



10CFR 50.90  
L-2016-055  
April 4, 2016

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Renewed Facility Operating Licenses DPR-31 and DPR-41  
License Amendment Request 242  
Changes to Snubber Surveillance Requirements  
Snubber Testing Program Plan – Fifth Inspection Interval

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) hereby applies for an amendment to the Technical Specifications (TS) for Turkey Point Units 3 and 4.

The proposed amendment would revise the TS Surveillance Requirements (SR) for snubbers to conform to the Snubber Testing Program. This change will result in a consolidation of the snubber SRs under one program in accordance with the ASME OM Code, 2004 Edition with 2005 and 2006 Addenda for the Fifth Ten-Year Inservice Interval.

The enclosure to this letter provides a description and assessment of the proposed changes, the requested confirmation of applicability, and plant-specific verifications. Attachment 1 to the enclosure provides the existing TS pages marked up to show the proposed changes. Attachment 2 to the enclosure contains a detailed comparison of current TS SR 4.7.6 to the proposed Snubber Testing Program requirements and justification of changes. Attachment 3 to the enclosure provides a copy of the Fifth Interval Snubber Program Plan. Clean TS pages will be provided to the NRC Project Manager for Turkey Point upon request.

As discussed in the evaluation, the proposed changes do not involve a significant hazards consideration pursuant to 10 CFR 50.92, and there are no significant environmental impacts associated with the change.

The Turkey Point Plant Nuclear Safety Committee has reviewed the proposed license amendment. In accordance with 10 CFR 50.91(b)(1), a copy of this letter is being forwarded to the designee of the State of Florida.

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There are no new commitments made in this submission.

FPL requests NRC review and approval of this license amendment request by February 1, 2017, and implementation within 60 days after issuance.

If you have any questions on this submittal, please contact Mr. Mitch Guth, Licensing Manager, at 305-246-6698.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on *April 4*, 2016.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Summers', with a stylized flourish extending to the right.

Tom Summers  
Site Vice President  
Turkey Point Nuclear Plant

Enclosure: Evaluation of Proposed Change

cc: USNRC Regional Administrator, Region II  
USNRC Project Manager, Turkey Point Nuclear Plant  
USNRC Senior Resident Inspector, Turkey Point Nuclear Plant  
Ms. Cindy Becker, Florida Department of Health

**Turkey Point Units 3 and 4  
Docket No. 50-250 and 50-251  
Renewed Facility Operating License Nos.  
DPR-31 and DPR-41**

**ENCLOSURE**

**Evaluation of the Proposed Change**

**1.0 SUMMARY DESCRIPTION**

In accordance with the provisions of 10 CFR 50.90, Florida Power & Light Company (FPL) hereby applies for a license amendment to revise Technical Specification (TS) 3/4.7.6, Snubbers, for Turkey Point Units 3 and 4. The proposed change would revise the TS Surveillance Requirements (SR) for snubbers to conform to the revised Turkey Point Units 3 and 4 Snubber Testing Program Plan.

**2.0 DETAILED DESCRIPTION**

Turkey Point Unit 3 Fifth 10-year Inservice Testing (IST) interval began February 22, 2015. Turkey Point Unit 4 Fifth 10-year IST interval began April 15, 2015. The snubber surveillance program is being revised to comply with the latest approved edition of the ASME OM Code, Subsection ISTA and ISTD requirements. Currently, snubber testing and examination are performed in accordance with the requirements of TS 3/4.7.6. As required by 10 CFR 50.55a(b)(3)(v), FPL is implementing the OM Code and Subsection ISTD, Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants, 2004 Edition with 2005 and 2006 Addenda. The proposed changes to the Turkey Point TS are summarized below:

- Reference to TS SR 4.7.6.f in TS 3.7.6 Action would be replaced with a requirement to determine the impact of an inoperable snubber on the attached component.
- TS SR 4.7.6 would be revised to conform the specific SRs for demonstrating snubber operability to be consistent with the revised snubber testing program. The current description of requirements would be replaced by a reference to the snubber testing program in new TS 6.8.4.m.
- Add new TS 6.8.4.m, Snubber Testing Program, to the Administrative Controls section of the TS to provide a description of the snubber testing program requirements.
- An administrative page numbering change is made to TS pages 3/4 7-27 through 7-31 to reflect the revision to TS SR 4.7.6.

Mark-ups of the proposed TS pages are provided in Attachment 1. Attachment 2 contains a detailed comparison of current TS SR 4.7.6 to the proposed snubber testing program requirements and justification of the changes. Attachment 3 provides a copy of the fifth interval Snubber Testing Program Plan.

### **3.0 TECHNICAL EVALUATION**

Licensees are required by 10 CFR 50.55a(g) or 10 CFR 50.55a(b)(3)(v) to perform the Inservice Inspection (ISI) and testing of dynamic restraints (snubbers) in accordance with the ASME OM Code and the applicable addenda, except where the NRC has granted specific written relief pursuant to 10 CFR 50.55a(g)(6)(i), or authorized alternatives pursuant to 10 CFR 50.55a(z).

As noted in Regulatory Issue Summary 2010-06, licensees have the option to control the ASME Code-required ISI and testing of snubbers through their TS or other licensee-controlled documents. For plants using their TS to govern ISI and testing of snubbers, 10 CFR 50.55a(g)(5)(ii) requires that if a revised ISI program for a facility conflicts with the TS, the licensee shall apply to the Commission for amendment of the TS. Therefore, when performing 120-month program updates in accordance with 10 CFR 50.55a(g)(4), licensees must submit any required amendments to ensure their TS remain consistent with the new code of record or NRC-approved alternatives used in lieu of the Code requirements.

