



Constellation Nuclear

**Nine Mile Point
Nuclear Station**

*A Member of the
Constellation Energy Group*

March 15, 2002
NMP1L 1650

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Subject: Application for Amendment to Technical Specification 4.6.4, "Shock Suppressors (Snubbers)" [TAC No. MB4427]

Gentlemen:

Nine Mile Point Nuclear Station, LLC (NMPNS) hereby transmits an Application for Amendment to the Nine Mile Point Unit 1 (NMP1) Technical Specifications (TSs) as set forth in Appendix A of Operating License DPR-63. Attachment A provides retyped TS pages with marginal bars to show areas of proposed changes. Attachment B contains supporting information and analyses demonstrating that the proposed changes involve no significant hazards considerations pursuant to 10 CFR 50.92. Attachment C provides a "marked-up" copy of the current TS and Bases pages. The Bases pages are for information only and do not require issuance by the NRC. NMPNS's determination that the proposed changes meet the criteria for categorical exclusion from performing an environmental assessment is based on the evaluation included as Attachment D.

The proposed changes revise TS 4.6.4, "Shock Suppressors (Snubbers)," consistent with the snubber visual inspection and acceptance requirements of the model TSs included in Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection and Corrective Actions." Use of the alternate inspection schedule included in the proposed changes will reduce occupational radiation exposure received from performance of snubber visual examinations while maintaining the same confidence level as that provided by the current TS inspection schedule.

NMPNS plans to implement the proposed changes to TS 4.6.4 prior to the Spring 2003 refueling outage (RFO17). NMPNS, therefore, requests that this amendment application be approved and the amendment issued no later than January 15, 2003.

A 001

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Pursuant to 10 CFR 50.91(b)(1), NMPNS has provided a copy of this amendment application and the associated analyses regarding no significant hazards considerations to the appropriate state representative.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 15, 2002.

Very truly yours,


John T. Conway
Site Vice President

JTC/IAA/jm
Attachments

cc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. P. S. Tam, Senior Project Manager, NRR (2 copies)
Mr. John P. Spath
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ATTACHMENT A

NINE MILE POINT NUCLEAR STATION, LLC

LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to the Current Technical Specifications (TSs)

Replace existing Technical Specifications pages listed below with the attached revised pages. These retyped pages have marginal markings (revision bars) to indicate changes to the text.

Remove

259

260

261

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Insert

259

260

261

263a

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
<p data-bbox="149 297 709 329">3.6.4 <u>SHOCK SUPPRESSORS (SNUBBERS)</u></p> <p data-bbox="247 375 386 407"><u>Applicability</u></p> <p data-bbox="247 448 869 516">Applies to the operational status of shock suppressors (snubbers).</p> <p data-bbox="247 561 359 594"><u>Objective</u></p> <p data-bbox="247 634 743 667">To assure the capability of the snubbers to:</p> <ul data-bbox="344 708 951 919" style="list-style-type: none"> <li data-bbox="344 708 951 813">Prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, and <li data-bbox="344 854 888 919">Allow normal thermal motion during startup and shutdown. 	<p data-bbox="1031 297 1583 329">4.6.4 <u>SHOCK SUPPRESSORS (SNUBBERS)</u></p> <p data-bbox="1123 375 1262 407"><u>Applicability</u></p> <p data-bbox="1123 448 1860 516">Applies to periodic inspection and testing requirements for shock suppressors (snubbers).</p> <p data-bbox="1123 561 1234 594"><u>Objective</u></p> <p data-bbox="1123 634 1772 703">To assure the operability of the snubbers to perform their intended functions.</p>

LIMITING CONDITION FOR OPERATION

Specification

- a. During all reactor operating conditions, except cold shutdown, snubbers shall be operable on those systems required to be operable during that particular operating condition except as noted in 3.6.4.b, c and d below.
- 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.
- b. With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to the operable status or perform an engineering evaluation to determine that the components supported by the snubber(s) were not adversely affected by the inoperability of the snubber(s), i.e. the snubber(s) is (are) not required for system operability.
- c. If after 72 hours the actions as described in Section 3.6.4b have not been completed, the supported system shall be declared inoperable and the appropriate action statement for that system will be followed.

SURVEILLANCE REQUIREMENT

Specification

Each snubber shall be demonstrated operable by the performance of the following augmented inservice inspection and testing programs. Snubbers excluded from these programs 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.

a. Visual Inspection

(i) Visual Inspection Frequency

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 4.6.4-1. The visual inspection interval for each type of snubber (snubbers of the same design and manufacturer, irrespective of capacity) shall be determined based upon the criteria provided in Table 4.6.4-1.

