

ATTACHMENT B

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a. Inspection Types

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

b. Visual Inspections

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 4.7.9-1. The visual inspection interval for each type of snubber 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 ().

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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 functional, and (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of visual 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 irrespective of type that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.9f. 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 and documented 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.

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

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INSERT C

The visual inspection frequency is based upon maintaining a constant level of snubber protection to the safety-related systems, as given in Generic Letter 90-09, Alternative Visual Inspection Intervals and Corrective Actions. Therefore, the required schedule is based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of various snubber populations or categories. The visual inspection interval for each type of snubber 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.

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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 the 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.

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TABLE 4.7.9-1
SNUBBER VISUAL INSPECTION INTERVAL

- 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.

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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 the 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.

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TABLE 4.7.9-1
SNUBBER VISUAL INSPECTION INTERVAL

- 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.

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3/4.7.9 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.9 All hydraulic and mechanical snubbers shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3. OPERATIONAL CONDITIONS 4 and 5 for snubbers located on systems required OPERABLE in those OPERATIONAL CONDITIONS.

ACTION:

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

a. Inspection Types

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

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these groups (inaccessible and accessible) may be inspected independently according to the schedule below. The first inservice visual inspection of each type of snubber shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all hydraulic and mechanical snubbers. If all snubbers of each type on any system are found OPERABLE during the first inservice visual inspection, the second inservice visual inspection of that system shall be performed at the first refueling outage. Otherwise, subsequent visual inspections of a given system shall be performed in accordance with the following schedule:

<u>No. Inoperable Snubbers of Each Type On Any System per Inspection Period</u>	<u>Subsequent Visual Inspection Period*#</u>
0	18 months - 50% + 25%
1	12 months ± 25%
2	6 months ± 25%
3,4	124 days ± 25%
5,6,7	62 days ± 25%
8 or more	31 days ± 25%

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

#The provisions of Specification 4.0.2 are not applicable.

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SURVEILLANCE REQUIREMENTS (Continued)

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: there are no visible indications of damage or impaired OPERABILITY and (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are secure. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, provided that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type on that system that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.9f. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers. For those snubbers common to more than one system, the OPERABILITY of such snubbers shall be considered in assessing the surveillance schedule for each of the related systems.

d. Transient Event Inspection

An inspection shall be performed of all hydraulic and mechanical snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems within 6 months following such an event. In addition to satisfying the visual inspection acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.

e. Functional Tests

During the first refueling shutdown and thereafter during shutdown, a representative sample of snubbers shall be tested using one of the following sample plans. The sample plan shall be selected prior to the test period and cannot be changed during the test period. The NRC Regional Administrator shall be notified in writing of the sample plan selected prior to the test period or the sample plan used in the prior test period shall be implemented:

- 1) At least 10% of the total of each type of snubber 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 4.7.9f., an additional 10% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested; or
- 2) A representative sample of each type of snubber shall be functionally tested, in accordance with Figure 4.7-1. "C" is the

*The second functional test surveillance shall be conducted 18 months from the commencement of power operation for cycle 2.

PLANT SYSTEMS

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SNUBBERS (Continued)

snubber shall be determined and approved by the Onsite Review and Investigative Function. 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.

INSERT C

The visual inspection frequency is based upon maintaining a constant level of snubber protection to each safety-related system. Therefore, the required inspection interval varies inversely with the observed snubber failures on a given system and is determined by the number of inoperable snubbers found during an inspection of each system. In order to establish the inspection frequency for each type of snubber on a safety-related system, it was assumed that the frequency of snubber failures and initiating events is constant with time and that the failure of any snubber on that system could cause the system to be unprotected and to result in failure during an assumed initiating event. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

The acceptance criteria are to be used in the visual inspection to determine OPERABILITY of the snubbers. For example, if a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be declared inoperable and shall not be determined OPERABLE via functional testing.

ACCEPTABLE

UNACCEPTABLE

To provide assurance of snubber functional reliability, one of three functional testing methods is used with stated acceptance criteria:

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

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3/4.7.9 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.9 All hydraulic and mechanical snubbers shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3. OPERATIONAL CONDITIONS 4 and 5 for snubbers located on systems required OPERABLE in those OPERATIONAL CONDITIONS.

ACTION:

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

a. Inspection Types

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

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these groups (inaccessible and accessible) may be inspected independently according to the schedule below. The first inservice visual inspection of each type of snubber shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all hydraulic and mechanical snubbers. If all snubbers of each type on any system are found OPERABLE during the first inservice visual inspection, the second inservice visual inspection of that system shall be performed at the first refueling outage. Otherwise, subsequent visual inspections of a given system shall be performed in accordance with the following schedule:

<u>No. Inoperable Snubbers of Each Type On Any System per Inspection Period</u>	<u>Subsequent Visual Inspection Period*#</u>
0	18 months - 50% + 25%
1	12 months ± 25%
2	6 months ± 25%
3,4	124 days ± 25%
5,6,7	62 days ± 25%
8 or more	31 days ± 25%

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

#The provisions of Specification 4.0.2 are not applicable.

