

ENCLOSURE 1

Proposed Technical Specification Changes

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INDEX

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

<u>SECTION</u>	<u>PAGE</u>
<u>CONTAINMENT SYSTEMS (Continued)</u>	
3/4.6.4 PRIMARY CONTAINMENT AND DRYWELL ISOLATION VALVES.....	3/4 6-31
3/4.6.5 SECONDARY CONTAINMENT	
Secondary Containment Integrity - Operating.....	3/4 6-48
Secondary Containment Integrity - Fuel Building.....	3/4 6-50
Secondary Containment Automatic Isolation Dampers.....	3/4 6-51
Standby Gas Treatment System.....	3/4 6-55
Shield Building Annulus Mixing System.....	3/4 6-57
Fuel Building Ventilation.....	3/4 6-58
3/4.6.6 ATMOSPHERE CONTROL	
Primary Containment Hydrogen Recombiner Systems.....	3/4 6-61
Primary Containment/Drywell Hydrogen Mixing System.....	3/4 6-62
Primary Containment/Drywell Hydrogen Ignition System.....	3/4 6-64
<u>3/4.7 PLANT SYSTEMS</u>	
3/4.7.1 SERVICE WATER SYSTEMS	
Standby Service Water System.....	3/4 7-1
Ultimate Heat Sink.....	3/4 7-3
3/4.7.2 MAIN CONTROL ROOM AIR CONDITIONING SYSTEM.....	3/4 7-5
3/4.7.3 REACTOR CORE ISOLATION COOLING SYSTEM.....	3/4 7-8
3/4.7.4 SNUBBERS. DELETED.	3/4 7-10
3/4.7.5 SEALED SOURCE CONTAMINATION.....	3/4 7-16

SEP 09 1988

INDEX

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LIST OF FIGURES

<u>FIGURE</u>	<u>TITLE</u>	<u>PAGE</u>
3.2.1-1	Maximum Average Planar Linear Heat Generation Rate (BP8SRB094).....	3/4 2-2
3.2.1-2	Maximum Average Planar Linear Heat Generation Rate (BP8SRB163).....	3/4 2-3
3.2.1-3	Maximum Average Planar Linear Heat Generation Rate (BP8SRB248).....	3/4 2-4
3.2.1-4	Maximum Average Planar Linear Heat Generation Rate (BP8SRB278).....	3/4 2-5
3.2.1-5	Maximum Average Planar Linear Heat Generation Rate (BP8SRB299).....	3/4 2-6
3.2.1-6	Maximum Average Planar Linear Heat Generation Rate (BP8SRB305).....	3/4 2-6A
3.2.3-1	MCPR _p	3/4 2-9
3.2.3-2	MCPR _p	3/4 2-10
3.4.1.1-1	Thermal Power versus Core Flow.....	3/4 4-3
3.4.6.1-1	Minimum Temperature Required Versus Reactor Pressure.....	3/4 4-24
4.7.4-1	Sample Plan for Snubber Functional Test. DELETED	3/4 7-15
B 3/4 2.3-1	Power Flow Operating Map.....	B 3/4 2-6
B 3/4 3-1	Reactor Vessel Water Level.....	B 3/4 3-8
B 3/4.4.6-1	Fast Neutron Fluence (E>1 MeV) at 1/4 T as a Function of Service Life.....	B 3/4 4-8
5.1.1-1	Exclusion Area.....	5-2
5.1.2-1	Low Population Zone.....	5-3
5.1.3-1	Map Defining Unrestricted Areas and Site Boundary for Radioactive Gaseous and Liquid Effluents.....	5-4

PLANT SYSTEMS

3/4.7.4 ~~SNUBBERS DELETED~~

LIMITING CONDITION FOR OPERATION

3.7.4 All snubbers shall be OPERABLE. The only snubbers excluded from this requirement 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: OPERATIONAL CONDITIONS 1, 2 and 3, and OPERATIONAL CONDITIONS 4 and 5 for snubbers located on systems required OPERABLE in those OPERATIONAL CONDITIONS.

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 4.7.4.g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.4 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 groups (inaccessible and accessible) may be inspected independently according to the schedule below. The first inservice visual inspection of each type of snubber shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers. If all snubbers of each type are found OPERABLE during the first inservice visual inspection, the second inservice visual inspection shall be performed at the first refueling outage. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

DELETED

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

<u>No. of Inoperable Snubbers of Each Type per Inspection Period</u>	<u>Subsequent Visual Inspection Period*#</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%
8 or more	31 days \pm 25%

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: (1) there are no visible indications of damage or impaired OPERABILITY and (2) attachments to the foundation or supporting structure are OPERABLE, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are OPERABLE. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE 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 on that system that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.4.f.

d. Transient Event Inspection

An inspection shall be performed of all mechanical snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients, as determined from a review of operational data or a visual inspection of the systems, within 72 hours for accessible areas and within 6 months for inaccessible areas, following this determination. 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.

