

ATTACHMENT 2

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

TECHNICAL SPECIFICATION CHANGES

List of Attached Pages

Units 2 and 3

via
234a
234b
234t
234u
236a

PBAPS
LIST OF TABLES

<u>Table</u>	<u>Title</u>	<u>Page</u>
4.8.3.c	Maximum Values for Minimum Detectable Levels of Activity	216d-6
4.11.D-1	Snubber Visual Inspection Interval	234t
3.14.C.1	Fire Detectors	240k

PBAPS
LIST OF TABLES

<u>Table</u>	<u>Title</u>	<u>Page</u>
4.8.3.c	Maximum Values for Minimum Detectable Levels of Activity	216d-6
4.11.D-1	Snubber Visual Inspection Interval	234t
3.14.C.1	Fire Detectors	240k

via

LIMITING CONDITIONS FOR OPERATIONSURVEILLANCE REQUIREMENTS

3.11.D

Shock Suppressors (Snubbers)
on Safety Related Systems

4.11.D

Shock Suppressors (Snubbers)
on Safety Related Systems

3.11.D.1

During all modes of operation all snubbers on safety-related systems shall be operable except as noted in 3.11.D.2 and 3.11.D.3 below. Snubbers on non-safety related systems are excluded from this requirement if their failure or failure of the system on which installed has no adverse effect on a safety-related system.

4.11.D.1

Snubbers required to be operable under the provisions of 3.11.D.1 shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.6.G.

3.11.D.2

During operation in the cold shutdown or refueling modes, snubbers located on systems required to be operable shall be operable except as noted in 3.11.D.3.

4.11.D.2

Snubbers required to be operable under the provisions of 3.11.D.1 shall be visually inspected according to the schedule determined by Table 4.11.D-1. The visual inspection interval for each category shall be determined based upon criteria provided in Table 4.11.D-1 and the first inspection interval determined by using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before amendment (NRC will include the number of license amendment that implements this change).

3.11.D.3

With one or more snubbers inoperable under the requirements of 3.11.D.1, within 72 hours, replace or restore the inoperable snubber to the operable status and perform an engineering evaluation per specification 4.11.D.6. If these requirements cannot be met, declare the supported system inoperable and follow the applicable Limiting Condition for Operation for that System.

Snubbers 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 Table 4.11.D-1.

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With one or more snubbers inoperable under the requirements of 3.11.D.1, within 72 hours, replace or restore the inoperable snubber to the operable status and perform an engineering evaluation per specification 4.11.D.6. If these requirements cannot be met, declare the supported system inoperable and follow the applicable Limiting Condition for Operation for that System.

Snubbers 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 Table 4.11.D-1.

4.11.D.3

Visual inspection of snubbers required to be operable under the provisions of 3.11.D.1 shall verify that 1) there are no indications of damage or impaired operability, 2) attachments to the foundations 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 to be 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, providing that 1) the cause of the rejection is clearly established and remedied for that particular snubber and for other generically susceptible snubbers; and 2) the affected snubber is functionally tested in the as found condition and determined operable per Specification 4.11.D.7 or 4.11.D.8, 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 Limiting Conditions for Operation shall be met.

4.11.D.4

Functional Test

a) Once each operating cycle, during shutdown, a representative sample of 10% of each type of (mechanical or hydraulic) snubber required to be operable under the provisions of 3.11.D.1 shall be functionally tested either in place or in a bench test. For every unit found to be inoperable an additional 10% of that type of snubber shall be functionally tested until no more failures are found or all snubbers of that type have been tested. The functional test requirements for mechanical

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TABLE 4.11.C-1
 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 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.

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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 Section 1.0 ("Definitions") are applicable for all inspection intervals up to and including 48 months.

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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4.11 BASESB. Alternate Heat Sink Facility

No surveillance requirement other than a monthly level check is expressed for the alternate heat sink since the associated equipment surveillance testing is conducted as required by Specification 3.9.

C. Emergency Shutdown-Control Panels

Once per week verification of the panels being properly secured is considered adequate. The associated equipment is proven operable during surveillance testing of that equipment. An operability verification by electrical test at each refueling outage is adequate to assure that the panels are available and can perform their design function.

D. Shock Suppressors (Snubbers) on Safety Related Systems

All safety related snubbers shall be, as a minimum, visually inspected to verify that (1) the snubber has no visible indications of damage or impaired operability, (2) attachments to the foundation or supporting structure are functional, (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional, and (4) proper hydraulic fluid level for hydraulic snubbers. Snubbers are categorized into two groups, "accessible" or "inaccessible", based on their accessibility for inspection during reactor operation and drywell inertment. As discussed in Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions", the method for determining the next interval for the visual inspection of snubbers is provided based upon the number of unacceptable snubbers found during the previous inspection, the total population or category size and the previous inspection interval. A snubber is considered unacceptable if it fails to satisfy the acceptance criteria of the visual inspection. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. 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 will only be used to shorten the required interval and not to lengthen it.

When a snubber is found inoperable an engineering evaluation is performed to determine (a) snubber mode of failure and, (b) if there is any adverse effect or degradation on the supported piping or equipment due to the failure.

To further increase the assurance of snubber reliability, functional tests will be performed once each operating cycle.

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