

ATTACHMENT A

EXISTING TECHNICAL SPECIFICATION 3/4.7.6

SAN ONOFRE NUCLEAR GENERATING STATION

UNIT 2

8501250112 850123  
PDR ADOCK 05000361  
P PDR

## PLANT SYSTEMS

### 3/4.7.6 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

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3.7.6 All snubbers listed in Tables 3.7-4a and 3.7-4b shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

#### ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.6.g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

#### SURVEILLANCE REQUIREMENTS

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4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

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

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 listed in Tables 3.7-4a and 3.7-4b. If less than two snubbers of any type are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months  $\pm$  25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

<u>No. 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. Refueling Outage Inspections

During each refueling outage an inspection shall be performed of all snubbers listed in Tables 3.7-4a and 3.7-4b attached to sections of safety systems piping that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems. In addition to satisfying the visual inspection acceptance criteria, freedom of motion of mechanical snubbers shall be verified using one of the following: (i) manually induced snubber movement; (ii) evaluation of in-place snubber piston setting; (iii) stroking the mechanical snubber through its full range of travel.

#### d. 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. 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, 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.f. When a fluid port of a hydraulic snubber is found to be uncovered the snubber shall be declared inoperable and cannot 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.

\*The inspection interval for each type of snubber shall not be lengthened more than one step at a time unless a generic problem has been identified and corrected; in that event the inspection interval may be lengthened one step the first time and two steps thereafter if no inoperable snubbers of that type are found.

#The provisions of Specification 4.0.2 are not applicable.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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#### e. Functional Tests

During the first refueling shutdown and at least once per 18 months thereafter during shutdown, a representative sample of either:

(1) 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 each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.6.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 4.7.1, "C" is the total number of snubbers of a type found not meeting the acceptance requirements of Specification 4.7.6.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 4.7.1. If at any time the point plotted falls in the "Reject" region all snubbers of that type shall be functionally tested. If any any time the point plotted falls in the "Accept" region testing of that type of snubber shall 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.

The representative sample selected for functional testing shall include the various configurations, operating environments, and the range of size and capacity of snubbers of each type. The representative sample should be weighted to include more snubbers from severe service areas such as near heavy equipment. Snubbers placed in the same location as snubbers which failed the previous functional test shall be included in the next test lot if the failure analysis shows that failure was due to location.

#### 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, except that inertia dependent, acceleration limiting mechanical snubbers, may be tested to verify only that activation takes place in both directions of travel.
2. Snubber bleed, or release rate where required, is present in both tensions and compression, within the specified range.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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3. Where required, the force required to initiate or maintain motion of the snubber is within the specified range in both direction of travel.
4. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement.
5. Fasteners for attachment of the snubber to the component and to the snubber anchorage are secure.

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.

#### 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 snubber are attached. The purpose of this engineering evaluation shall be to determine if the components to which the inoperable snubbers were 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 lockup 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 4.7.6.e. for snubbers not meeting the functional test acceptance criteria.

#### h. Functional Testing of Repaired and Replaced Snubbers

Snubbers which fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers which have repairs which might affect the functional test result shall be tested to meet the functional test criteria before installation in the unit. These snubbers shall have met the acceptance criteria subsequent to their most recent service, and the functional test must have been performed within 12 month before being installed in the unit.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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i. Snubber Seal Replacement Program

The seal service life of hydraulic snubbers shall be monitored to ensure that the seals do not fail between surveillance inspections. The maximum expected service life for the various seals, seal materials, and applications shall be estimated based on engineering information and the seals shall be replaced so that the maximum expected service life does not expire during a period when the snubber is required to be OPERABLE. The seal replacements shall be documented and the documentation shall be retained in accordance with Specification 6.10.2.

j. Exemption From Visual Inspection or Functional Tests

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubber for the applicable design conditions at either the completion of their fabrication or at a subsequent date. Snubbers so exempted shall continue to be listed in Tables 3.7-4a and 3.7-4b with footnotes indicating the extent of the exemptions.

