

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

2. Snubber bleed, or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

e. Mechanical Snubbers Functional Test Acceptance Criteria*

The mechanical snubber functional test shall verify that:

1. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force.
2. Activation (restraining action) is achieved within the specified range in both tension and compression.
3. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

*This portion of the specification is effective prior to startup following the fifth refueling outage.

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fifth

ATTACHMENT 2

Safety Evaluation for Proposed Change to the FNP - Technical Specifications Section 4.7.9.e

I. Background

J. M. Farley Nuclear Plant - Unit 1 is required to functionally test mechanical snubbers per Technical Specification 4.7.9.e effective prior to startup following the fourth refueling outage. Such functional testing of mechanical snubbers cannot be implemented due to the unavailability of a suitable test machine for purchase, delivery, setup and personnel training in a time compatible with the Unit 1 fourth refueling outage. Suitable test machines have only recently become available for purchase. The design and manufacture of test machines has undergone rapid development and frequent change. This has forced Alabama Power Company to continuously review and consider the various designs available. Due to the factors involved in mechanical snubber testing, and in consideration of rapid machine development, the first machine which Alabama Power Company considers capable of satisfactorily performing the functional test was completed and proven functional in June 1982. Since this time, other suitable machines have become commercially available. Alabama Power Company has issued a bid specification for a test machine which will have the capability of functionally testing mechanical snubbers in accordance with the provisions of Technical Specification 4.7.9.e. Once the procurement process is completed and a purchase order is issued, machine delivery is expected to take six (6) months. Following test machine delivery, a test facility must be completed and personnel must be trained, before beginning functional testing of mechanical snubbers. Based on the unavailability for purchase and setup of a suitable test machine until after the fourth refueling outage, Alabama Power Company proposes to postpone the functional testing of mechanical snubbers until the fifth refueling outage.

II. Reference:

- (1) FNP Unit 1 Technical Specification 4.7.9.e.

III. Basis:

It is proposed to change the footnote of Technical Specification 4.7.9.e to require implementation of mechanical snubber functional testing effective prior to startup following the fifth refueling outage. This change will allow Alabama Power Company sufficient time to procure, receive and install a suitable onsite test machine, and to develop training programs and testing procedures necessary for an effective testing program.

In lieu of functional testing, the mechanical snubbers will be visually inspected in accordance with Technical Specifications 4.7.9.a and 4.7.9.b. These inspections will verify operability of the mechanical snubbers by determining that there are no visible indications of damage or impaired operability and that attachments to the foundation or supporting structure are secure. Mechanical snubbers which appear inoperable as a result of visual inspection, and which cannot be verified as being operable in accordance with Technical Specification 4.7.9.b will be replaced with an operable snubber.

IV. Conclusion:

The proposed change to the Unit 1 Technical Specification allows Alabama Power Company to develop mechanical snubber testing capability on a reasonable schedule. Since existing visual inspections continue to provide assurance of snubber operability, it is the judgement of Alabama Power Company that this change does not involve an unreviewed safety question as defined by 10 CFR 50.59.