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
<p>d. If the actions described in 3.6.4.b or c resulted in replacement or restoration to the operable status of the affected snubber(s), perform an engineering evaluation to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubber.</p>	<p>(ii) <u>Visual Inspection Acceptance Criteria</u></p> <p>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 that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined operable per Specification 4.6.4.b. 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 of TS 3.6.4 shall be met.</p>

TABLE 4.6.4-1

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

- 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 shall be made and documented before any inspection and shall serve as the basis upon which the next inspection interval for that category is determined.
- Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use the 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 4.0.1 are applicable for all inspection intervals up to and including 48 months.

ATTACHMENT B
NINE MILE POINT NUCLEAR STATION, LLC
LICENSE NO. DPR-63
DOCKET NO. 50-220

Supporting Information and No Significant Hazards Consideration Analysis

Background

Snubbers (shock suppressors) are utilized at Nine Mile Point Unit 1 (NMP1) to ensure the structural integrity of the reactor coolant system and other safety-related systems, as well as certain non-safety related systems, during and following a seismic event or other event initiating dynamic loads.

The current NMP1 Technical Specifications (TSs) for snubbers were issued on September 23, 1985 (Amendment No. 74). This amendment revised NMP1 TS 3.6.4/4.6.4 to be consistent with the intent of the model snubber TSs included in Generic Letter (GL) 84-13, "Technical Specification for Snubbers," dated May 3, 1984. Subsequently, the NRC issued GL 90-09, "Alternative Requirements for Snubber Visual Inspection and Corrective Actions," dated December 11, 1990, which provided alternative requirements for snubber visual inspection intervals. Nine Mile Point Nuclear Station, LLC (NMPNS) is requesting a revision of the NMP1 TSs to reflect the model TSs included in GL 90-09.

Description of Change

The proposed change revises TS Section 4.6.4 to incorporate the snubber visual inspection surveillance schedule and acceptance criteria contained in the model TSs included in GL 90-09. Certain variations from the model TSs were considered necessary or desirable while incorporating the requirements of the model TSs into the NMP1 custom TSs. These variations are described and evaluated below.

Variations from GL 90-09 Model TSs:

1. Currently, the Applicability section of NMP1 TS 4.6.4 refers to "periodic testing requirement" for snubbers while the Specification section of TS 4.6.4 refers to the "inspection program" for snubbers. The two sections have been revised to clarify that there are both periodic inspection and periodic testing requirements for snubbers included in TS 4.6.4. This clarification also serves to make it clear that the term "inspection program" as used in TS 3.6.4 (which is not being revised) encompasses both inspection and testing requirements. This variation is an administrative change.

2. The model TS 4.7.9 reference to generic Specification 4.0.5 has not been incorporated into the Specification section of NMP1 TS 4.6.4. Generic Specification 4.0.5 applies to Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components. The inservice inspection portion of NMP1 TS 4.2.6 (equivalent to that in generic Specification 4.0.5) has already been proposed for removal (relocation) from the TSs by NMPNS's license amendment application dated November 26, 2001 (NMP1L 1628, TAC No. MB3208). Additionally, the reference to inservice testing of ASME Code Class 1, 2, and 3 components is unnecessary as ASME Code required inservice testing is implemented per 10CFR50.55a. Therefore, the reference to generic Specification 4.0.5 need not be incorporated.
3. The definition of "type of snubber" found in Section 4.7.9.a of the model TSs has been incorporated into Section 4.6.4.a(i), "Visual Inspection Frequency," of the NMP1 TSs and is not presented as a separate item. This variation is administrative.
4. The statement in model TS 4.7.9.b concerning determination of the first inspection interval using the new visual inspection acceptance criteria of model TS Table 4.7-2 has not been incorporated into TS 4.6.4.a(i). The new visual inspection criteria were already included in the procedure utilized for the last visual inspection of the snubbers. Therefore, the proposed frequency criteria can be adopted upon receiving approval of the proposed amendment and there is no need to include the statement from model TS 4.7.9.b. This variation is administrative.
5. The model TS table containing snubber visual inspection intervals (Table 4.7-2) includes snubber populations up to "1000 or greater." The equivalent NMP1 TS table (Table 4.6.4-1) extends only to snubber populations up to 200. This population encompasses all the snubbers that are subject to visual inspection per TS 4.6.4, regardless of type or category. This variation is considered administrative.
6. Note 1 of NMP1 TS Table 4.6.4-1 is an editorially revised version of Note 1 of the equivalent model TS Table 4.7-2. This variation is editorial.
7. Note 6 of model TS Table 4.7-2 references generic Specification 4.0.2, which addresses the maximum allowable extension in the specified time intervals associated with TS Surveillance Requirements. Note 6 of the equivalent NMP1 TS Table 4.6.4-1 references Specification 4.0.1, which is the equivalent of generic Specification 4.0.2. This variation is editorial.

