

ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATION CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-91-06)

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PLANT SYSTEMS

3/4.7.9 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.9. All safety-related snubbers shall be OPERABLE.

R 4.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems or partial 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 on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.9. Each safety-related snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

R 4.

a. Inspection Groups

The snubbers may be categorized into two major groups based on whether the snubbers are accessible or inaccessible during reactor operation. These major groups may be further subdivided into subgroups based on design, environment, or other features which may be expected to affect the OPERABILITY of the snubbers within the subgroup. Each subgroup ~~may~~ group may be ~~inspected~~ TESTED independently in accordance with 4.7.9.b through 4.7.9.h.

d

b. Visual Inspection Schedule and Lot Size

The first inservice visual inspection of snubbers shall be completed by October 31, 1981, and shall include all snubbers on safety-related systems. If less than two (2) snubbers are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 18 months \pm 25% from the date of the first inspection or during an outage of sufficient duration (at least 72 hours in Mode 5). Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

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WITH INSERT A

INSERT A

All of the safety-related snubbers shall be included in one population or they shall be categorized as accessible or inaccessible for visual inspection. If used, the accessible or inaccessible categories shall be considered separately for visual inspections.

When recombining categories into one population, the shorter interval of the categories shall be used.

The visual inspection interval for the population or each category shall be determined based upon the criteria provided in Table 4.7.9-1, 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 (*).

*NRC will include the number of the license amendment that implements this change.

PLANT SYSTEMS

DELETE AND REPLACE
WITH INSERT B

SURVEILLANCE REQUIREMENTS (Continued)

b. Visual Inspection Schedule and Lot Size (Continued)	
Number of Inoperable Snubbers per Inspection Period	Subsequent Visual Inspection Period*#
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. Visual Inspection Performance and Evaluation

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) bolts attaching the snubber to the foundation or supporting structure are secure, and (3) snubbers attached to sections of safety-related systems that have experienced unexpected potentially damaging transients since the last inspection period shall be evaluated for the possibility of concealed damage and functionally tested, if applicable, to confirm operability.

Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generally susceptible; and (2) the affected snubber is functionally tested, if applicable, in the as-found condition and determined OPERABLE per Specification 4.7.9.e. Hydraulic snubbers with inoperable single or common fluid reservoirs which have uncovered fluid ports shall be declared inoperable. When hydraulic snubbers which have uncovered fluid ports are tested, the tests shall be performed by starting with the piston at the as-found setting and extending the piston rod in the extension mode direction.

Also, snubbers which have been made inoperable as the result of unexpected transients, isolated damage or other such random events, when the provisions of 4.7.9.g and 4.7.9.h have been met and any other appropriate corrective action implemented, shall not be counted in determining the next visual inspection interval.

d. Functional Test Schedule, Lot Size, and Composition

During each refueling outage, a representative sample of 10% of the total of the safety-related snubbers in use in the plant shall be functionally tested either in place or in a bench test.

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

The provisions of Specification 4.0.2 are not applicable.

TABLE 4.7.9-1
SNUBBER VISUAL INSPECTION INTERVAL

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

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)

d. Functional Test Schedule, Lot Size, and Composition (Continued)

The representative sample selected for functional testing shall include the various configurations, operating environments, and the range of size and capacity of snubbers within the groups or subgroups. The representative sample should be weighted to include more snubbers from severe service areas such as near heavy equipment. Unless a failure analysis as required by 4.7.9.f indicates otherwise, the sample shall be a composite based on the ratio of each group to the total number of snubbers installed in the plant. 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.

The security of fasteners for attachment of the snubbers to the component and to the snubber anchorage shall be verified on snubbers selected for functional tests.

e. 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 where required, is present in both tension and compression, within the specified range.

3. The force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel. Also, the increase in the force required shall not exceed 50 percent of the amount required at the last surveillance test of that snubber, provided that the force required is at least 25 pounds.

DELETE

4. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

5. 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.

f. Functional Test Failure Analysis and Additional Test Lots

If any snubber selected for functional testing either fails to lock up or fails to move due to manufacture or design deficiency, all snubbers of the same design subject to the same defect shall be functionally tested

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PLANT SYSTEMS

BASES

SNUBBERS (Continued)

that may be generically susceptible and operability verified by inservice functional testing, if applicable, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

TEST ~~Inspection~~ groups may be established based on design features and installed conditions which may be expected to be generic. Each of these ~~groups~~ ~~are~~ ~~inspected and~~ ~~tested~~ ~~separately~~ ~~unless~~ ~~an~~ ~~engineering~~ ~~analysis~~ ~~indicates~~ ~~the~~ ~~inspection~~ ~~group~~ ~~is~~ ~~improperly~~ ~~constituted~~. All suspect snubbers are subject to inspection and testing regardless of ~~inspection~~ groupings.