The proposed change replaces the specific TS requirements for snubber examination, testing and service life monitoring with a reference to the Snubber Testing Program, thereby ensuring the TS requirements remain consistent with the revised snubber testing program. A comparison between the Snubber Testing Program and the specific TS requirements is included in Attachment 2. The comparison demonstrates that the requirements of the Snubber Testing Program are equivalent to the TS requirements. This equivalence ensures that the necessary quality of snubbers is maintained, and that facility operation will continue to be within safety limits and that limiting conditions for operation will continue to be met, in accordance with 10 CFR 50.36(c)(3).

Snubbers will continue to be demonstrated OPERABLE by performance of the Snubber Testing Program. This program will be maintained in compliance with 10 CFR 50.55a in accordance with proposed TS 6.8.4.m. The program for inspection and testing of snubbers in accordance with the ASME OM Code and the applicable addenda as required by 10 CFR 50.55a(g) includes an evaluation of supported components or systems when snubbers are found to be unacceptable.

The proposed change to TS 3.7.6 Action for inoperable snubbers is administrative in nature and is required for consistency with the proposed changes to TS SR 4.7.6.

## **4.0 REGULATORY EVALUATION**

### **4.1 Applicable Regulatory Requirements**

The fifth 10-year interval for Turkey Point began for Unit 3 on February 22, 2015 and for Unit 4 on April 15, 2015.

Currently, snubber testing and examination are performed in accordance with the specific requirements of TS 3/4.7.6 and ASME OM Code Subsection ISTA and ISTD, 1998 Edition with addenda through 2000.

10 CFR 50.55a(g)(4)(ii) requires that inservice examination of components conducted during successive 120-month inspection intervals must comply with the requirements of the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b)(3), 12 months before the start of the 120-month inspection interval. If a revised ISI program for a facility conflicts with the TS for the facility, 10 CFR 50.55a(g)(5)(ii) requires licensees to apply to the Commission for amendment of the TS.

For the Turkey Point fifth 10-year interval for Units 3 and 4, as required by 10 CFR 50.55a(b)(3)(v), FPL intends to implement the latest approved edition of Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants," of the ASME OM Code, 2004 Edition with 2005 and 2006 Addenda, in place of current TS SR 3/4.7.6.

The purpose of this amendment application is to remove the specific SRs for demonstrating snubber operability from the TS since the surveillance program will be revised to include the requirements of the 2004 Edition with 2005 and 2006 addenda of the OM Code Subsection ISTD as described in the Snubber Testing Program. As such, the proposed changes to TS 3/4.7.6 are necessary to conform the TS to the revised Snubber Testing Program.

### **4.2 Precedent**

The changes proposed to TS 3/4.7.6 are similar to changes submitted by Public Service Electric and Gas (PSEG) Nuclear, LLC for Salem Generating Station, Units 1 and 2; Dominion Nuclear Connecticut (DNC), Inc for Millstone Power Station Unit 2 and Virgil C. Summer Nuclear Station (VCSNS); and FPL for Saint Lucie Nuclear Plant Units 1 and 2. The applicable references for these similar changes are provided below:

**4.2.1** PSEG Letter LR-N10-0363, License Amendment Request: Changes to Snubber Surveillance Requirements [for Salem Units 1/2], dated October 4, 2010 (Accession No. ML102780066).

**4.2.2** PSEG Letter LR-N11-0107, Response to Draft Request for

Additional Information - License Amendment Request: Changes to Snubber Surveillance Requirements [for Salem Units 1/2], dated April 7, 2011 (Accession No. ML110980107).

- 4.2.3** PSEG Letter LR-N11-0151, Response to Draft Request for Additional Information - License Amendment Request: Changes to Snubber Surveillance Requirements [for Salem Units 1/2], dated May 23, 2011 (Accession No. ML111430636).
- 4.2.4** DNC Letter 11-354, License Amendment Request to Revise Snubber Surveillance Requirements [for Millstone Power Station Unit 2], dated September 21, 2011 (Accession No. ML11270A051).
- 4.2.5** DNC Letter 12-086, Response to Request for Additional Information Regarding License Amendment Request to Revise Snubber Surveillance Requirements [for Millstone Power Station Unit 2], dated February 24, 2012 (Accession No. ML12062A069).
- 4.2.6** DNC Letter RC-13-0048, License Amendment Request -- LAR 12-06014 Changes to Snubber Surveillance Requirements [for VCSNS Unit 1], dated April 2, 2013 (Accession No. ML 13095A107).
- 4.2.7** FPL Letter L-2015-164, License Amendment Request "Fourth Ten-Year Inservice Inspection Interval License Amendment Request Changes to Snubber Surveillance Requirements," dated July 15, 2015 (Accession No. ML15198A029).
- 4.2.8** FPL Letter L-2014-077, License Amendment Request "Fourth Ten-Year Inservice Inspection Interval License Amendment Request Changes to Snubber Surveillance Requirements," dated January 30, 2014 (Accession No. ML15198A029).

A minor difference noted between the PSEG and DNC precedent license amendment requests and the Turkey Point application is that the FPL request is in response to the requirement of 10 CFR 50.55a(b)(3)(v)(B) to perform the ISI and testing of snubbers in accordance with Subsection ISTD of the ASME OM Code and the applicable addenda when using the 2006 Addenda and later editions and Addenda of Section XI of the ASME Boiler and Pressure Vessel (B&PV) Code.

The previously referenced PSEG and DNC license amendment requests were made prior to the splitting of 10 CFR 50.55a(b)(3)(v) into parts (A) and (B) with the endorsement of the 2006 Addenda of the Section XI Code, where 10 CFR 50.55a(b)(3)(v) permitted the optional use of OM Code Subsection ISTD, in place of the requirements for snubbers in the ASME B&PV Code, Section XI, Articles IWF-5200(a) and (b) and IWF-5300(a) and (b).

#### **4.3 No Significant Hazards Consideration Determination**

FPL requests adoption of an approved change to the plant specific TS for Turkey Point, to revise TS 3/4.7.6, Snubbers.

As required by 10 CFR 50.91(a), an analysis of the issue of no significant hazards consideration is presented below:

**1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?**

Response: No.

