addition, the table is being deleted from the table of contents to reflect its deletion from the Technical Specifications.

Generic Letter 91-01 sets forth guidance on removing the schedule from the Technical Specifications. The Generic Letter states that:

1. To ensure that the surveillance specimens are withdrawn at the proper time, the surveillance requirements in the Technical Specification must indicate that the specimens shall be removed and examined to determine changes in their material properties as required by 10 CFR Part 50 Appendix H.

Specification 3.3(1)c. has been revised to reflect this requirement.

2. Licensees should include an updated bases section for this Technical Specification if changes to the bases are necessary to remove references to the table being removed.

The applicable Limiting Condition for Operation for reactor coolant heatup and cooldown is Specification 2.1.2. The basis to this specification includes a detailed description for the bases of the limitations and surveillance requirements. The basis does not reference either Specification 3.3 or Table 3-7, therefore no changes are necessary.

3. Licensees should commit to maintain the NRC-approved version of the specimen withdrawal schedule in the Updated Safety Analysis Report (USAR).

The NRC-approved specimen withdrawal schedule for Fort Calhoun is currently maintained in USAR Table 4.5-4. This table is included in USAR Section 4.5.3 which is discussed in the basis to Specification 2.1.2.

Therefore, the proposed change follows the guidance contained in Generic Letter 91-01.

Specification 3.14 "Shock Suppressors (Snubbers)"

Specification 3.14 is being revised to incorporate the guidance contained in Generic Letter 90-09. This Generic Letter provides guidance on changing the method of selection for visual examinations of snubbers that maintains a 95 percent confidence level that 90 to 100 percent of the snubbers operate within the specified acceptance limits.

The following is a discussion of changes to Specification 3.14 and any differences from the model standard technical specifications transmitted in the Generic Letter.

Snubber Visual Inspection Interval Table

Only that portion of the table in the Model Technical Specifications that currently applies, or might apply to Fort Calhoun in the future, is proposed. The current total snubber population at Fort Calhoun is approximately 450. It is proposed that the requirements for populations of 1 - 750 be included which allows future flexibility in any reductions or increases in population.

Note 3 is being reworded to restate "not greater than a 48 month interval" to "up to a 48 month interval." Fort Calhoun does not have explicitly stated exceptions to the 25 percent extensions allowed for surveillances. In general Fort Calhoun interprets the 25 percent extension to not be applicable if a surveillance states the interval is "not to exceed" or "shall not be greater than." Therefore, Note 3 is being reworded to reflect this interpretation.

Note 6 is not necessary. Specification 2.0.1 provides for a 25 percent extension on each surveillance. This specification applies to all surveillances unless stated in a particular Surveillance Requirement. The 3.25 limit for performing three consecutive surveillances was deleted from the Fort Calhoun Technical Specifications in Amendment 129 following the guidance of Generic Letter 89-14.

Basis

The basis of Specification 3.14 is being revised to indicate that the selection criteria for visual inspections are in accordance with Table 3-14.

Other Changes in addition to Generic Letter 90-09 Changes

Specification 3.14(2)

Specification 3.14(2) is being deleted as it is no longer required. Specification 3.14(2) was incorporated into the Technical Specifications by Amendment 27. This was in response to Regulatory Operations Bulletin 73-04 dated August 17, 1973 concerning inadequacies in Bergen-Paterson hydraulic shock suppressors (snubbers). This Bulletin required licensees to inspect snubbers for leaks and additional information was transmitted to licensees in a letter dated October 26, 1973, stating that reinspections of snubbers should occur every 30 days for incompatible seal material. The seals made of incompatible material have since been replaced with seals of compatible material; therefore, this Specification is no longer required.

Basis

A typographical error is being corrected in the formula to calculate the re-sample population. The formula as stated is:

$$b(35(1 + c/a)(2/(c + 1))^2)$$

The correct formula as stated in the Standard Technical Specifications is:

$$b(35(1 + \underline{c/2})(2/(c + 1))^2)$$

This formula is being corrected by replacing c/a with the correct expression $c/2$.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION:

The proposed changes do not involve a significant hazards consideration because operation of Fort Calhoun Station Unit 1 in accordance with these changes would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes to Specification 3.14 concerning the selection criteria for the visual inspection of snubbers do not affect the 95 percent probability that 90 to 100 percent of the snubbers will perform within established acceptance criteria established by the functional testing of the snubbers. Visual inspections are a separate process that complements the functional testing program and provides additional confidence in snubber operability. The proposed changes reflect a selection criteria for conducting the visual testing as stated in NRC Generic Letter 90-09 based on the number of inoperable snubbers found during the previous visual inspection. Therefore this change does not increase the probability or consequences of any accident previously evaluated.

The proposed changes to Specification 3.3 are administrative in nature which follow the guidance as specified in Generic Letter 91-01. Generic Letter 91-01 states that Section II.B.3 of Appendix H to 10 CFR Part 50 requires the submittal to, and approval by, the NRC of a proposed withdrawal schedule for material specimens before implementation. Hence, the placement of this schedule in the Technical Specifications duplicates the controls on changes to this schedule that have been established by Appendix H. Therefore this duplication is unnecessary and the proposed change will not increase the probability or consequences of any accident previously evaluated.

- (2) Create the possibility of a new or different kind of accident from any previously analyzed.

It has been determined that no new or different kind of accident will be possible due to these proposed changes. No new or different modes of operation are proposed for the plant as a result of these proposed changes. Therefore, no new or different kind of accident from any previously analyzed is possible.

- (3) Involve a significant reduction in a margin of safety.

The proposed changes do not involve any reduction in a margin of safety. The proposed changes to Specification 3.3 delete a duplicate requirement of Appendix H to 10 CFR Part 50, therefore no changes in the actual material specimen withdrawal program is proposed. The proposed changes to Specification 3.14 reflect a selection criteria for conducting visual inspections of snubbers as stated in NRC Generic

Letter 90-09 based on the number of inoperable snubbers found during the previous visual inspection. The proposed changes do not affect the level of confidence that snubbers will perform within established acceptance criteria established by the functional testing. Therefore, the proposed changes will not reduce any margin of safety.

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards consideration. Example (i) relates to a purely administrative change to Technical Specifications: for example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature.

The proposed change to Specification 3.3(1) described above is similar to Example (i) in that a duplicate requirement of Section II.B.3 of Appendix H to 10 CFR Part 50 is being deleted. The changes proposed to Specification 3.14 are consistent with the selection criteria contained in Generic Letter 90-09. The proposed changes will maintain the present confidence level for the operability of snubbers.

Therefore based on the above considerations, it is OPPD's position that this proposed amendment does not involve a significant hazards consideration as defined by 10 CFR 50.92 and the proposed changes will not result in a condition which significantly alters the impact of the Station on the environment. Thus, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(e)(9) and pursuant to 10 CFR 51.22(b) no environmental assessment need be prepared.