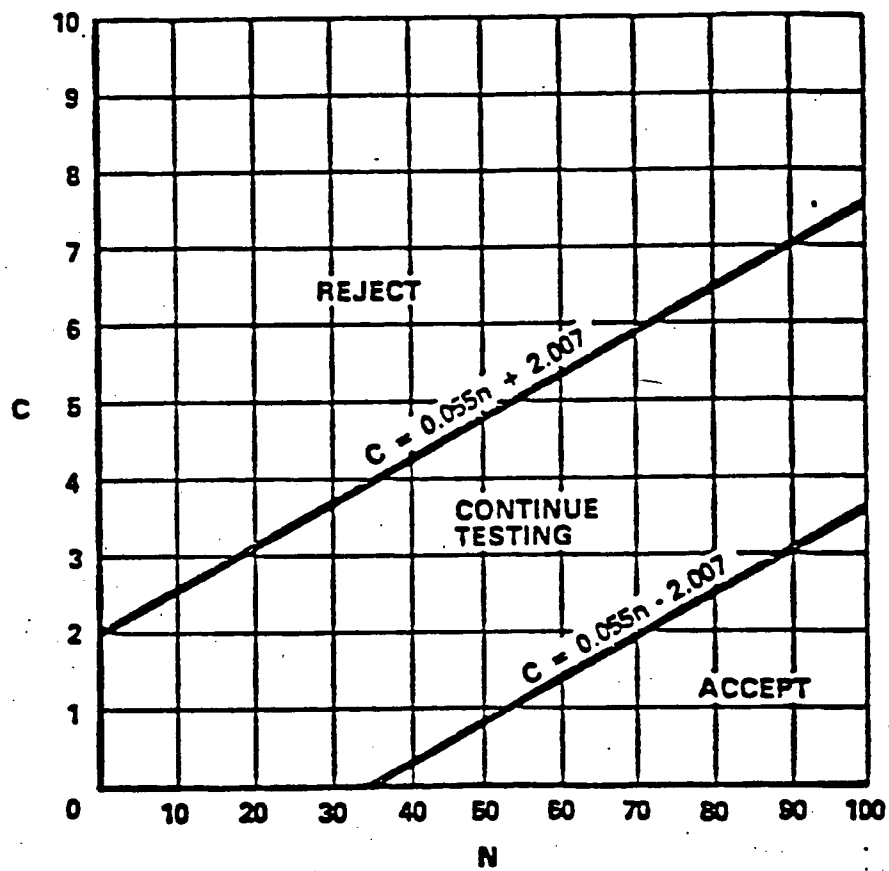


FIGURE 4.7-1 SAMPLING PLAN FOR SNUBBER FUNCTIONAL TEST

TABLE 3.7-4a

SAFETY RELATED HYDRAULIC SNUBBERS\*

PAUL MONROE

SYSTEM	Size (Kips)	
	543	826
RC	4	4
TOTAL	8	

\*Snubbers may be added to safety-related systems without prior License Amendment to Table 3.7-4a provided that a revision to Table 3.7-4a is included with the next License Amendment request.



Table 3.7-4b

Safety-Related Mechanical Snubbers\*

## PACIFIC SCIENTIFIC

System	Size (Kips)							
	Small		Medium				Large	
	1/4	1/2	1	3	6	10	35	100
RC	39	12	15	34		16	9	3
ST	29	3	20	12		9	5	22
BM	18	11						
CC	19	24	16	4		4	2	
SS	34	1	2					
SI	86	48	51	46		20	13	1
FW	1	4	2	4		13	2	
FS	3	18	10	5				
VC	39	18	9					
CS	5	14	25	16				
SC				4		3	2	
CH		1						
CB			4					
GR	4							
CEDM				4	212			
Subtotal-1	277	154	154	129	212	65	33	26
Subtotal-2	431		560				59	
Total	1050							

\*Snubbers may be added to safety-related systems without prior License Amendment to Table 3.7-4b provided that a revision to Table 3.7-4b is included with the next License Amendment request.

## 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.

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

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.

To provide assurance of snubber functional reliability, one of two sampling and acceptance criteria methods are used:

- 1) Functionally test 10% of a type of snubber with an additional 10% tested for each functional testing failure or,
- 2) Functionally test a sample size and determine sample acceptance or rejection using Figure 4.7-1.