Reason for Change

Currently, NMP1 TS 4.6.4.a(i) requires visual inspection of safety-related and certain non-safety related snubbers at least during every refueling outage. More frequent inspection is required if

one or more snubbers are found inoperable. These inspections, particularly those performed in high radiation areas, entail significant resources and unnecessary radiological exposure to personnel. Adoption of the alternative inspection schedule presented in proposed TS Table 4.6.4-1 generally will allow performance of snubber visual inspections and corrective actions during refueling outages. Good performance of snubbers during visual inspections will allow reduction of the inspection frequency from every refueling outage to every other refueling outage. This reduction will save outage manpower and reduce occupational exposure associated with snubber visual inspections.

Evaluation

(The variations from GL 90-09 model TSs are evaluated under Description of Change.)

The current NMP1 TSs 3.6.4/4.6.4 impose surveillance requirements for visual inspection and functional testing of safety-related as well as certain non-safety related snubbers. A visual inspection is the observation of the condition of installed snubbers to identify those that are damaged, degraded, or inoperable as caused by physical means, leakage, corrosion, or environmental exposure. To verify that a snubber can operate within specific performance limits, functional testing is performed that typically involves removing the snubber and testing it on a specially-designed test stand. Functional testing provides a 95 percent confidence level that 90 percent to 100 percent of the snubbers operate within specified acceptance limits. The performance of visual examinations is a separate process that complements the functional testing program and provides additional confidence in snubber operability.

TS 4.6.4a(i) specifies a schedule for snubber visual inspections that is based on the number of inoperable snubbers found during the previous visual inspection, regardless of the size of the snubber population inspected. Because of this, inspection intervals could be significantly shortened due to findings in a small portion of the snubbers inspected. To alleviate this generic industry concern with snubber visual inspections, the NRC issued GL 90-09, which provided an alternate schedule for visual inspections that maintains the same confidence level as the existing schedule and will allow performance of snubber visual inspections and corrective actions during refueling outages. The alternate inspection schedule is based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of snubber populations or categories. Based on GL 90-09 guidance and the successful results of recent snubber inspections at NMP1, the adoption of the alternate snubber inspection schedule is justified and has significant benefit for NMP1 while maintaining the same level of confidence in plant safety as provided by the existing TSs.

No Significant Hazards Consideration Analysis

10 CFR 50.91 requires a licensee requesting an amendment to provide its analysis concerning the issue of no significant hazards consideration using the standards in 10 CFR 50.92. Nine Mile Point Nuclear Station, LLC (NMPNS) has evaluated this proposed amendment pursuant to

10 CFR 50.91 and has determined that it involves no significant hazards considerations. The following analysis has been performed:

1. The operation of Nine Mile Point Unit 1 in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Snubbers are utilized at Nine Mile Point Unit 1 (NMP1) to ensure the structural integrity of the reactor coolant system and other safety-related (as well as certain non-safety related) systems during and following a seismic event or other event initiating dynamic loads. The proposed change to the snubber visual inspection schedule is based on that delineated in NRC Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection and Corrective Actions." This change does not modify any accident initiators or change any equipment or procedures used to limit the consequences of any accidents previously evaluated.

Accordingly, the proposed amendment will not significantly increase the probability or consequences of an accident previously evaluated.

2. The operation of Nine Mile Point Unit 1 in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

No physical modifications are being made to any snubbers or to any systems supported by snubbers by this proposed amendment. No method of plant or system operation is varied by use of the alternate snubber visual inspection schedule delineated in GL 90-09. Only the method utilized to determine future surveillance intervals for snubber visual inspections based on the previous inspection results is changed by the proposed amendment. This method was developed and published by the NRC in GL 90-09 for generic application at nuclear power plants.

Accordingly, the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The operation of Nine Mile Point Unit 1, in accordance with the proposed amendment, will not involve a significant reduction in a margin of safety.

In GL 90-09, the NRC staff determined that use of the alternate snubber visual inspection schedule by nuclear power plants will maintain the same level of confidence as the previous schedule required by the plants' Technical Specifications. GL 90-09 also recognized that snubber visual inspection is a complementary process to snubber functional testing and provides additional confidence in snubber operability. Snubber functional testing is not being modified by this proposed amendment.

Therefore, the proposed change will not adversely affect any structure, system, component, or function that is safety-related or important to safety. Accordingly, the proposed amendment will not involve a significant reduction in a margin of safety.

ATTACHMENT C

NINE MILE POINT NUCLEAR STATION, LLC

LICENSE NO. DPR-63

DOCKET NO. 50-220

“Marked-Up” Copy of the Current Technical Specifications (TS) and Bases

The current versions of TS pages 259, 260, 261 and Bases page 264 have been marked-up by hand to reflect the proposed change. TS page 263a, which is also included, is entirely new and identical to TS page 263a in Attachment A. The current versions of TS pages 262 and 263 have no changes but are included for continuity.