The proposed changes would revise TS SR 4.7.6 to conform the TS to the revised surveillance program for snubbers. Snubber examination, testing and service life monitoring will continue to meet the requirements of 10 CFR 50.55a(g).

Snubber examination, testing and service life monitoring is not an initiator of any accident previously evaluated. Therefore, the probability of an accident previously evaluated is not significantly increased.

Snubbers will continue to be demonstrated OPERABLE by performance of a program for examination, testing and service life monitoring in compliance with 10 CFR 50.55a or authorized alternatives. The proposed change to the TS 3.7.6 Action for inoperable snubbers is administrative in nature and is required for consistency with the proposed change to TS SR 4.7.6. The proposed change does not adversely affect plant operations, design functions or analyses that verify the capability of systems, structures, and components to perform their design functions therefore, the consequences of accidents previously evaluated are not significantly increased.

Therefore, it is concluded that this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

**2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?**

Response: No.

The proposed changes do not involve any physical alteration of plant equipment. The proposed changes do not alter the method by which any safety-related system performs its function. As such, no new or different types of equipment will be installed, and the basic operation of installed equipment is unchanged. The methods governing plant operation and testing remain consistent with current safety analysis assumptions.

Therefore, it is concluded that this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

**3. Does the proposed change involve a significant reduction in a margin of safety?**

Response: No.

The proposed changes ensure snubber examination, testing and service life monitoring will continue to meet the requirements of 10 CFR 50.55a(g). Snubbers will continue to be demonstrated OPERABLE by performance of a program for examination, testing and service life monitoring in compliance with 10 CFR 50.55a or authorized alternatives.

The proposed change to the TS 3.7.6 Action for inoperable snubbers is administrative in nature and is required for consistency with the proposed change to TS SR 4.7.6.

Therefore, it is concluded that the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, it is concluded that the proposed amendments do not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

**4.4 Conclusion**

10 CFR 50.55a(g)(4)(ii) requires that inservice examination of components conducted during successive 120-month inspection intervals must comply with the requirements of the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b) 12 months before the start of the 120-month inspection interval.

If a revised ISI program for a facility conflicts with the TS of the facility, 10 CFR 50.55a(g)(5)(ii) requires licensees to apply to the Commission for amendment of the TS to conform the TS to the revised ISI program.

The proposed change amends the TS SRs for snubbers to conform the TS to the revised snubber testing program which will meet the requirements of 10 CFR 50.55a(g) except where the NRC has granted specific written relief, pursuant to 10 CFR 50.55a(g)(6)(i), or authorized alternatives pursuant to 10 CFR 50.55a(z).

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the



health and safety of the public.

## **5.0 ENVIRONMENTAL EVALUATION**

The proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or 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 change 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 change.

## **6.0 REFERENCES**

- 6.1** NRC Regulatory Issue Summary 2010-06, "Inservice Inspection and Testing Requirements of Dynamic Restraints (Snubbers)," June 1, 2010 (Accession No. ML101310338).
- 6.2** Turkey Point Unit 3, Current Facility Operating License DPR-31, (Accession No. ML052790649)
- 6.3** Turkey Point Unit 4, Current Facility Operating License DPR-41, (Accession No. ML052790652)

**Florida Power & Light Company  
Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Renewed Facility Operating License Nos. DPR-31 and DPR-41**

**License Amendment Request 242  
Attachment 1**

**Technical Specification Mark-up  
(11 pages)**

## PLANT SYSTEMS

### 3/4.7.6 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

3.7.6 All snubbers shall be OPERABLE. The only snubbers excluded from the requirements 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:

determine the impact

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

#### SURVEILLANCE REQUIREMENTS

Snubber Testing

4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the following ~~augmented inservice inspection~~ program in addition to the requirements of Specification 4.0.5.

capitalize

a. Inspection Types

Specification 6.8.4.m in

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

b. Visual Inspections

~~Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7-2. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7-2 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before Amendment 151 and 146.~~

c. Visual Inspection Acceptance Criteria

~~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 secure, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are secure. Snubbers which appear inoperable as a result of visual~~

~~TABLE 4.7.2~~

~~SNUBBER VISUAL INSPECTION INTERVAL~~

<del>Population or Category (Notes 1 and 2)</del>	<del>NUMBER OF UNACCEPTABLE SNUBBERS</del>		
	<del>Column A Extended Interval (Notes 3 and 6)</del>	<del>Column B Repeat Interval (Notes 4 and 6)</del>	<del>Column C Reduce Interval (Notes 5 and 6)</del>
<del>1</del>	<del>0</del>	<del>0</del>	<del>1</del>
<del>80</del>	<del>0</del>	<del>0</del>	<del>2</del>
<del>100</del>	<del>0</del>	<del>1</del>	<del>4</del>
<del>150</del>	<del>0</del>	<del>3</del>	<del>8</del>
<del>200</del>	<del>2</del>	<del>5</del>	<del>13</del>
<del>300</del>	<del>5</del>	<del>12</del>	<del>25</del>
<del>400</del>	<del>8</del>	<del>18</del>	<del>36</del>
<del>500</del>	<del>12</del>	<del>24</del>	<del>48</del>
<del>750</del>	<del>20</del>	<del>40</del>	<del>78</del>
<del>1000 or greater</del>	<del>29</del>	<del>56</del>	<del>109</del>

- ~~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, the licensee must make and document that decision before any inspection and shall use that decision as the basis upon which to determine the next inspection interval for that category.~~
- ~~Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use 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 4.0.2 are applicable for all inspection intervals up to and including 48 months.~~



## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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~~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 that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.6e. 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 to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.~~

#### ~~d. Functional Tests~~

~~For each unit during refueling shutdown, a representative sample of snubbers shall be tested using the following sample plan:~~