Figure 4.7-1 was developed using "Wald's Sequential Probability Ratio Plan" as described in "Quality Control and Industrial Statistics" by Acheson J. Duncan.

## PLANT SYSTEMS

### BASES

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#### SNUBBERS (Continued)

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (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 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 the snubber service life review are not intended to affect plant operation.

#### 3/4.7.7 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 or boron measuring devices) are considered to be stored and need not be tested unless they are removed from the shield mechanism.

#### 3/4.7.8 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 system consists of the water system, spray and/or sprinklers, 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.

## ADMINISTRATIVE CONTROLS

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. All REPORTABLE OCCURRENCES submitted to the Commission.
- d. Records of surveillance activities; inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to the procedures required by Specification 6.8.1.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

6.10.2 The following records shall be retained for the duration of the Unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Table 5.7-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.

## ADMINISTRATIVE CONTROLS

- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the OSRC and the NSG.
- l. Records of the service lives of all snubbers listed in Tables 3.7-4a and 3.7-4b including the date at which the service life commences and associated installation and maintenance records.
- m. Records of secondary water sampling and water quality.

### 6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

### 6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Exposure Permit (REP)\*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.

\*Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the REP issuance requirement during the performance of their assigned radiation protection duties, provided they are otherwise following approved plant radiation protection procedures for entry into high radiation areas.

ATTACHMENT B

EXISTING TECHNICAL SPECIFICATION 3/4.7.6

SAN ONOFRE NUCLEAR GENERATING STATION

UNIT 3

## PLANT SYSTEMS

### 3/4.7.6 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

3.7.6 All snubbers listed in Tables 3.7-4a and 3.7-4b shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

#### ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.6.g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

#### SURVEILLANCE REQUIREMENTS

4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

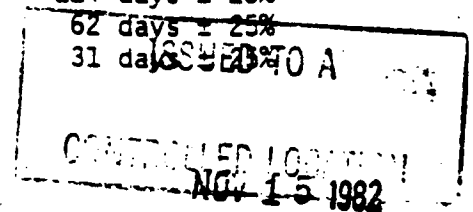
a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

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 listed in Tables 3.7-4a and 3.7-4b. If less than two snubbers of any type are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months  $\pm$  25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

<u>No. 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%



## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

#### c. Refueling Outage Inspections

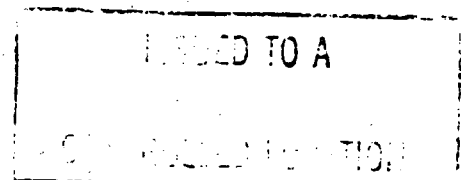
During each refueling outage an inspection shall be performed of all snubbers listed in Tables 3.7-4a and 3.7-4b attached to sections of safety systems piping that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems. In addition to satisfying the visual inspection acceptance criteria, freedom of motion of mechanical snubbers shall be verified using one of the following: (i) manually induced snubber movement; (ii) evaluation of in-place snubber piston setting; (iii) stroking the mechanical snubber through its full range of travel.

#### d. 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. 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, 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.f. When a fluid port of a hydraulic snubber is found to be uncovered the snubber shall be declared inoperable and cannot 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.

\* The inspection interval for each type of snubber shall not be lengthened more than one step at a time unless a generic problem has been identified and corrected; in that event the inspection interval may be lengthened one step the first time and two steps thereafter if no inoperable snubbers of that type are found.

# 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 either:

(1) 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 each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.6.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 4.7-1. "C" is the total number of snubbers of a type found not meeting the acceptance requirements of Specification 4.7.6.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 4.7-1. 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 that type of snubber shall 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.

The representative sample selected for functional testing shall include the various configurations, operating environments, and the range of size and capacity of snubbers of each type. The representative sample should be weighted to include more snubbers from severe service areas such as near heavy equipment. Snubbers placed in the same location as snubbers which failed the previous functional test shall be included in the next test lot if the failure analysis shows that failure was due to location.