*The inspection interval for each type of snubber shall not be lengthened more than one step at a time.

#The provisions of Specification 4.0.2 are not applicable.

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PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

e. Functional Tests

During the first refueling shutdown and at least once per 18 months thereafter during shutdown, a representative sample of snubbers shall be tested using one of the following sample plans for each type of snubber. The sample plan 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, prior to the test period, of the sample plan selected, 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 4.7.4.f, 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
2. A representative sample of each type of snubber shall be functionally tested in accordance with Figure 4.7.4-1. "C" is the total number of snubbers of a type found not meeting the acceptance requirements of Specification 4.7.4.f. The cumulative number of snubbers of a type tested is denoted by "N". At the end of each day's testing, the new values of "N" and "C" (previous day's total plus current day's increments) shall be plotted on Figure 4.7.4-1. If at any time the point plotted falls in the "Reject" region all snubbers of that type shall be functionally tested. If at any time the point plotted falls in the "Accept" region, testing of snubbers of that type may be terminated. When the point plotted lies in the "Continue Testing" region, additional snubbers of that type shall be tested until the point falls in the "Accept" region or the "Reject" region, or all the snubbers of that type have been tested; or
3. An initial representative sample of 55 snubbers shall be functionally tested. For each snubber type which does not meet the functional test acceptance criteria, another sample of at least one-half the size of the initial sample shall be tested until the total number tested is equal to the initial sample size multiplied by the factor, $1 + C/2$, where "C" is the number of snubbers found which do not meet the functional test acceptance criteria. The results from this sample plan shall be plotted using an "Accept" line which follows the equation $N = 55(1 + C/2)$. Each snubber point should be plotted as soon as the snubber is tested. If the point plotted falls on or below the "Accept" line, testing of that type of snubber may be terminated. If the point plotted falls above the "Accept" line, testing must continue until the point falls in the "Accept" region or all the snubbers of that type been tested.

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PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4. For each type of snubber, an initial representative sample of 68 snubbers shall be functionally tested. Three snubbers of each type are allowed not meeting the functional test acceptance criteria. If the number of snubbers that failed the test is greater than 3, an additional sample of that type of snubber equal to $22(A-3)$ shall be functionally tested, where "A" is the total number of snubbers failed during the functional test of the representative sample. For each snubber that failed during the functional test of the resample, an additional sample of 22 snubbers of the same type shall be functionally tested. The tests shall continue until no more failures are found or until all snubbers of that type have been functionally 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. The representative sample selected for the functional test sample plans shall be randomly selected from the snubbers of each type and reviewed before beginning the testing. The review shall ensure as far as practical that the sample is representative of the various configurations, operating environments, range of size, and capacity of snubbers of each type. Snubbers placed in the same locations as snubbers which failed the previous functional test shall be retested at the time of the next functional test but shall not be included in the sample plan. If, during the functional testing, additional sampling is required due to failure of only one type of snubber, the functional testing results shall be reviewed at the time to determine if additional samples should be limited to the type of snubber which has failed the functional testing.

f. Functional Test Acceptance Criteria

The snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range in both tension and compression;
2. For mechanical snubbers, the force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel; and
3. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement.

Testing methods may be used to measure parameters indirectly or parameters other than those specified if those results can be correlated to the specified parameters through established methods.

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PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

g. Functional Test Failure Analysis

An engineering evaluation shall be made of each failure to meet the functional test acceptance criteria to determine the cause of the failure. The results of this evaluation shall be used, if applicable, in selecting snubbers to be tested in an effort to determine the OPERABILITY of other snubbers, irrespective of type, which may be subject to the same failure mode.

For the snubbers found inoperable, an engineering evaluation shall be performed on the components to which the inoperable snubbers are attached. The purpose of this engineering evaluation shall be to determine if the components to which the inoperable snubbers are attached were adversely affected by the inoperability of the snubbers, in order to ensure that the component remains capable of meeting the designed service.

If any snubber selected for functional 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 or design deficiency, all snubbers of the same type subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated in Specification 4.7.4.e for snubbers not meeting the functional test acceptance criteria.

h. Functional Testing of Repaired and Replaced Snubbers

Snubbers that fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers that have repairs that might affect the functional test result shall be tested to meet the functional test criteria before installation in the unit. Mechanical snubbers shall have met the acceptance criteria subsequent to their most recent service, and the freedom-of-motion test must have been performed within 12 months from the time the snubber was installed in the unit.

i. Snubber Service Life Program

The service life of all snubbers shall be monitored to ensure that the service life is not exceeded between surveillance inspections. The maximum expected service life for various critical parts shall be determined and established based on engineering information and shall be extended or shortened based on monitored test results and failure history. Critical parts shall be replaced so that the maximum service life will not be exceeded during a period when the snubber is required to be OPERABLE. The parts replacements shall be documented and the documentation shall be retained in accordance with Specification 6.10.3.