- ~~1) At least 10% of the total number of safety related snubbers for the respective unit identified by site records 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 4.7.6e, 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;~~
- ~~2) 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 categories:~~
  - ~~A. Snubbers within 5 feet of heavy equipment (ex. valves, pumps, turbines, motors, etc.)~~
  - ~~B. Snubbers within 10 feet of the discharge from a safety relief valve.~~
- ~~3) Snubbers identified by site records as "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative sample.\*~~

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~~\*Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a 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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~~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.~~

#### ~~e. Mechanical Snubbers Functional Test Acceptance Criteria~~

~~The snubber functional test shall verify that:~~

- ~~1) Activation (restraining action) is achieved with the specified range of velocity or acceleration in both tension and compression;~~
- ~~2) Snubber release rate, where required, is within the specified range in tension and compression;~~
- ~~3) The force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel.~~

#### ~~f. 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.~~

~~If any snubber selected for functional testing either fails to activate or fails to move, i.e., frozen in place, the cause will be evaluated under the provisions of 10 CFR Part 21.~~

~~Should the results of the evaluation indicate that the failure was caused by either manufacturer or design deficiency, further action shall be taken, if needed, based on manufacturer or engineering recommendations.~~

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

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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#### g. Snubber Service Life Monitoring Program

~~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.~~

~~Concurrent with the first inservice visual inspection and during refueling shutdown thereafter, the installation and maintenance records for each safety related snubber as identified by site records 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 re-evaluation, replacement or reconditioning shall be indicated in the records.~~



## PLANT SYSTEMS

### 3/4.7.7 SEALED SOURCE CONTAMINATION

#### LIMITING CONDITION FOR OPERATION

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3.7.7 Each sealed source containing radioactive material either in excess of 100 microCuries of beta and/or gamma emitting material or 5 microCuries of alpha emitting material shall be free of greater than or equal to 0.005 microCurie of removable contamination.

APPLICABILITY: At all times.

ACTION:

- a. With a sealed source having removable contamination in excess of the above limits, immediately withdraw the sealed source from use and either:
  - 1. Decontaminate and repair the sealed source, or
  - 2. Dispose of the sealed source in accordance with Commission Regulations.
- b. The provisions of Specification 3.0.3 are not applicable.

#### SURVEILLANCE REQUIREMENTS

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4.7.7.1 Test Requirements - Each sealed source shall be tested for leakage and/or contamination by:

- a. The licensee, or
- b. Other persons specifically authorized by the Commission or an Agreement State.

The test method shall have a detection sensitivity of at least 0.005 microCurie per test sample.

4.7.7.2 Test Frequencies - Each category of sealed sources (excluding startup sources and fission detectors previously subjected to core flux) shall be tested at the frequency described below.

- a. Sources in use - in accordance with the Surveillance Frequency Control Program for all sealed sources containing radioactive materials:
  - 1) With a half-life greater than 30 days (excluding Hydrogen 3), and
  - 2) In any form other than gas.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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- b. Stored sources not in use - Each sealed source and fission detector shall be tested prior to use or transfer to another licensee unless tested within the previous 6 months. Sealed sources and fission detectors transferred without a certificate indicating the last test date shall be tested prior to being placed into use; and
- c. Startup sources and fission detectors - Each sealed startup source and fission detector shall be tested within 31 days prior to being subjected to core flux or installed in the core and following repair or maintenance to the source.

4.7.7.3 Reports - A report shall be prepared and submitted to the Commission on an annual basis if sealed source or fission detector leakage tests reveal the presence of greater than or equal to 0.005 microCurie of removable contamination.

4.7.7.4 A complete inventory of licensed radioactive materials in possession shall be maintained current at all times.

## PLANT SYSTEMS

### EXPLOSIVE GAS MIXTURE

#### LIMITING CONDITION FOR OPERATION

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3.7.8 The concentration of oxygen in the GAS DECAY TANK SYSTEM (as measured in the inservice gas decay tank) shall be limited to less than or equal to 2% by volume whenever the hydrogen concentration exceeds 4% by volume.

APPLICABILITY: At all times.

ACTION:

- a. With the concentration of oxygen in the inservice gas decay tank greater than 2% by volume but less than or equal to 4% by volume, reduce the oxygen concentration to the above limits within 48 hours.
- b. With the concentration of oxygen in the inservice gas decay tank greater than 4% by volume and the hydrogen concentration greater than 4% by volume, immediately suspend all additions of waste gases to the gas decay tanks and reduce the concentration of oxygen to less than or equal to 4% by volume, then take ACTION a., above.
- c. The provisions of Specification 3.0.3 are not applicable.

#### SURVEILLANCE REQUIREMENTS

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4.7.8 The concentrations of hydrogen and oxygen in the inservice gas decay tanks shall be determined to be within the above limits by continuously\* monitoring the waste gases in the inservice gas decay tank with the hydrogen and oxygen monitors required OPERABLE by Table 3.3-8 of Specification 3.3.3.6.

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\*When continuous monitoring capability is inoperable, Table 3.3-8 allows the use of grab samples.

## PLANT SYSTEMS

### GAS DECAY TANKS

#### LIMITING CONDITION FOR OPERATION

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3.7.9 The quantity of radioactivity contained in each gas decay tank shall be limited to less than or equal to 70,000 Curies of noble gases (DOSE EQUIVALENT Xe-133).

APPLICABILITY: At all times.

ACTION:

- a. With the quantity of radioactive material in any gas decay tank exceeding the above limit, immediately suspend all additions of radioactive material to the tank, within 48 hours reduce the tank contents to within the limit, and describe the events leading to this condition in the next Annual Radioactive Effluent Release Report, pursuant to Specification 6.9.1.4.
- b. The provisions of Specification 3.0.3 are not applicable.

#### SURVEILLANCE REQUIREMENTS

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4.7.9 The quantity of radioactive material contained in each gas decay tank shall be determined to be within the above limit at least once per 24 hours when radioactive materials are being added to the tank and the Reactor Coolant System total activity exceeds the limit of Specification 3.4.8.