~~Delete~~ To further increase the assurance of snubber reliability, functional tests shall be performed during each refueling outage. These tests will include stroking of the snubbers to verify proper movement, activation, and bleed or release. The performance of hydraulic snubbers generally depends on a clean, deaerated fluid contained within variable pressure chambers, flowing at closely controlled rates. Since these characteristics are subject to change with exposure to the reactor environment, time, and other factors, their performance within the specified range should be verified. Mechanical snubbers which depend upon overcoming the inertia of a mass and the braking action of a capstan spring contained within the snubber for limiting the acceleration of the attached component (within the load rating of the snubber) are not subject to changes in performance in the same manner as hydraulic snubbers. Pending the development of information regarding the change during the service of the snubber of the acceleration/resistance relationship and the optimum method for detecting this change, these mechanical snubbers may be tested to verify that when subjected to a large change in velocity the resistance to movement increases greatly. The performance change information ~~is to be developed~~ in order to establish test methods to be used during and after the first refueling outage.

~~Delete~~ Ten percent of the total population of ~~approximately 700~~ snubbers is an adequate sample for functional tests. The initial sample is to be proportioned among the groups in order to obtain a representative sample. Observed failures of more than two snubbers in the initial lot will require an engineering analysis and testing of additional snubbers selected from snubbers likely to have the same defect. A thorough inspection of the snubber threaded attachments to the pipe or components and the anchorage will be made in conjunction with all required functional tests.

~~Delete~~ A list of individual snubbers with detailed information of snubber location and size shall be available at the plant in accordance with Section 50.71(c) of 10 CFR Part 50. The accessibility of each snubber shall be determined and approved by the Plant Operations Review Committee. The determination shall be based upon the existing radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere).

R43

PLANT SYSTEMS

3/4.7.9 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.9 All safety-related snubbers shall be OPERABLE.

R31

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems or partial 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 on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.9 Each safety-related snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

R31

a. Inspection Groups

The snubbers may be categorized into two major groups based on whether the snubbers are accessible or inaccessible during reactor operation. These major groups may be further subdivided into subgroups based on design, environment, or other features which may be expected to affect the OPERABILITY of the snubbers within the subgroup. Each subgroup ~~or group~~ may be ~~inspected~~ ^{TESTED} independently in accordance with 4.7.9.a through 4.7.9.h.

b. Visual Inspection Schedule

~~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 on safety-related systems. If less than two (2) snubbers are found inoperable during the first inservice~~

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PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

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b. Visual Inspection Schedule (Cont'd)

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:

R2

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B

Number of Inoperable Snubbers per Inspection Period	Subsequent Visual Inspection Period*#
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. Visual Inspection Performance and Evaluation

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) bolts attaching the snubber to the foundation or supporting structure are secure, and (3) snubbers attached to sections of safety-related systems that have experienced unexpected potentially damaging transients since the last inspection period shall be evaluated for the possibility of concealed damage and functionally tested, if applicable, to confirm operability.

Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested, if applicable, in the as-found condition and determined OPERABLE per Specification 4.7.9.e. Hydraulic snubbers with inoperable single or common fluid reservoirs which have uncovered fluid ports shall be declared inoperable. When hydraulic snubbers which have uncovered fluid ports are tested, the tests shall be performed by starting with the piston at the as-found setting and extending the piston rod in the extension mode direction.

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

#The provisions of Specification 4.0.2 are not applicable.

INSERT A

All of the safety-related snubbers shall be included in one population or they shall be categorized as accessible or inaccessible for visual inspection. If used, the accessible or inaccessible categories shall be considered separately for visual inspections.

When recombining categories into one population, the shorter interval of the categories shall be used.

The visual inspection interval for the population or each category shall be determined based upon the criteria provided in Table 4.7.9-1, and the first inspection interval determined using this criterion shall be based upon the previous inspection interval as established by the requirements in effect before amendment (*).

*NRC will include the number of the license amendment that implements this change.