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SURVEILLANCE REQUIREMENTS (Continued)

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: there are no visible indications of damage or impaired OPERABILITY and (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are secure. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, provided that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type on that system that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.9f. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers. For those snubbers common to more than one system, the OPERABILITY of such snubbers shall be considered in assessing the surveillance schedule for each of the related systems.

d. Transient Event Inspection

An inspection shall be performed of all hydraulic and mechanical snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems within 6 months following such an event. In addition to satisfying the visual inspection acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.

e. Functional Tests

During the first refueling shutdown and at least once per 18 months thereafter during shutdown, a representative sample of snubbers shall be tested using one of the following sample plans. The sample plan shall be selected prior to the test period and cannot be changed during the test period. The NRC Regional Administrator shall be notified in writing of the sample plan selected prior to the test period or the sample plan used in the prior test period shall be implemented:

- 1) At least 10% of the total of each type of snubber 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 4.7.9f., an additional 10% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested; or
- 2) A representative sample of each type of snubber shall be functionally tested, in accordance with Figure 4.7-1. "C" is the

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SNUBBERS (Continued)

A list of individual snubbers with detailed information of snubbers location and size and of system affected 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 Onsite Review and Investigative Function. 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.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to each safety-related system. Therefore, the required inspection interval varies inversely with the observed snubber failures on a given system and is determined by the number of inoperable snubbers found during an inspection of each system. In order to establish the inspection frequency for each type of snubber on a safety-related system, it was assumed that the frequency of snubber failures and initiating events is constant with time and that the failure of any snubber on that system could cause the system to be unprotected and to result in failure during an assumed initiating event. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

The acceptance criteria are to be used in the visual inspection to determine OPERABILITY of the snubbers. For example, if a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be declared inoperable and shall not be determined OPERABLE via functional testing.

To provide assurance of snubber functional reliability, one of three functional testing methods is used with stated acceptance criteria:

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

ATTACHMENT C

SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison Company has evaluated the proposed Technical Specification Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of LaSalle County Station Units 1 and 2 (LaSalle) in accordance with the proposed amendment will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because:

The proposed schedule for snubber visual inspection intervals will maintain the same level of confidence as the existing schedule as documented in Generic Letter 90-09, Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions, dated December 11, 1990. Also, the surveillance requirement and schedule for snubber functional testing remains the same providing a 95 percent confidence level that 90 to 100 percent of the snubbers operate within the specified limits. The proposed visual inspection schedule is separate from functional testing and adds to the confidence level that the installed snubbers will serve their design function and are being maintained operable. Accident analyses assume that snubbers are initially operable, and by complying with the Technical Specification Surveillance Requirements for functional testing in conjunction with the revised visual inspection schedule assure continued operability of the snubbers. Therefore, no initial assumptions are being changed and thus neither the probability nor consequences of any accidents previously evaluated are significantly increased.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because:

The proposed schedule for snubber visual inspection intervals will maintain the same level of confidence as the existing schedule as documented in Generic Letter 90-09, Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions, dated December 11, 1990. Also, the surveillance requirement and schedule for snubber functional testing remains the same providing a 95 percent confidence level that 90 to 100 percent of the snubbers operate within the specified limits. The proposed visual inspection schedule is separate from functional testing and adds to the confidence level that the installed snubbers will serve their design function and are being maintained operable. As a result, the supported piping, components, etc. will be maintained OPERABLE, so that supported safety systems will perform as designed. Also, this amendment is not a modification or the result of a modification to the facility. Therefore, the possibility of a new or different kind of accident is not created.

ATTACHMENT C

SIGNIFICANT HAZARDS CONSIDERATION

- 3) Involve a significant reduction in the margin of safety because:
- a) Through the current snubber functional testing and the revised snubber visual inspection schedule and the associated corrective action requirements, the proposed amendment maintains the same level of confidence as the current technical specification that snubbers are operable.
 - b) Initially, since the new schedule begins at the same frequency or interval specified by the current surveillance schedule, the effect on snubber operability confidence level will be neutral or negligible during the transition to the new means of determining snubber visual inspection frequency.
 - c) Provided there continue to be zero or few snubber visual inspection failures, the amendment will allow snubber visual inspections to continue to coincide with planned outages and will reduce personnel radiation exposure. LaSalle has not had snubber visual inspection failures to date, so that inspections have been performed during planned outages. However, as a result of this change, there is a lower potential for special unit outages required for the sole purpose of snubber inspection, thus the units will be subjected to fewer shutdowns and startups, which in itself increases the margin of safety.

Therefore, there is no significant reduction in the margin of safety.

Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Considerations," Final Rule, 51 FR 7744, for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not considered likely to involve significant hazards considerations. This proposed Waiver of Compliance most closely fits the example of a change which may either result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. The Standard Review Plan, Section 3.9.3, paragraph 3.b.(6) states:

"Inservice inspection and testing are critical elements of operability assurance programs for mechanical components. The applicant should provide a discussion of accessibility provisions for maintenance, inservice inspection and testing, and possible repair or replacement of snubbers consistent with the requirements of the NRC Standard Technical Specifications."

Since this proposed amendment is only a change to the inservice inspection and test program which maintains the same confidence level as the original program, the change is clearly within all acceptable criteria specified in the Standard Review Plan.

ATTACHMENT C

SIGNIFICANT HAZARDS CONSIDERATION

This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

ATTACHMENT D

ENVIRONMENTAL ASSESSMENT STATEMENT APPLICABILITY REVIEW

Commonwealth Edison has evaluated the proposed amendment against the criteria for the identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed change meets the criteria for a categorical exclusion as provided for under 10 CFR 51.22(c)(9). This conclusion has been determined because the proposed changes do not pose a significant hazards consideration or do not involve a significant increase in the amounts, and no significant changes in the types, or effluents that may be released offsite. This request does not involve a significant increase in individual or cumulative occupational radiation exposure. Therefore, the Environmental Assessment Statement is not applicable for these changes.