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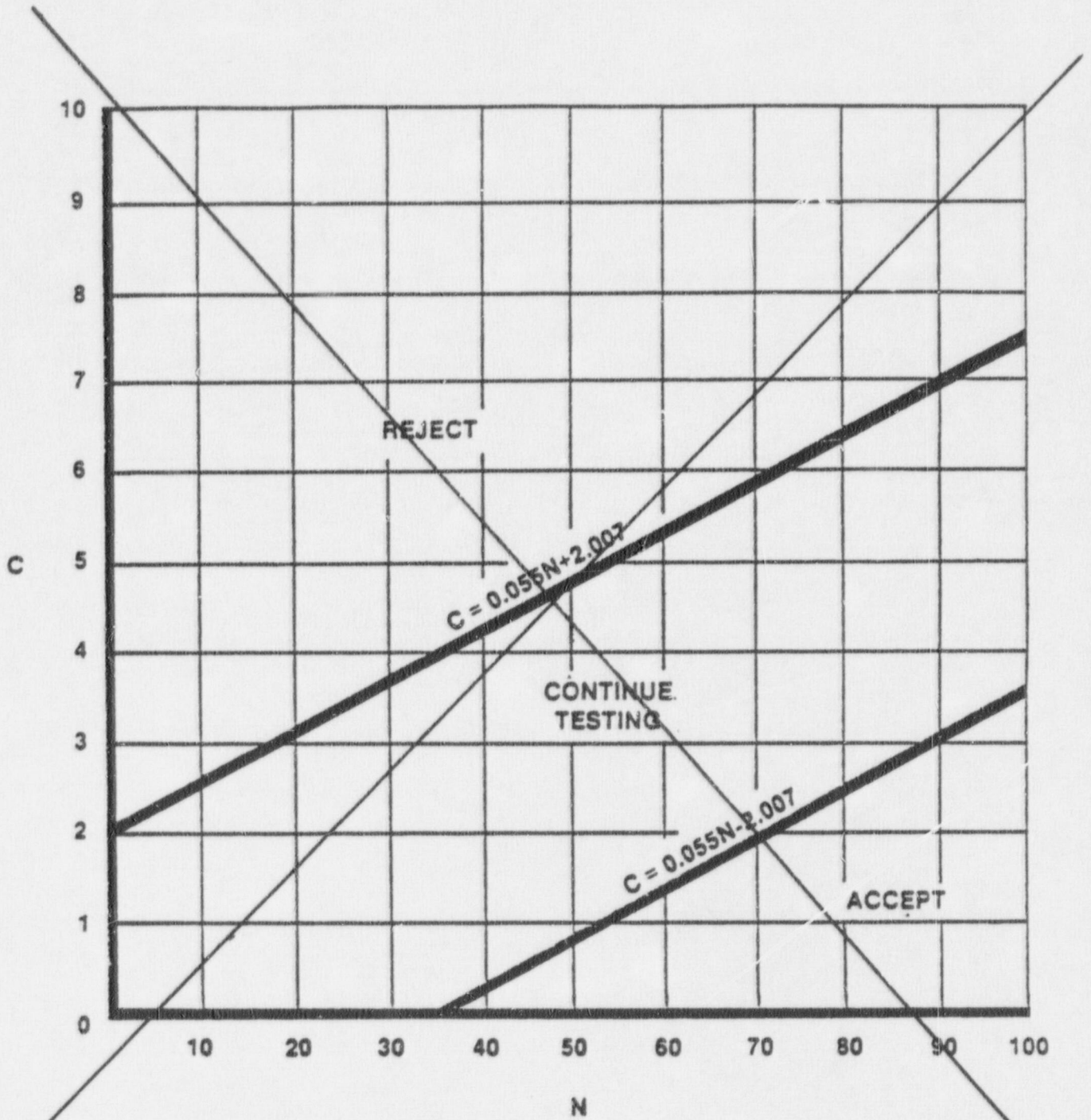


FIGURE 4.7.4.1
SAMPLE PLAN FOR SNUBBER FUNCTIONAL TEST

ENCLOSURE 2

Revised Technical Specification Bases

INDEX

BASES

SECTION

PAGE

CONTAINMENT SYSTEMS (Continued)