TABLE 4.7.9-1
SNUBBER VISUAL INSPECTION INTERVAL

INSERT D

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

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)

c. Visual Inspection Performance and Evaluation (Cont'd)

Also, snubbers which have been made inoperable as the result of unexpected transients, isolated damage or other such random events, when the provisions of 4.7.9.g and 4.7.9.h have been met and any other appropriate corrective action implemented, shall not be counted in determining the next visual inspection interval.

d. Functional Test Schedule, Lot Size, and Composition

During each refueling outage, a representative sample of 10% of the total of the safety related snubbers in use in the plant shall be functionally tested either in place or in a bench test.

R2

The representative sample selected for functional testing shall include the various configurations, operating environments, and the range of size and capacity of snubbers within the groups or subgroups. The representative sample should be weighted to include more snubbers from severe service areas such as near heavy equipment. Unless a failure analysis as required by 4.7.9.f indicates otherwise, the sample shall be a composite based on the ratio of each group to the total number of snubbers installed in the plant. 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.

The security of fasteners for attachment of the snubbers to the component and to the snubber anchorage shall be verified on snubbers selected for functional tests.

e. 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 where required, is present in both tension and compression, within the specified range.
3. The force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel.

~~Also, the increase in the force required shall not exceed~~

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PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

e. Functional Test Acceptance Criteria (Cont'd)

DELETE

50 percent of the amount required at the last surveillance test of that snubber, provided that the force required is at least 25 pounds.

4. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.
5. 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.

f. Functional Test Failure Analysis and Additional Test Lots

If any snubber selected for functional testing either fails to lock up or fails to move due to manufacture or design deficiency, all snubbers of the same design subject to the same defect shall be functionally tested.

If more than two snubbers do not meet the functional test acceptance criteria, an additional lot equal to one-half the original lot size shall be functionally tested for each failed snubber in excess of the two allowed failures. An engineering evaluation shall be made of each failure to meet the functional test acceptance criteria to determine the cause of the failure. The result of this analysis shall be used, if applicable, in selecting snubbers to be tested in the subsequent lot in an effort to determine the operability of other snubbers which may be subject to the same failure mode. (Selection of snubbers for future testing may also be based on the failure analysis.) Testing shall continue until not more than one additional inoperable snubber is found within a subsequent required lot, or all snubbers of the original inspection group have been tested, or all suspect snubbers identified by the failure analysis have been tested, as applicable.

The discovery of loose or missing attachment fasteners ^{WILL} be evaluated to determine whether the cause may be localized or generic. The result of the evaluation ☒ will be used to select other suspect snubbers for verifying the attachment fasteners, as applicable.

Snubbers shall not be subjected to prior maintenance specifically for the purpose of meeting functional test requirements.

PLANT SYSTEMS

BASES

3/4.7.9 SNUBBERS (cont'd)

When the cause of the rejection of a snubber in a visual inspection is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible and operability verified by inservice functional testing, if applicable, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration. ~~Inspection~~ groups may be established based on design features and installed conditions which may be expected to be generic. Each of these ~~inspection~~ groups are ~~inspected and~~ - TEST tested separately unless an engineering analysis indicates the ~~inspection~~ group is improperly constituted. All suspect snubbers are subject to inspection and testing regardless of ~~inspection~~ groupings. DELETE

To further increase the assurance of snubber reliability, functional tests shall be performed during each refueling outage. These tests will include stroking of the snubbers to verify proper movement, activation, and bleed or release. The performance of hydraulic snubbers generally depends on a clean, deaerated fluid contained within variable pressure chambers, flowing at closely controlled rates. Since these characteristics are subject to change with exposure to the reactor environment, time, and other factors, their performance within the specified range should be verified. Mechanical snubbers which depend upon overcoming the inertia of a mass and the braking action of a capstan spring contained within the snubber for limiting the acceleration of the attached component (within the load rating of the snubber) are not subject to changes in performance in the same manner as hydraulic snubbers. Pending the development of information regarding the change during the service of the snubber of the acceleration/resistance relationship and the optimum method for detecting this change, these mechanical snubbers may be tested to verify that when subjected to a large change in velocity the resistance to movement increases greatly. The performance change information ~~is to be~~ developed in order to establish test methods to be used during and ~~after~~ the first refueling outage. DELETE was

Ten percent of the total population of ~~approximately 700~~ snubbers is an adequate sample for functional tests. The initial sample is to be proportioned among the groups in order to obtain a representative sample. Observed failures of more than two snubbers in the initial lot will require an engineering analysis and testing of additional snubbers selected from snubbers likely to have the same defect. A thorough inspection of the snubber threaded attachments to the pipe or components and the anchorage will be made in conjunction with all required functional tests.

