

Attachment
Clarification To Proposed Revision Of Technical Specification
3/4.7.8., Snubbers

8807070549 880519
PDR ADOCK 05000367
P PDC

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

d. Visual Inspection Acceptance Criteria (Continued)

and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specification 4.7.8f. When a fluid port of a hydraulic snubber is found to be uncovered the snubber shall be declared inoperable and shall not be determined OPERABLE via functional testing unless the test is started with the piston in the as-found setting, extending the piston rod in the tension mode direction. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

e. Functional Tests

** INSERT ATTACHED PAGE

During the first refueling shutdown and at least once per refueling thereafter, a representative sample of snubbers shall be tested using one of the following sample plans.**The sample plan shall be selected prior to the test period and cannot be changed during the test period. The NRC shall be notified of the sample plan selected prior to the test period.

- 1) At least 10% of the snubbers required by Specification 3.7.8 shall be functionally tested either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria of Specification 4.7.8f., an additional 10% of the snubbers shall be functionally tested until no more failures are found or until all snubbers have been functionally tested; or
- 2) A representative sample of the snubbers required by Specification 3.7.8 shall be functionally tested in accordance with Figure 4.7-1. "C" is the total number of snubbers found not meeting the acceptance requirements of Specification 4.7.8f (failures). The cumulative number of snubbers tested is denoted by "N." Test results shall be plotted sequentially in the order of sample assignment (i.e., each snubber shall be plotted by its order in the random sample assignments, not by the order of testing). If at any time the point plotted falls in the "Accept" region, testing of snubbers may be terminated. When the point plotted lies in the "Continue Testing" region, additional snubbers shall be tested until the point falls in the "Accept" region, or all the snubbers required by Specification 3.7.8 have been tested. Testing equipment failure during functional testing may invalidate that day's testing and allow that day's testing to resume anew at a later time, providing all snubbers tested with the failed equipment during the day of equipment failure are retested; or
- 3) An initial representative sample of fifty-five (55) snubbers shall be functionally tested. For each snubber which does not meet the functional test acceptance criteria, another sample of

Addition To T.S. 3/4.7.8., Page 3/4 7-20

The large bore steam generator hydraulic snubbers shall be treated as a separate population for functional test purposes. A 10% random sample from previously untested snubbers shall be tested at least once per refueling outage until the entire population has been tested. This testing cycle shall then begin anew. For each large bore steam generator hydraulic snubber that does not meet the functional test acceptance criteria, at least 10% of the remaining population of untested snubbers for that testing cycle shall be tested.