

A T T A C H M E N T A

Revise the Technical Specifications as follows:

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SURVEILLANCE REQUIREMENTS (CONTINUED)

The snubbers may be categorized into two groups: those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

b. Visual Inspection Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE 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 snubbers that may be generically susceptible; ~~and~~ (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.12.d. However, when a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval.

or

→ INSERT 1
c. Functional Tests

At least once per 18 months during shutdown, a representative sample (of at least 10%) of the total of each type of snubber in use in the plant shall be functionally tested either in place or in a bench test. For Functional Testing type of snubber shall mean a group or combination of groups by load size and kind (i.e., hydraulic or mechanical) or any other combination of load size and kind. For each snubber that does not meet the functional test acceptance criteria of Specification 4.7.12.d, an additional 10% shall be functionally tested.

INSERT 1

Snubbers which have been determined to be inoperable as a result of unexpected transients, isolated damage, or other random events, and cannot be proven operable by functional testing for the same reasons, shall not be counted in determining the next visual inspection period when the provision in 4.7.12.c (that failures are subject to an engineering evaluation of component structural integrity) has been met and equipment has been restored to an operable state via repair and/or replacement as necessary.

BASES

3/4.7.9 SEALED SOURCE CONTAMINATION

The limitations on sealed source removable contamination ensure that the total body or individual organ irradiation does not exceed allowable limits in the event of ingestion or inhalation of the source material. The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. Leakage of sources excluded from the requirements of this specification represent less than one maximum permissible body burden for total body irradiation if the source material is inhaled or ingested.

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 or boron measuring devices) are considered to be stored and need not be tested unless they are removed from the shielded mechanism.

3/4.7.10 and 3/4.7.11 RESIDUAL HEAT REMOVAL SYSTEM (RHR)

Deleted

3/4.7.12 SNUBBERS

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 similar event initiating dynamic loads. Snubbers excluded from this inspection program 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.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the 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.

When the ^{or} cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, ~~and~~ verified OPERABLE by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically, susceptible snubbers are those which are of a specific make or model and have the same

ATTACHMENT B

Safety Analysis Beaver Valley Power Station, Unit No. 2 Proposed Technical Specification Change No. 26

Description of Amendment Request: The proposed amendment would revise the snubber visual inspection requirements to reflect the Unit 1 Technical Specifications.

This change is proposed as a result of a visual inspection performed during the Unit 2 refueling outage where two containment snubbers could not be axially rotated. A follow-up functional test was then performed and it was determined that these two snubbers were immovable and were then declared inoperable. A subsequent failure evaluation was performed and it was determined that the cause for this condition was the improper application of a lateral load. The results of the evaluation indicated that the lateral load had been applied to the piping near the location at which the snubbers are attached to the pipe. Although unknown, the lateral load could have been induced by someone inadvertently stepping on the line. Further investigation of the line by visual and NDE testing insured no damage to the line. Therefore, the snubber damage was determined to be an isolated case and does not apply to other snubbers generically.

In accordance with the surveillance requirements of 4.7.12.b, all containment snubbers would be required to be visually examined within 6 months \pm 25%. The proposed changes incorporated by INSERT 1 from the Unit 1 Technical Specifications would eliminate the requirement to reduce the surveillance frequency for cases such as this that result from isolated damage and can not be related generically to other snubbers. The change from "and" to "or" is also required since in the instance identified above, the damaged snubbers were immovable and thus could not be functionally tested in the as-found condition. Bases Section 3/4.7.12 Snubbers has also been revised to reflect this proposed change. This change has also been incorporated in the Callaway and Hope Creek Technical Specifications.

The proposed change will permit an inoperable snubber that cannot be determined operable by functional testing, to be declared operable for the purpose of establishing a new inspection interval if it can be determined that the snubber was rendered inoperable as a result of unexpected transients, isolated damage or other random events. Examples of events which would be considered random or isolated include an object inadvertently dropped on a snubber or damage due to work in progress. An engineering evaluation of component structural integrity would still be performed after each failure. If it can be determined that a snubber was rendered inoperable as a result of unexpected transients, isolated damage or other random events, similar failures would not be anticipated. Therefore, additional inspections would not be required to verify overall snubber operability. This change does not affect the UFSAR and will not increase the probability of an accident or decrease the margin of safety because snubber failures which are determined to be isolated in nature do not affect overall snubber operability.

ATTACHMENT C

No Significant Hazard Evaluation
Proposed Technical Specification Change No. 26

Basis for proposed no significant hazards consideration determination: The Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92c). A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The proposed changes do not involve a significant hazard consideration because:

1. Surveillance requirement 4.7.12.b has been revised by replacing "and" with "or". This allows a snubber which appears inoperable to be determined operable provided that either the cause of rejection is remedied for that snubber and other snubbers that may be generically susceptible, or the affected snubber passes the functional testing criteria. Bases Section 3/4.7.12 has also been revised to incorporate "or". This change reflects BV-1 Amendment 135 dated January 23, 1989 and has also been incorporated in the Callaway and Hope Creek Technical Specifications. An additional paragraph has also been added to permit an inoperable snubber that cannot be determined operable by functional testing to be declared operable for the purpose of establishing a new inspection interval if it can be determined that the snubber was rendered inoperable as a result of unexpected transients, isolated damage or other random events. Events that would be considered random or isolated include an object inadvertently dropped on a snubber or a chainfall accidentally anchored on a snubber. An engineering evaluation of component structural integrity would still be performed after each failure. If it can be determined that a snubber was rendered inoperable as a result of unexpected transients, isolated damage or other random events, similar failures would not be anticipated. Therefore, additional inspections should not be required to verify overall snubber operability since the identified inoperability was caused by an external source and was not generically applicable. This change was also incorporated in North Anna Technical Specification Amendment 72 dated November 21, 1985.

ATTACHMENT C

No Significant Hazard Evaluation

Proposed Technical Specification Change No. 26

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These changes will provide greater operational flexibility, eliminate unnecessary testing, reduce plant outage time and reduce radiation exposure in accordance with the plant ALARA program. The proposed changes will maintain the overall operability of snubbers while improving the visual inspection requirements. These changes will not compromise the snubber surveillance requirements or affect the FSAR accident analysis and therefore, will not increase the probability of occurrence or the consequences of accidents previously evaluated.

2. No change in plant operations or to equipment or components is required. These changes will not reduce the overall operability of snubbers on any plant system and will not create the possibility of a new or different kind of accident from those described in the FSAR.
3. The proposed changes will not reduce the operability of the plant snubbers or change the functional test requirements. The snubbers will continue being inspected and tested to ensure the structural integrity of the reactor coolant system and all other safety related systems are protected during and following a seismic or other similar event initiating dynamic loads. The plant snubbers will continue performing the required design functions, therefore, these changes do not involve a significant reduction in the margin of safety of the plant.

Therefore, based on the above considerations, implementation of the proposed changes will not involve a significant hazard.