#### 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, except that inertia dependent, acceleration limiting mechanical snubbers; may be tested to verify only that activation takes place in both directions of travel.
2. Snubber bleed, or release rate where required, is present in both tensions and compression, within the specified range.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

3. Where required, the force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel.
4. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement.
5. Fasteners for attachment of the snubber to the component and to the snubber anchorage are secure.

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.

#### 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 were 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 4.7.6.e. for snubbers not meeting the functional test acceptance criteria.

#### h. Functional Testing of Repaired and Replaced Snubbers

Snubbers which fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers which have repairs which might affect the functional test result shall be tested to meet the functional test criteria before installation in the unit. These snubbers shall have met the acceptance criteria subsequent to their most recent service, and the functional test must have been performed within 12 months before being installed in the unit.

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## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

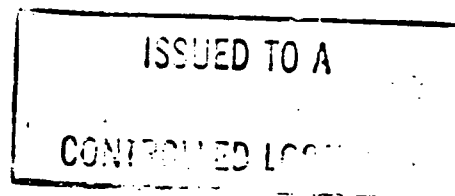
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i. Snubber Seal Replacement Program

The seal service life of hydraulic snubbers shall be monitored to ensure that the seals do not fail between surveillance inspections. The maximum expected service life for the various seals, seal materials, and applications shall be estimated based on engineering information and the seals shall be replaced so that the maximum expected service life does not expire during a period when the snubber is required to be OPERABLE. The seal replacements shall be documented and the documentation shall be retained in accordance with Specification 6.10.2.

j. Exemption From Visual Inspection or Functional Tests

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubber for the applicable design conditions at either the completion of their fabrication or at a subsequent date. Snubbers so exempted shall continue to be listed in Tables 3.7-4a and 3.7-4b with footnotes indicating the extent of the exemptions.