BASES

3/4.7.9 SNUBBERS (cont'd)

DELETE A list of individual snubbers with detailed information of snubber location and size shall be available at the plant in accordance with Section 50.71(c) of 10 CFR Part 50. The accessibility of each snubber shall be determined ~~and approved by the Plant Operations Review Committee. The determination shall be~~ based upon the existing radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location etc.), and the recommendations of Regulatory Guide 8.8 and 8.10. The addition or deletion of any hydraulic or mechanical snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

R31

3/4.7.10 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, 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 shielded mechanism.

ENCLOSURE 2

PROPOSED TECHNICAL SPECIFICATION CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-91-06)

DESCRIPTION AND JUSTIFICATION FOR REVISIONS TO
TECHNICAL SPECIFICATION 3/4.7.9 - SNUBBERS

Description of Change

TVA proposes to modify the Sequoyah Nuclear Plant (SQN) Units 1 and 2 Technical Specifications (TSs) pertaining to the safety-related snubber inspection and testing program as described in TS 3/4.7.9.

Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," provides guidance to revise Surveillance Requirement (SR) 4.7.9 and the associated bases pertaining to the visual inspection schedule. This guidance consists of replacing the TS frequency table with an alternate table including the associated notes. The new table will provide for an extension or reduction of the inspection interval based upon previous inspection results.

SR 4.7.9.a has been revised to reflect the difference in the functional testing and visual inspection programs that is required by this implementation of GL 90-09. This change is also reflected in the bases section.

SR 4.7.9.e.3 has been revised to eliminate the 50 percent increase in drag force statement.

In the bases section of TS 3/4.7.9, the Plant Operation Review Committee (PORC) is denoted as determining and approving the addition and deletion of snubbers to the accessible or inaccessible list. TVA is proposing to delete this reference.

The wording "approximately 700" has been deleted from the third paragraph of the bases section, page B 3/4 7-6 for both units. In addition, a tense change has been made in the last sentence of the second paragraph on this same page to reflect that SQN is now past the first refueling outage.

Page 3/4 7-24 of the Unit 2 TS has a typographical error corrected (will to will).

Reason for Change

As discussed in GL 90-09, it has been recognized that the current snubber visual inspection schedule imposes significant resource requirements throughout the industry. These resource expenditures for visual inspection provide little added assurance of snubber operability above that provided by the required functional testing. For this reason, NRC has proposed a change in the schedule for performing visual inspections. TVA concurs with the results of GL 90-09.

With the issuance of GL 90-09, it became apparent that the functional testing and the visual inspection programs had different requirements for breaking down the population of snubbers. Visual inspections are relevant to the total population or are broken down into either accessible or inaccessible. No further breakdown is allowed for visual inspection. Functional testing grouping is based upon design, environment, or other features that may be expected to affect the operability of the snubber. This required SQN to change SR 4.7.9.a to define the differences.

SR 4.7.9.e.3 requires that the force required to initiate or maintain motion of the snubber is within the specified range in both directions of

travel. This functional test is performed to determine if the snubber is capable of performing its intended design function. SR 4.7.9.e.3 further states that the increase in the drag force shall not exceed 50 percent of the amount at the last surveillance test. However, this criterion is not for the purpose of ascertaining if the snubber is operable, but to determine if a trend exists that is indicative of pending snubber failure. In accordance with the bases section of TS 4.0.1, the SR is intended to determine operability for the subject system, thus the second sentence of SR 4.7.9.e.3 has been proposed to be deleted. This deletion is consistent with NRC observations identified in Inspection Report No. 50-327,328/86-67.

The PORC review of changes to the accessible or inaccessible listing per the bases section of TS 3/4.7.9 is an unnecessary and outdated requirement. Since the initial development of these TS bases, SQN has implemented a Qualified Reviewer (QR) Program per TS 6.5.1A. Changes in procedures governing the accessibility of snubbers are reviewed through the QR process.

SQN is proposing to remove the wording "approximately 700" from the bases section since this number is no longer valid. Through various modifications to each unit, the number has changed.

Justification for Change

The functional tests provide an acceptable confidence level that the safety-related snubbers will be operable. The visual inspection is a separate process that was developed to complement the functional testing program and to increase the confidence level of snubber operability. Based upon the Brookhaven National Laboratory report reviewed by NRC, very few snubbers were found inoperable because of the visual inspection; and accordingly, NRC justified a revised schedule for visual inspections. As CL 90-09 indicates, several utilities, including SQN, have spent a significant amount of resources performing visual inspections. Also, plant personnel have been subjected to additional radiological exposure to comply with the required inspections. By substituting the new visual inspection schedule, SQN will be reducing future occupational radiation exposure. Implementation of this new schedule is consistent with NRC's policy statement on TS improvements.

