

NPF-10-313

ATTACHMENT "B"  
Revised Existing Specifications  
Unit 2

9001110022 900103  
PDR ADOCK 05000361  
P PDC

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

<u>No. Inoperable Snubbers per Inspection Period</u>	<u>Subsequent Visual Inspection Period*# # #</u>
0	18 months $\pm$ 25% <del>###</del>
1	12 months $\pm$ 25% <del>###</del>
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 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.

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, and (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to (a) the component or pipe and (b) the snubber anchorage are secure. 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 that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specification 4.7.6.e or 4.7.6.f, as applicable. 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. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

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

# The provisions of Specification 4.0.2 are not applicable.

## 20 months  $\pm$  25% for inspections conducted during the Cycle 5 refueling outage.

~~### 14 months  $\pm$  25% for inspections conducted during the Cycle 4 refueling outage.~~

## PLANT SYSTEMS

### BASES

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#### 3/4.7.6 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 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.

For visual inspection snubbers are categorized into two (2) groups, those accessible and those inaccessible during reactor operation. For functional testing, snubbers are categorized into types by design and manufacturer, irrespective of capacity. For example, Pacific Scientific snubbers are divided into four types corresponding to different design features: PSA 1/4 and 1/2 are one type; PSA 1, 3, and 10 are another; PSA 6 is another; and PSA 35 and 100 are a fourth type.

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. 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. Amendment No. ~~76~~ allows a one time extension of the inspection period during Cycle ~~45~~ operation while the NRC develops generic guidance applicable to 24 month operating cycles.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at refueling intervals.

Hydraulic snubbers and mechanical snubbers may each be treated as a different entity for the above surveillance programs.