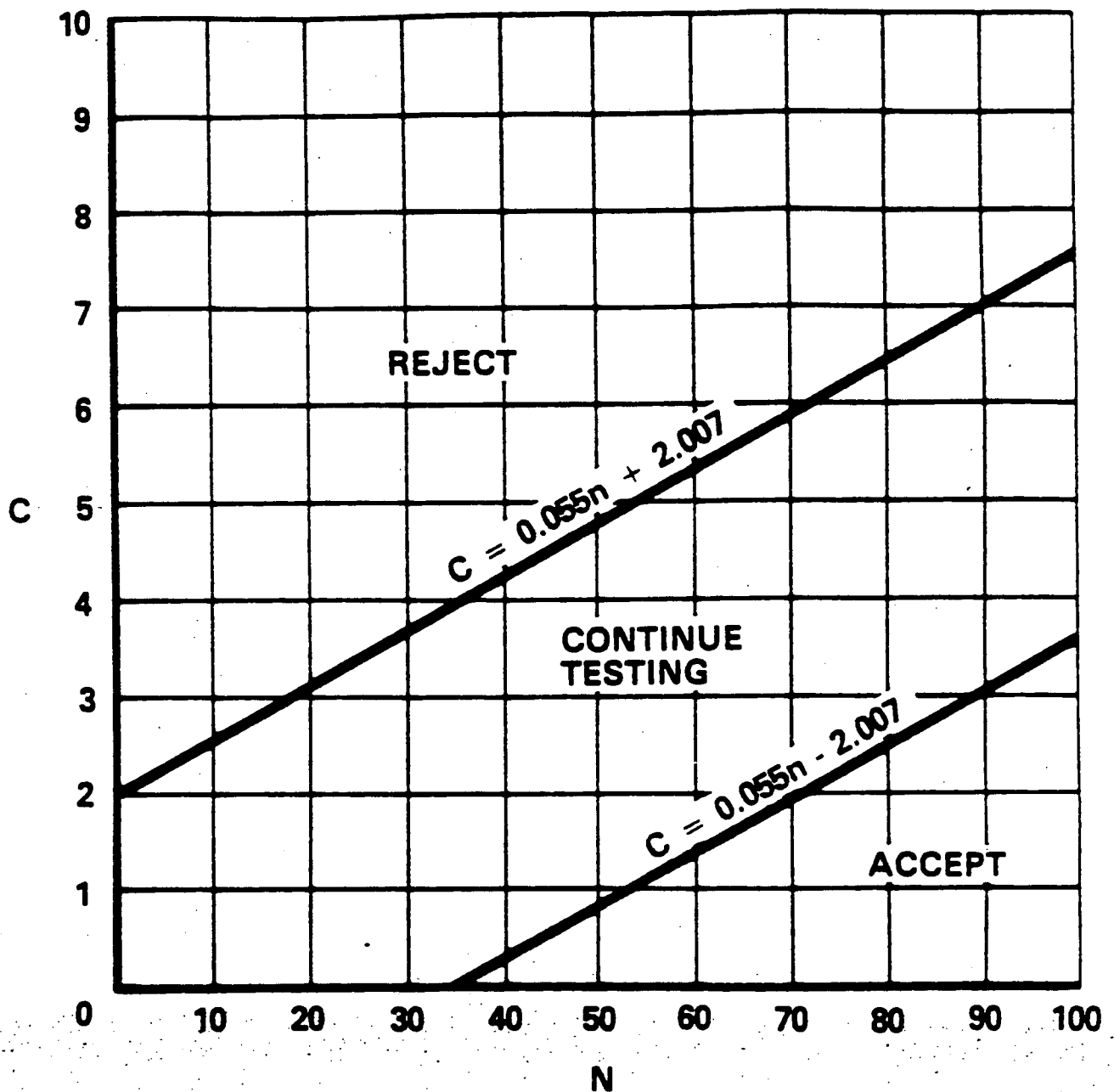


FIGURE 4.7-1 SAMPLING PLAN FOR SNUBBER FUNCTIONAL TEST

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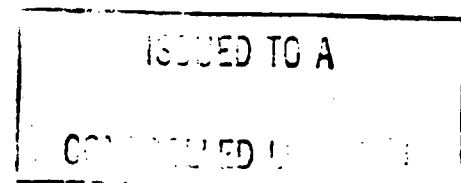
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TABLE 3.7-4a  
SAFETY RELATED HYDRAULIC SNUBBERS\*

PAUL MONROE

SYSTEM	Size (Kips)	
	543	826
RC	4	4
TOTAL	8	

\*Snubbers may be added to safety-related systems without prior License Amendment to Table 3.7-4a provided that a revision to Table 3.7-4a is included with the next License Amendment request.



NOV 15 1982

Table 3.7-4b

Safety-Related Mechanical Snubbers\*

## PACIFIC SCIENTIFIC

System	Size (Kips)							
	Small		Medium			Large		
	1/4	1/2	1	3	6	10	35	100
RC	44	8	13	40		17	12	2
ST	33	8	18	19		4	8	23
BM	19	8						
CC	17	17	11	4		5	2	
SS	39		1					
SI	85	47	51	46		21	16	1
FW	1	4	2	4		15	2	
FS	4	22	9	6				
VC	51	18	7					
CS	4	17	26	18				
SC				2		2	2	
CH		1						
CB			4					
GR	2							
CEDM				4	212			
Subtotal-1	299	150	142	143	212	64	42	26
Subtotal-2	449			497			132	
Total				1078				

\*Snubbers may be added to safety-related systems without prior License Amendment to Table 3.7-4b provided that a revision to Table 3.7-4b is included with the next License Amendment request.

ISSUED TO A  
CONTROLLED LOCATION

## 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.

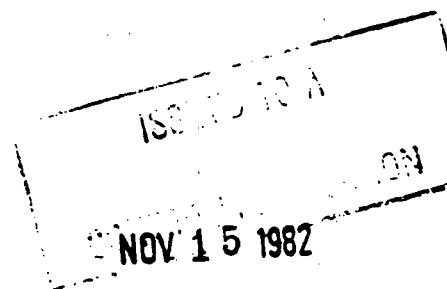
Snubbers are classified and grouped by design and manufacturer, but not by size. For example, mechanical snubbers utilizing the same design features of the 2 kip, 10 kip, and 100 kip capacity manufactured by company "A" are of the same type. The same design mechanical snubber manufactured by company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

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.