LIMITING CONDITION FOR OPERATION

3.6.4 SHOCK SUPPRESSORS (SNUBBERS)

Applicability

Applies to the operational status of shock suppressors (snubbers).

Objective

To assure the capability of the snubbers to:

Prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, and

Allow normal thermal motion during startup and shutdown.

SURVEILLANCE REQUIREMENT

4.6.4 SHOCK SUPPRESSORS (SNUBBERS)

Applicability

Applies to ~~the~~ periodic testing requirement^s for shock suppressors (snubbers). *inspection and*

Objective

To assure the operability of the snubbers to perform their intended functions.

LIMITING CONDITION FOR OPERATION

Specification

- a. During all reactor operating conditions, except cold shutdown, snubbers shall be operable on those systems required to be operable during that particular operating condition except as noted in 3.6.4.b, c and d below.

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.

- b. With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to the operable status or perform an engineering evaluation to determine that the components supported by the snubber(s) were not adversely affected by the inoperability of the snubber(s), i.e. the snubber(s) is (are) not required for system operability.
- c. If after 72 hours the actions as described in Section 3.6.4b have not been completed, the supported system shall be declared inoperable and the appropriate action statement for that system will be followed.

SURVEILLANCE REQUIREMENT

Specification

INSERT → ~~The following surveillance requirements apply to snubbers.~~ Snubbers excluded from this inspection *these* 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.

a. Visual Inspection

(i) Visual Inspection Frequency

INSERT → Snubbers shall be visually inspected in accordance with the following schedule:

Number of Snubbers Found Inoperable During Inspection or During Inspection Interval	Next Required Inspection Interval
0	Refueling period
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%

The required inspection interval shall not be lengthened more than one step at a time.

LIMITING CONDITION FOR OPERATION

- d. If the actions described in 3.6.4.b or c resulted in replacement or restoration to the operable status of the affected snubber(s), perform an engineering evaluation to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubber.

SURVEILLANCE REQUIREMENT

INSERT → B (cont'd) ~~Snubbers may be categorized into two types (mechanical and hydraulic). These may then be classified as "accessible" or "inaccessible" based on accessibility for inspection during operation. These four groups may be inspected independently according to the above schedule.~~

(ii) Visual Inspection Acceptance Criteria

INSERT → C ~~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; or (2) the affected snubber is functionally tested in the as found condition and determined operable per Specification 4.6.4.b as applicable.~~

INSERT A

Each snubber shall be demonstrated operable by the performance of the following augmented inservice inspection and testing programs.

INSERT B

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 4.6.4-1. The visual inspection interval for each type of snubber (snubbers of the same design and manufacturer, irrespective of capacity) shall be determined based upon the criteria provided in Table 4.6.4-1.

INSERT C

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 that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined operable per Specification 4.6.4.b. 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 of TS 3.6.4 shall be met.

LIMITING CONDITION FOR OPERATION**SURVEILLANCE REQUIREMENT****b. Functional Testing****(i) Functional Test Frequency**

At least once each refueling cycle, 10% of the total of each type (mechanical or hydraulic, accessible or inaccessible) of snubber in use in the plant 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 4.6.4b(ii) an additional 10% of that type of snubber shall be functionally tested.

(ii) Functional Test Acceptance Requirement

Hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity.
2. Freedom of movement exists in both tension and compression.

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.

[NEXT PAGE IS 263a AND HAS
TABLE 4.6.4-1]

LIMITING CONDITION FOR OPERATION

SURVEILLANCE REQUIREMENT

2. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

[THIS TABLE AND THIS PAGE ARE NEW ADDITIONS.]

TABLE 4.6.4-1

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

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 shall be made and documented before any inspection and shall serve as the basis upon which the next inspection interval for that category is determined.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use the 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 4.0.1 are applicable for all inspection intervals up to and including 48 months.

BASES FOR 3.6.4 AND 4.6.4 SHOCK SUPPRESSORS (SNUBBERS)

Snubbers are required to be operable to ensure that the structural integrity of the reactor coolant system and other safety related systems is maintained during and following a seismic or other event initiating dynamic loads.

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 number of 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. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

~~Hydraulic or mechanical, accessible or inaccessible, snubbers may each be treated as a different entity for the above surveillance programs.~~

is based on the number of unacceptable snubbers found during the previous inspection in proportion to the population of the various snubber types and categories. The inspection schedule is based on the guidance provided in Generic Letter 90-09.

ATTACHMENT D

NINE MILE POINT NUCLEAR STATION, LLC

LICENSE NO. DPR-63

DOCKET NO. 50-220

Environmental Considerations

The proposed amendment involves a change in the installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or a change to an inspection or surveillance requirement. Nine Mile Point Nuclear Station, LLC, has reviewed the proposed amendment and determined that it does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.