## ADMINISTRATIVE CONTROLS

### PROCEDURES AND PROGRAMS (Continued)

#### I. Surveillance Frequency Control Program

This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operations are met:

- a. The Surveillance Frequency Control Program shall contain a list of frequencies of those Surveillance Requirements for which the frequency is controlled by the program.
- b. Changes to the frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The provisions of Surveillance Requirements 4.0.2 and 4.0.3 are applicable to the frequencies established in the Surveillance Frequency Control Program.

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6.8.5 DELETED

#### Snubber Testing Program

This program conforms to the examination, testing and service life monitoring for dynamic restraints (snubbers) in accordance with 10 CFR 50.55a inservice inspection (ISI) requirements for supports. The program shall be in accordance with the following:

1. This program shall meet 10 CFR 50.55a(g) ISI requirements for supports.
2. The program shall meet the requirements for ISI of supports set forth in subsequent editions of the Code of Record and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code and the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) that are incorporated by reference in 10 CFR 50.55a(b) subject to limitations and modifications listed in 10 CFR 50.55a(b) and subject to Commission approval.
3. The program shall, as required by 10 CFR 50.55a(b)(3)(v), meet Subsection ISTA, "General Requirements" and Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants".
4. The 120-month program updates shall be made in accordance with 10 CFR 50.55a(g)(4), 10 CFR 50.55a(g)(3)(v) and 10 CFR 50.55a(b) (including 10 CFR 50.55a(b)(3)(v)) subject to the conditions listed therein.

**Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Renewed Facility Operating License Nos. DPR-31 and DPR-41**

**License Amendment Request 242  
Attachment 2**

**Comparision of Current Technical Specification Requirements to  
Proposed Snubber Testing Program Requirements**

<b>Current Technical Specification (TS) Surveillance Requirement (SR)</b>	<b>Revised IST Program Requirement</b>	<b>Justification for Change</b>
<p>4.7.6 Surveillance Requirements</p> <p>Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program in addition to the requirements of Specification 4.0.5.</p>	<p>The snubber program was prepared to meet the requirements of the following subsections of the American Society of Mechanical Engineers (ASME) OM Code: 2004 Edition with 2005 and 2006 Addenda.</p>	<p>10 CFR 50.55a(b)(3)(v) Requires the use of subsection ISTD for inservice examination requirements when using the 2006 Addenda and later editions of the Code.</p>
<p>4.7.6.a Inspection Types</p> <p>As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.</p>	<p>ISTD-5252 allows for Defined Test Plan Groups (DTPG) to be established based upon differences in design, application, size, or type.</p>	<p>The revised snubber program requirements for inspection types allow the same distinction for DTPGs as SR 4.7.6.a.</p>
<p>4.7.6.b Visual Inspections</p> <p>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 4.7-2. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7-2 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before Amendment</p>	<p>ISTD-4220(a) requires all snubbers to be considered one population for examination, or alternatively, to categorize them individually as accessible or inaccessible. The categories of accessible and inaccessible snubbers shall be considered separately for examination.</p> <p>ISTD-4220(b) requires the decision to examine the snubbers as one population or as separate categories to be made and documented before the scheduled examination begins and not changed during the examination.</p>	<p>The revised snubber program requirements for categorization and schedule is equivalent to the visual inspection requirements in SR 4.7.6.b.</p>

Current Technical Specification (TS) Surveillance Requirement (SR)	Revised IST Program Requirement	Justification for Change
151 and 146.	ISTD Table 4252-1 identifies the schedule required for examination.	
<p>4.7.6.c Visual Inspection Acceptance Criteria</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 secure, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are secure.</p>	<p>ISTD-4200 states that snubbers shall be visually examined on the required schedule and evaluated to determine their operational readiness.</p> <p>ISTD-4210 requires visual examination to identify physical damage, leakage, corrosion, or degradation that may have been caused by environmental exposure or operating conditions; and those external characteristics that may indicate operational readiness of the snubber shall be examined.</p> <p>ISTD-4231 requires that examinations shall include observations for loose fasteners, or members that are corroded or deformed disconnected components or other conditions that might interfere with the proper restraint of movement. If observed these conditions shall be evaluated.</p>	<p>The revised Snubber program requirements will continue to examine the integrity of the attachments to the supporting structure.</p> <p>The revised snubber program requirements for Visual Inspection satisfy the visual inspection acceptance criteria in SR 4.7.6.c.</p>
<p>4.7.6.c Visual Inspection Acceptance Criteria (cont)</p> <p>Snubbers which appear inoperable as a result of visual inspections shall be</p>	<p>ISTD-4231 Requires snubbers evaluated to be incapable of restraining movement to be classified as unacceptable.</p> <p>ISTD-4240 permits snubbers requiring</p>	<p>The revised snubber program requirements for inservice examination is equivalent to the visual inspection acceptance criteria in SR 4.7.6.c</p>



Current Technical Specification (TS) Surveillance Requirement (SR)	Revised IST Program Requirement	Justification for Change
<p>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 that may be generically susceptible; and (2) the affected snubber is functionally tested in the as- found condition and determined OPERABLE per Specification 4.7.6e.</p>	<p>further evaluation or classified as unacceptable during inservice examination to be tested in accordance with the requirements of ISTD-5210. Results that satisfy the operational readiness test criteria of ISTD-5210 shall be used to accept the snubber, provided the test demonstrates that the unacceptable condition did not affect operational readiness.</p> <p>ISTD-4270 requires snubbers that do not meet examination requirements of ISTD-4230 shall be evaluated to determine the cause of the unacceptability.</p> <p>ISTD-4280 requires that unacceptable snubbers shall be adjusted, repaired, modified, or replaced.</p>	
<p>4.7.6.c Visual Inspection Acceptance Criteria (cont)</p> <p>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 to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the</p>	<p>ISTD-4233 requires that fluid supply or content for hydraulic snubbers shall be observed. If the fluid is less than the minimum amount, the installation shall be identified as unacceptable, unless a test establishes that the performance of the snubber is within specified limits. Tests shall be performed in accordance with ISTD-5210(b) and ISTD-5210(c). The initial test shall start with the piston at the</p>	<p>The revised snubber program requirements for inservice examination satisfy the visual inspection acceptance criteria in SR 4.7.6.c.</p>

