

Docket No. 50-336  
B13973

Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Proposed Change to Technical Specifications  
Generic Letter 90-09, Snubber Visual Inspection Intervals

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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 within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.8.d on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for the system.

#### SURVEILLANCE REQUIREMENTS

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

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 type 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 \_\_\_\_.

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 (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type

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### SURVEILLANCE REQUIREMENT (Continued)

that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.8.e or 4.7.8.f, as applicable. 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.

#### d. Snubber Tests

At least once per eighteen (18) months during shutdown, a representative sample (10% of the total of each type of snubber, mechanical and hydraulic, except steam generator hydraulic snubbers in use in the plant) shall be tested either in place or in a bench test. For each snubber that does not meet the test acceptance criteria of Specification 4.7.8.e or 4.7.8.f, as applicable, an additional 5% of that type of snubber shall be tested.

Testing shall continue until no additional inoperable snubbers are found within a sample or until all snubbers have been tested. The representative sample selected for testing shall include the various configurations, and the range of size and capacity of snubbers.

Snubbers identified as "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative sample.\*

In addition to the regular sample, in locations where snubbers had failed the previous test due to operational or environmental conditions (excessive vibration, water hammer, high radiation, extreme heat or humidity, etc.), the snubbers currently installed in these locations shall be tested during the next test period. Test results of these snubbers may not be included for the resampling. All replacement snubbers shall have been tested prior to installation.

All steam generator hydraulic snubbers shall be tested and refurbished every seven years or less in accordance with the preventative maintenance program, in lieu of the functional test requirements of this specification.

\*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.

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### SURVEILLANCE REQUIREMENT (Continued)

If any snubber selected for testing either fails to lock-up or fails to move (i.e., frozen in place), the cause will be evaluated and if caused by manufacturer design deficiency, all snubbers of the same design subject to the same defect shall be tested regardless of location or difficulty or removal. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the test acceptance criteria.

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 supported 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.

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 of velocity or acceleration in both tension and compression.

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.h

\*Mechanical snubber functional test acceptance criteria shall become effective upon installation of snubber testing equipment but not later than June 30, 1985.

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SURVEILLANCE REQUIREMENT (Continued)

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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 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.

TABLE 4.7-3  
SNUBBER VISUAL INSPECTION INTERVAL

Population or Category (Notes 1 and 2)	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

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, that decision must be made and documented before any inspection and that decision shall be used 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 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.