To provide assurance of snubber functional reliability, one of two sampling and acceptance criteria methods are used:

- 1) Functionally test 10% of a type of snubber with an additional 10% tested for each functional testing failure or,
- 2) Functionally test a sample size and determine sample acceptance or rejection using Figure 4.7-1.

Figure 4.7-1 was developed using "Wald's Sequential Probability Ratio Plan" as described in "Quality Control and Industrial Statistics" by Acheson J. Duncan.



## PLANT SYSTEMS

### BASES

#### SNUBBERS (Continued)

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (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 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 the snubber service life review are not intended to affect plant operation.

#### 3/4.7.7 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 or boron measuring devices) are considered to be stored and need not be tested unless they are removed from the shield mechanism.

#### 3/4.7.8 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 system consists of the water system, spray and/or sprinklers, 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.

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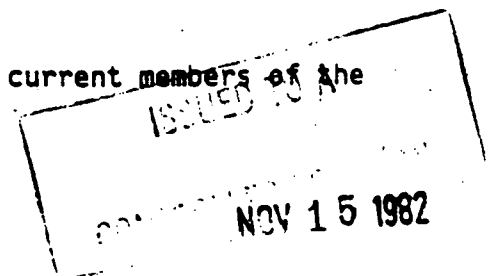
## ADMINISTRATIVE CONTROLS

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. All REPORTABLE OCCURRENCES submitted to the Commission.
- d. Records of surveillance activities; inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to the procedures required by Specification 6.8.1.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

6.10.2 The following records shall be retained for the duration of the Unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Table 5.7-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.



## ADMINISTRATIVE CONTROLS

- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the OSRC and the NSG.
- l. Records of the service lives of all snubbers listed in Tables 3.7-4a and 3.7-4b including the date at which the service life commences and associated installation and maintenance records.
- m. Records of secondary water sampling and water quality.

### 6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

### 6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Exposure Permit (REP)\*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.

\*Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the REP issuance requirement during the performance of their assigned radiation protection duties, provided they are otherwise following approved plant radiation protection procedures for entry into high radiation areas.

NOV 15 1982

ATTACHMENT C

PROPOSED TECHNICAL SPECIFICATION 3/4.7.6

SAN ONOFRE NUCLEAR GENERATING STATION

UNIT 2

## PLANT SYSTEMS

### 3/4.7.6 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

=====

- 3.7.6 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:

MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

#### ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.6.g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS

=====

- 4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

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

The first inservice visual inspection of snubbers shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers. If less than two (2) snubbers are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months  $\pm$  25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

=====

<u>No. Inoperable Snubbers 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%

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. 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.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

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d. 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 each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.6.e or 4.7.6.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.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

1. The first snubber away from each reactor vessel nozzle
2. Snubbers within 5 feet of heavy equipment (valve, pump, turbine motor, etc.)
3. Snubbers within 10 feet of the discharge from a safety relief valve.

Snubbers that are especially difficult to remove or in high radiation zones during shutdown shall also be included in the representative sample.\*

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included for the re-sampling.

\*Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)  
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e. Hydraulic Snubbers Functional Test Acceptance Criteria\*

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
2. Snubber bleed or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

f. Mechanical Snubbers Functional Test Acceptance Criteria\*

The mechanical snubber functional test shall verify that:

1. The force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel.
2. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
3. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

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

\*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.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)  
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g. Functional Test Failure Analysis (Continued)

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 4.7.6.e. or 4.7.6.f. for snubbers not meeting the functional test acceptance criteria.

h. Functional Testing of Repaired and Replaced Snubbers

Snubbers which fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers which have repairs which might affect the functional test result shall be tested to meet the functional test criteria before installation in the unit. These snubbers shall have met the acceptance criteria subsequent to their most recent service, and the functional test must have been performed within 12 months before being installed in the unit.

i. Snubber Service Life Monitoring

A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 6.10.2.1.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, the installation and maintenance records for each snubber shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be reevaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. This reevaluation, replacement or reconditioning shall be indicated in the records.