Current Technical Specification (TS) Surveillance Requirement (SR)	Revised IST Program Requirement	Justification for Change
snubber shall be declared inoperable and the ACTION requirements shall be met.	<p>as-found setting and be performed in the extension (tension) direction, or in a mode that more closely resembles the operating and design requirements of the snubber.</p> <p>ISTD-4270 requires that snubbers that do not meet examination requirements of ISTD-4230 shall be evaluated to determine the cause of the unacceptability.</p> <p>ISTD-4280 requires that unacceptable snubbers shall be adjusted, repaired, modified, or replaced.</p>	
TABLE 4.7-2 SNUBBER VISUAL INSPECTION INTERVAL	ISTD-4252(b) requires inservice examinations to be conducted in accordance with Table ISTD-4252-1 schedule.	Table ISTD-4252-1 is equivalent to SR Table 4.7-2 for population/category population sizes and schedule interval.
<p>4.7.6.d Functional Tests</p> <p>For each unit during refueling shutdown, a representative sample of snubbers shall be tested using the following sample plan:</p> <p>1) At least 10% of the total number of safety related snubbers for the respective unit identified by site records 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</p>	<p>ISTD-5200 requires snubber operational readiness testing to be performed each fuel cycle. Testing shall be performed during normal system operation, or during system or plant outages.</p> <p>ISTD-5223 and ISTD-5224 permit snubbers to be tested in their installed location or in a bench test.</p> <p>ISTD-5261 identifies the allowable sample plans to be used for testing.</p>	<p>The frequency of snubber testing in the revised program is unchanged from the frequency specified in current SR 4.7.6.d.</p> <p>The initial sample size in the revised program is as large as the size specified in current SR 4.7.6.d.</p> <p>The revised program provides for an expanded sample of one half the initial sample be tested for each failed snubber when using the 10% test plan. Although the present program requires an additional</p>

Current Technical Specification (TS) Surveillance Requirement (SR)	Revised IST Program Requirement	Justification for Change
<p>acceptance criteria of Specification 4.7.6e, 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;</p>	<p>ISTD-5311 requires the initial sample to be 10% of the DTPG, composed according to either ISTD-5311(a) or ISTD-5311(b). ISTD-5330 requires the snubbers of each DTPG and failure mode group (FMG) to be tested as required. Testing is complete when the mathematical expressions of ISTD-5331 are satisfied, or all snubbers in the DTPG or FMG have been tested.</p> <p>ISTD-5331 requires that testing shall satisfy the mathematical expressions as follows:</p> <p>(a) for each DTPG  <math display="block">N \geq 0.1n + C(0.1n/2)</math></p> <p>(b) for each FMG  <math display="block">N_F \geq C_F(0.1n/2)</math></p>	<p>sample of 10% for each failed snubber this is not considered to be a reduction in safety since the proposed program includes an increased emphasis on service life monitoring, and this proposed test program has been previously approved in 10 CFR 50.55a(b)(3)(v) and is widely in use elsewhere.</p>
<p>4.7.6.d Functional Tests (cont.)</p> <p>2) 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 categories;</p> <p>A) Snubbers within 5 feet of heavy</p>	<p>ISTD-5311(a) requires as practicable, that the sample shall include representation from the DTPG based on the significant features (i.e., the various designs, configurations, operating environments, sizes, and capacities) and based on the ratio of the number of snubbers of each significant feature, to the total number of snubbers in the DTPG. Selection of the representative snubbers shall be random. or</p>	<p>The revised program includes sample selection that includes representation from various designs, configurations and operating environments as well as sizes and capacities. It satisfies the requirements of SR 4.7.6.d</p>

<b>Current Technical Specification (TS) Surveillance Requirement (SR)</b>	<b>Revised IST Program Requirement</b>	<b>Justification for Change</b>
<p>equipment (ex. valves, pumps, turbines, motors, etc.)</p> <p>B) Snubbers within 10 feet of the discharge from a safety relief valve.</p> <p>3) Snubbers identified by site records as “Especially Difficult to Remove” or in “High Radiation Zones During Shutdown” shall also be included in the representative sample.*</p> <p>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</p> <p>*Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a 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</p>	<p>ISTD-5311(b) The sample shall be generally representative as specified in ISTD-5311(a), but may also be selected from snubbers concurrently scheduled for seal replacement or other similar activity related to service life monitoring. The snubbers shall be tested on a generally rotational basis to coincide with the service life monitoring activity.</p> <p>ISTD-5500 requires that snubbers placed in the same location as snubbers that failed the previous inservice operational readiness test shall be retested at the time of next operational readiness testing unless the cause of the failure is clearly established and corrected.</p>	<p>Retests of failed snubber locations are required by the revised program as in SR 4.7.6.d.</p> <p>The revised program does not request any permanent exemptions from functional testing.</p>

Current Technical Specification (TS) Surveillance Requirement (SR)	Revised IST Program Requirement	Justification for Change
of their fabrication or at a subsequent date.		
<p>4.7.6.e Mechanical Snubbers Functional Test Acceptance Criteria</p> <p>The snubber functional test shall verify that:</p> <ol style="list-style-type: none"> <li>1) Activation (restraining action) is achieved with the specified range of velocity or acceleration in both tension and compression;</li> <li>2) Snubber release rate, where required, is within the specified range in tension and compression,</li> <li>3) The force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel.</li> </ol>	<p>ISTD-5210(a), (b) and (c) require verification of activation, release rate and drag force are within acceptable limits for operational readiness testing.</p>	<p>The revised snubber program requirements for snubber acceptance criteria are equivalent to those of current SR 4.7.6.e.</p>
<p>4.7.6.f Functional Test Failure Analysis</p> <p>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.</p>	<p>ISTD-5271 states that snubbers that do not meet test requirements shall be evaluated to determine the cause of the failure.</p> <p>ISTD-5272 states that snubbers found unacceptable according to operational readiness test requirements should be assigned to FMGs unless the failure is isolated or unexplained. FMGs shall include all unacceptable snubbers with the same failure mode and all other snubbers</p>	<p>The revised snubber program requirements for snubber Functional Test Failure Analysis are equivalent to those of current SR 4.7.6.f.</p>