The placement of the "50 percent increase in the drag force" statement in SR 4.7.9.e.3 is inappropriate as it does not identify inoperable snubbers, but rather may be indicative of an adverse trend. The drag force increase of greater than 50 percent is addressed in SR 4.7.9.i that requires the life of mechanical snubbers to be monitored. Mechanical snubbers may have a greater than 50 percent increase in drag force and still remain within the design limits. This trend for mechanical snubbers is addressed in SR 4.7.9.i where the approach to "end of service life" is required to be tabulated and reviewed. As a note of clarification, hydraulic snubbers are not included since they traditionally fail from fluid leakage that decreases the drag force. Thus, elimination of the second sentence in SR 4.7.9.e.3 removes potential confusion in applying the SR while SR 4.7.9.i maintains the surveillance trending.

SQN is proposing to remove reference to PORC from the approval process when a snubber is added or deleted to the accessible or inaccessible list for visual inspections. TS 6.5.1A describes SQN's QR Program, which has been added since the requirement for PORC approval. By subjecting the snubber procedures to be reviewed by qualified personnel, the minor changes required from future modifications and procedure changes will be reviewed in sufficient detail. This is a bases change only.

The removal of "approximately 700" from the bases does not change the program description. As a result of the removal of the upper head injection system, resistance thermal detector bypass piping, and various other plant modifications, the snubber population has decreased to approximately 500. Replacement of the "700" with another number would be of little benefit since it will continue to change as SQN implements other system modifications. This is also a bases change only.

Environmental Impact Evaluation

The proposed change request does not involve an unreviewed environmental question because operation of SQN Units 1 and 2 in accordance with this change would not:

1. Result in a significant increase in any adverse environmental impact previously evaluated in the Final Environmental Statement (FES) as modified by the staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or decisions of the Atomic Safety and Licensing Board.
2. Result in a significant change in effluent or power levels.
3. Result in matters not previously reviewed in the licensing basis for SQN that may have a significant environmental impact.

ENCLOSURE 3

PROPOSED TECHNICAL SPECIFICATION CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-91-06)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Significant Hazards Evaluation

TVA has evaluated the proposed technical specification (TS) changes and has determined that they do not represent a significant hazards consideration based on criteria established in 10 CFR 50.92(c). Operation of Sequoyah Nuclear Plant (SQN) in accordance with the proposed amendment will not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed wording changes to SR 4.7.9.a resulted from a need for clearer definition of the snubber visual and functional testing program. The proposed change to SR 4.7.9.e.3 does not involve a significant increase in the probability or consequences of an accident previously evaluated. This SR addresses the operability of a snubber. During the functional test, the mechanical snubber may display an increase of 50 percent or more in drag force and still remain within its design limits. This increase in drag force for mechanical snubbers displays a trend. This trending is addressed in SR 4.7.9.i where the approach to "end of service life" is required to be tabulated and reviewed.

The proposed schedule for visual inspection of snubbers was developed by NRC and published in Generic Letter (GL) 90-09, "Alternative Requirements For Snubber Visual Inspection Intervals and Corrective Actions." The operability of snubbers is predominately determined by functional testing for which SQN has an approved program. Based upon the Brookhaven National Laboratory report reviewed by NRC, very few snubbers were found inoperable because of the visual inspection; and accordingly, NRC justified a revised schedule for visual inspections. Since the testing program and inspection still provide the appropriate confidence level of operability, there is no significant increase in the probability or consequences of an accident previously analyzed.

2. Create the possibility of a new or different kind of accident from any previously analyzed.

Based upon GL 90-09, NRC has addressed these proposed changes to the visual inspection program, and the confidence level for operability remains the same. Additionally, the other changes in the SRs do not affect operability. These changes do not alter any plant operations, maintenance requirements, or system design or functions. Therefore, no new or different accidents are created from the proposed change.

3. Involve a significant reduction in a margin of safety.

The proposed change in the visual inspection program for snubbers does not make modifications to the plant or revise its mode of operation or the present safety analysis. As previously described with the proposed changes to the SRs, the confidence level for snubber operability remains the same; therefore, there is no significant reduction in any safety margin.