3/4.6.3	DEPRESSURIZATION SYSTEMS.....	B 3/4 6-5
3/4.6.4	PRIMARY CONTAINMENT AND DRYWELL ISOLATION VALVES...	B 3/4 6-6
3/4.6.5	SECONDARY CONTAINMENT.....	B 3/4 6-6
3/4.6.6	ATMOSPHERE CONTROL.....	B 3/4 6-7

3/4.7 PLANT SYSTEMS

3/4.7.1	STANDBY SERVICE WATER SYSTEM.....	B 3/4 7-1
3/4.7.2	MAIN CONTROL ROOM AIR CONDITIONING SYSTEM.....	B 3/4 7-1
3/4.7.3	REACTOR CORE ISOLATION COOLING SYSTEM.....	B 3/4 7-1
3/4.7.4	SNIBBERS DELETED	B 3/4 7-2
3/4.7.5	SEALED SOURCE CONTAMINATION.....	B 3/4 7-3
3/4.7.6	FIRE SUPPRESSION SYSTEMS.....	B 3/4 7-3
3/4.7.7	FIRE-RATED ASSEMBLIES.....	B 3/4 7-4
3/4.7.8	AREA TEMPERATURE MONITORING.....	B 3/4 7-4
3/4.7.9	MAIN TURBINE BYPASS SYSTEM.....	B 3/4 7-4
3/4.7.10	STRUCTURAL SETTLEMENT.....	B 3/4 7-4

3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1, 3/4.8.2, and 3/4.8.3	A.C. SOURCES, D.C. SOURCES and ONSITE POWER DISTRIBUTION SYSTEMS.....	B 3/4 8-1
3/4.8.4	ELECTRICAL EQUIPMENT PROTECTIVE DEVICES.....	B 3/4 8-3

PLANT SYSTEMS

BASES

REACTOR CORE ISOLATION COOLING SYSTEM (Continued)

The surveillance requirements provide adequate assurance that RCIC will be OPERABLE when required. Although all active components are testable and full flow can be demonstrated by recirculation during reactor operation, a complete functional test requires reactor shutdown. The pump discharge piping is maintained full to prevent water hammer damage and to start cooling at the earliest possible moment.

3/4.7.4 ~~SNUBBERS DELETED~~

All snubbers are required 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 that initiates dynamic loads.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, 2-kip, 10-kip, and 100-kip capacity mechanical snubbers utilizing the same design features and manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" would be of a different type, for the purposes of this Technical Specification, as would hydraulic snubbers from either manufacturer.

A list of individual snubbers with detailed information of snubber location, size and system affected shall be available at the plant. The accessibility of each snubber shall be determined and approved by the Facility Review Committee. The determination shall be based upon the accessibility of the snubber during plant operations (e.g., radiation level, temperature, atmosphere, location, etc.) The addition or deletion of any hydraulic or mechanical snubber shall be made in accordance with Section 80.59 of 10 CFR Part 50.

When a snubber is found inoperable, an engineering evaluation is performed, including the determination of the snubber mode of failure, in order 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 further assurance of snubber reliability, a representative sample of the installed snubbers will be functionally tested, during plant shutdowns, at 18 month intervals. Selection of a representative sample according to one of the four sample plans provides assurance that the snubbers in the plant will be OPERABLE within acceptance limits. Observed failures of these sample snubbers will require functional testing of additional units.

The service life of a snubber is evaluated from manufacturer input and from consideration of the snubber service conditions and associated installation and maintenance records, i.e., 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

PLANT SYSTEMS

BASES

SNUBBERS (Continued)

~~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 of the snubber service life review are not intended to affect plant operation.~~

3/4.7.5 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values. Sealed sources are classified into three groups according to their use, with surveillance requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism, i.e., sealed sources within radiation monitoring devices, are considered to be stored and need not be tested unless they are removed from the shielded mechanism.

3/4 7.6 FIRE SUPPRESSION SYSTEMS

The OPERABILITY of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety related equipment is located. The fire suppression systems consist of the water system, spray and/or sprinkler systems, Halon system and fire hose stations. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety related equipment and is a major element in the facility fire protection program.

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service. When the inoperable fire fighting equipment is intended for use as a backup means of fire suppression, a longer period of time is allowed to provide an alternate means of fire fighting than if the inoperable equipment is the primary means of fire suppression.

The surveillance requirements provide assurance that the minimum OPERABILITY requirements of the fire suppression systems are met. An allowance is made for ensuring a sufficient volume of Halon in the Halon storage tanks by verifying the weight and pressure of the tanks.

In the event the fire suppression water system becomes inoperable, immediate corrective measures must be taken since this system provides the major fire suppression capability of the plant.