Current Technical Specification (TS) Surveillance Requirement (SR)	Revised IST Program Requirement	Justification for Change
	with similar potential for similar failure.	
<p>4.7.6.f Functional Test Failure Analysis (cont.)</p> <p>If any snubber selected for functional testing either fails to activate or fails to move, i.e., frozen-in-place, the cause will be evaluated under the provisions of 10 CFR Part 21.</p> <p>Should the results of the evaluation indicate that the failure was caused by either manufacturer or design deficiency, further action shall be taken, if needed, based on manufacturer or engineering recommendations.</p>	<p>ISTD-1800 Requires an evaluation to be performed of the system(s) or components of which an unacceptable snubber is a part, for possible damage to the supported system or component.</p> <p>ISTD-5271 states that snubbers that do not meet test requirements shall be evaluated to determine the cause of the failure.</p> <p>ISTD-5313 States when an unacceptable snubber has not been assigned to an FMG, additional sample testing as required by ISTD-5320 is to include snubbers of the same manufacturer's design;</p>	<p>The revised snubber program requirements for Functional Test Failure Analysis are equivalent to those of current SR 4.7.6.f.</p> <p>The revised snubber program requirements when manufacturer or design deficiencies are observed requires additional testing with consideration of other snubbers by the same manufacturer.</p>
<p>4.7.6.f Functional Test Failure Analysis (cont.)</p> <p>For the snubber(s) found inoperable, an evaluation shall be performed on the components to which the inoperable snubbers are attached. The purpose of this evaluation shall be to determine if the components to which the inoperable snubber(s) are attached were adversely affected by the inoperability of the snubber(s) in order to ensure that the</p>	<p>ISTD-1800 Requires an evaluation be performed of the system(s) or components of which an unacceptable snubber is a part, for possible damage to the supported system or component.</p> <p>ISTD-5271 states that snubbers that do not meet test requirements shall be evaluated to determine the cause of the failure.</p>	<p>The revised snubber program requirements for Functional Test Failure Analysis are equivalent to those of current SR 4.7.6.f.</p>

<b>Current Technical Specification (TS) Surveillance Requirement (SR)</b>	<b>Revised IST Program Requirement</b>	<b>Justification for Change</b>
component remains capable of meeting the designed service.		
<p>4.7.6.g Snubber Service Life Monitoring Program</p> <p>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.</p> <p>Concurrent with the first inservice visual inspection and during refueling shutdown thereafter, the installation and maintenance records for each safety related snubber as identified by site records 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.</p>	<p>ISTA-9310 requires the maintenance of records in accordance with the Owners QA program.</p> <p>ISTD-6100 requires initial snubber service life to be predicted based on manufacturer's recommendation or design review.</p> <p>ISTD-6200, ISTD-6200(a) and ISTD-6200(c) requires service life to be evaluated at least once each fuel cycle. If the evaluation indicates that service life will be exceeded before the next scheduled system or plant outage, the snubber shall be replaced or reconditioned such that its service life will be extended to or beyond the next scheduled system or plant outage.</p>	<p>The revised snubber program requirements for snubber service life monitoring are equivalent to the requirements in current SR 4.7.6.g.</p>

<b>Current Technical Specification (TS) Surveillance Requirement (SR)</b>	<b>Revised IST Program Requirement</b>	<b>Justification for Change</b>
This re-evaluation, replacement or reconditioning shall be indicated in the records.	ISTA-9240 requires the Owner to maintain records of corrective action that includes a summary of the corrective actions made, the subsequent inservice test or examination, confirmation of operational adequacy	The revised snubber program requirements for snubber service life monitoring satisfy the requirements in SR 4.7.6.g.



# **Turkey Point Nuclear Plant**

## **Unit 3**

*Fifth 10-Year Interval*  
Beginning February 22, 2015  
Ending February 21, 2024

## **Unit 4**

*Fifth 10-Year Interval*  
Beginning April 15, 2015  
Ending April 14, 2024

# **Snubber Testing Program Plan**

*Revision 0*

**Florida Power & Light Company  
Turkey Point Nuclear Plant  
9760 SW 344 Street  
Homestead, FL 33035**

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## INTRODUCTION

### 1.0 Purpose

To provide requirements for the performance and administration of assessing the operational readiness of safety related dynamic restraints (Snubbers) whose specific functions are required to ensure the integrity of the reactor coolant pressure boundary or any safety-related system.

### 1.1 Scope

The program plan was prepared to meet the requirements of the following subsections of the American Society of Mechanical Engineers (ASME) OM Code 2004 Edition with 2005 and 2006 Addenda.

- Subsection ISTA, “*General Requirements*”

ISTA contains the requirements directly applicable to inservice examination and testing including the Owner’s Responsibility and Records Requirements.

- Subsection ISTD, “*Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants*”

ISTD establishes requirements for preservice and inservice examination and testing, and the service life monitoring of Dynamic Restraints (*Snubbers*) in light-water reactor nuclear power plants. The snubbers covered are required to support the systems and components that are required in shutting down a reactor to the safe shutdown condition, in maintaining the safe shutdown condition, or in mitigating the consequences of an accident.

### 1.2 Discussion

In order to ensure the required operability of all safety related snubbers for the Turkey Point Nuclear (PTN) Plants during seismic or other events initiating dynamic loads, the inspection, testing and service life monitoring of these snubbers shall be implemented and performed in accordance with the requirements of the station Snubber Testing Program Requirements.