## 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.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 18 month intervals.

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

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replace, spring replace, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure 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 the snubbers service life review are not intended to affect plant operation.

## ADMINISTRATIVE CONTROLS

=====

### 6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. All REPORTABLE OCCURRENCES submitted to the Commission.
- d. Records of surveillance activities; inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to the procedures required by Specification 6.8.1.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

### 6.10.2 The following records shall be retained for the duration of the Unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient of operational cycles for those unit components identified in Table 5.7-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.

ADMINISTRATIVE CONTROLS (Continued)

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6.10.2 (Continued)

- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the OSRC and the NSG.
- l. Records of the service lives of all snubbers within the scope of Technical Specification 3/4.7.6 including the date at which the service life commences and associated installation and maintenance records.
- m. Records of secondary water sampling and water quality.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

- 6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Exposure Permit (REP)\*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:
- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
  - b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.

\*Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the REP issuance requirement during the performance of their assigned radiation protection duties, provided they are otherwise following approved plant radiation protection procedures for entry into high radiation areas.

ATTACHMENT D

PROPOSED TECHNICAL SPECIFICATION 3/4.7.6

SAN ONOFRE NUCLEAR GENERATING STATION

UNIT 3

## PLANT SYSTEMS

### 3/4.7.6 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

=====

- 3.7.6 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:

MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

#### ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.6.g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS

=====

- 4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

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

The first inservice visual inspection of snubbers shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers. If less than two (2) snubbers are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months  $\pm$  25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

=====

<u>No. Inoperable Snubbers 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%

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. 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.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

=====

d. 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 each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.6.e or 4.7.6.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.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

1. The first snubber away from each reactor vessel nozzle
2. Snubbers within 5 feet of heavy equipment (valve, pump, turbine motor, etc.)
3. Snubbers within 10 feet of the discharge from a safety relief valve.

Snubbers that are especially difficult to remove or in high radiation zones during shutdown shall also be included in the representative sample.\*

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included for the re-sampling.

\*Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

=====

e. Hydraulic Snubbers Functional Test Acceptance Criteria\*

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
2. Snubber bleed or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

f. Mechanical Snubbers Functional Test Acceptance Criteria\*

The mechanical snubber functional test shall verify that:

1. The force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel.
2. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
3. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

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

\*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.



PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)  
=====

g. Functional Test Failure Analysis (Continued)

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 4.7.6.e. or 4.7.6.f. for snubbers not meeting the functional test acceptance criteria.

h. Functional Testing of Repaired and Replaced Snubbers

Snubbers which fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers which have repairs which might affect the functional test result shall be tested to meet the functional test criteria before installation in the unit. These snubbers shall have met the acceptance criteria subsequent to their most recent service, and the functional test must have been performed within 12 months before being installed in the unit.

i. Snubber Service Life Monitoring

A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 6.10.2.1.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, the installation and maintenance records for each snubber shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be reevaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. This reevaluation, replacement or reconditioning shall be indicated in the records.

## PLANT SYSTEMS

### BASES

=====

#### 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.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 18 month intervals.

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

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replace, spring replace, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure 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 the snubbers service life review are not intended to affect plant operation.

ADMINISTRATIVE CONTROLS

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6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. All REPORTABLE OCCURRENCES submitted to the Commission.
- d. Records of surveillance activities; inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to the procedures required by Specification 6.8.1.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

6.10.2 The following records shall be retained for the duration of the Unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient of operational cycles for those unit components identified in Table 5.7-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.

## ADMINISTRATIVE CONTROLS (Continued)

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### 6.10.2 (Continued)

- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the OSRC and the NSG.
- l. Records of the service lives of all snubbers within the scope of Technical Specification 3/4.7.6 including the date at which the service life commences and associated installation and maintenance records.
- m. Records of secondary water sampling and water quality.

### 6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

### 6.12 HIGH RADIATION AREA

- 6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Exposure Permit (REP)\*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:
- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
  - b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.

\*Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the REP issuance requirement during the performance of their assigned radiation protection duties, provided they are otherwise following approved plant radiation protection procedures for entry into high radiation areas.