The examination boundaries for the Snubber Program shall include the snubber assembly from pin to pin inclusive. Integral and nonintegral structural attachments for snubbers, shall be examined in accordance with the requirements of the ASME B&PV Code Section XI, Article IWF-2500(a), (b), (c) and (d) along

with the snubber assembly examination using qualified VT-3 inspectors. There will be coordination with the ISI program owner for these piping and structural attachment inspections.

The Snubber Program described in ER-AA-119 adheres to the requirements of the ASME OM Code, Subsection ISTD, 2004 Edition with 2005 and 2006 Addenda, as required by 10CFR50.55a(b)(3)(v).

Quality related snubbers installed on non-safety systems and having no impact on a safety-related system also are monitored in accordance with the plant procedure ER-AA-119, Snubber Program at the discretion of the responsible engineer.

Note that the starting dates of the fifth 10-year interval listed on the coversheet are based on the ending date of the previous interval. Actual applicability date of this Program will be based on the date that the License Amendment Request is submitted to the NRC (Ref. AR 2092853).

## **2.0 EXAMINATION, TESTING AND SERVICE LIFE MONITORING REQUIREMENTS**

- 2.1 Visual Examinations, Functional Testing, and Service Life requirements shall be performed to the extent specified within ER-AA-119 and other referenced Surveillance Procedures.
- 2.2 Snubbers are grouped into Defined Test Plan Groups (DTPGs) in accordance with ISTD-5252. Each DTPG will be tested using the 10% sample plan per ISTD-5300.
- 2.3 The service life of all snubbers shall be monitored and snubbers evaluated, replaced, or reconditioned in accordance with ISTD-6200 to ensure that the service life is not exceeded between surveillance inspections. The replacement or reconditioning of snubbers shall be documented and records retained in accordance with PTN Plant procedures.

## **3.0 EXAMINATION and TESTING METHODS**

- 3.1 Visual examinations shall be performed by individuals qualified in accordance with PTN Plant procedures. These examinations are conducted to ensure the mechanical and structural condition of the snubber support location and to observe conditions that could affect functional adequacy. Visual examinations and functional testing shall be performed to verify the requirements specified within ER-AA-119 are met in accordance with Subsection ISTD-4000 and ISTD-5000. Integral and nonintegral structural attachments for snubber assemblies shall be examined in accordance with the requirements of the ASME B&PV Code Section XI, Article IWF-2500(a), (b), (c) and (d) using qualified VT-3 inspectors.

#### **4.0 EXAMINATION and TESTING FREQUENCY**

- 4.1 Visual Examinations and Functional Testing shall be performed at the frequency specified within ER-AA-119 and ISTD-4250 and ISTD-5240. Snubbers are categorized as accessible or inaccessible during reactor operation for visual examination. Each of these categories (accessible and inaccessible) may be examined independently according to the schedule determined by Table ISTD 4252-1.
- 4.2 Code Case OMN-13, which allows the extension of the visual examination interval, will be implemented for snubber inspections during this interval. Code Case OMN-13 is approved for use in Regulatory Guide 1.192 (June 2003). The Visual Examinations of Table ISTD 4252-1 may be extended in accordance with Code Case OMN-13 once the prerequisites of the code case have been satisfied.
- 4.3 As left Visual Examinations shall be performed whenever new snubbers are installed, reinstallation of existing or swapped snubbers that were functionally tested, or after repairs, replacements or modifications.
- 4.4 Functional testing requirements for new installations or spares shall be equal to or more stringent than that specified within ISTD-5120.

#### **5.0 EXAMINATION, TESTING AND SERVICE LIFE MONITORING EVALUATION**

- 5.1 Snubbers that do not appear to conform to the Visual Examination requirements of ER-AA-119 and 0-OSP-105.1, shall be reported for evaluation and appropriate corrective action.
- 5.2 Snubbers that do not appear to conform to the visual examination acceptance requirements and are later confirmed as operable as a result of functional testing may be declared operable for the purpose of establishing the next visual inspection interval, providing that the unacceptable condition did not affect operational readiness.
- 5.3 Snubbers that do not meet the operability testing acceptance criteria outlined in ER-AA-119 and 0-OSP-105.2 shall be evaluated to determine the cause of the failure and appropriate corrective action shall be taken.
- 5.4 The service life of a snubber is predicted using manufacturer's input and contemporary information gained through consideration of the snubber service conditions and inservice functional test results. Service life monitoring program requirements of ISTD-6000 are included in ER-AA-119.

## **6.0 REPAIR, REPLACEMENT, AND MODIFICATION REQUIREMENTS**

- 6.1 Repairs, Replacements and Modifications performed on snubbers under this program shall conform, as applicable, to the requirements specified within the applicable sections of the ASME B&PV Code, Section XI.

## **7.0 SCHEDULING**

- 7.1 The Visual Examinations, Functional Testing schedules, and Service Life Replacements shall be established, tracked and maintained in accordance with ER-AA-119 and Subsection ISTD by the Snubber Engineer.
- 7.2 Controlled listings of the snubbers which are included in this program are maintained and controlled within the 0-OSP-105.1 and 0-OSP-105.2.
- 7.3 The Snubber Engineer shall identify and track expanded or additional testing and/or examinations as required by ER-AA-119 and Subsection ISTD.

## **8.0 REPORTS and RECORDS**

- 8.1 Reports and records for Visual Examinations and Functional Testing shall be maintained for all snubbers included within the Snubber Program in accordance with Section 7.0 Records, of 0-OSP-105.1, and 0-OSP-105.2 and applicable sections of ISTA and ISTD.
- 8.2 Applicable records and reports, as required for Repair and Replacements, shall be maintained.
- 8.3 Records of the service life of all snubbers listed in this program, including the date at which the service life commences or expires, and associated installation and maintenance records shall also be maintained in accordance with 0-OSP-105.1, and 0-OSP-105.2.