



# Entergy Operations

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October 15, 1991

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Subject: Arkansas Nuclear One - Unit 1 and 2  
Docket Nos. 50-313 and 368  
License Nos. DPR-51 and NFP-6  
Technical Specifications Change Request  
Regarding the Incorporation of Generic Letter 90-09

Gentlemen:

Attached for your review and approval are proposed changes revising ANO Unit 1 Technical Specification 3.16 and 4.16 and its Bases and ANO Unit 2 Technical Specifications 3/4.7.8 and its Bases. Additionally, a change to the ACTIONS is being made to reformat the required actions and allow continued operation with an inoperable snubber, if an evaluation of the attached system justifies this alternative. The proposed changes are in accordance with the recommended changes in Generic Letter 90-09 "Alternative Requirements for Snubber Inspection Intervals and Corrective Actions" with minor editorial clarifications.

In accordance with 10CFR50.91(a)(1), and using the criteria in 10CFR50.92(c), Entergy Operations has determined that the change involves no significant hazards consideration. The basis for this determination is included in the enclosed submittal. Although the circumstances of this proposed amendment is not exigent or emergency, your prompt review and approval is requested.

We request that the effective date for this change be 30 days after NRC issuance of the amendment to allow for distribution and procedural revisions necessary for implementation. Approval is requested before December 30, 1991 so that ANO can make the procedural revisions required and apply the revised inspection criteria during the upcoming Unit 1 outage currently scheduled to begin in early 1992.

Very truly yours,

*gary j. harte* NSC

NSC:lpj  
Attachments

ADD 1/1

U. S. NRC  
October 15, 1991  
0CAN109105

cc: Mr. Robert Martin  
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STATE OF ARKANSAS )

) SS

COUNTY OF LOGAN )

OATH

I, J. W. Yelverton, being duly sworn, subscribe to and say that I am General Manager, Plant Operations AND for Entergy Operations, that I have full authority to execute this oath; that I have read the document numbered 0CAN109105 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.

J. W. Yelverton  
J. W. Yelverton

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 15th day of October, 1991.

Sandy Suckemore  
Notary Public

My Commission Expires:

May 11, 2000

ENCLOSURE  
PROPOSED TECHNICAL SPECIFICATION  
AND  
RESPECTIVE SAFETY ANALYSES  
IN THE MATTER OF AMENDING  
LICENSE NOS. DPR-51 AND NFP-6  
ENTERGY OPERATIONS, INC.  
ARKANSAS NUCLEAR ONE, UNITS 1 AND 2  
DOCKET NOS. 50-313 AND 50-368

#### PROPOSED CHANGE

The proposed change to the ANO-1 Technical Specifications (TS) revises TS 3.16 and 4.16, Shock Suppressors (Snubbers). The proposed change will replace the existing visual inspection schedule in Surveillance Requirement 4.16.1.b (Visual Inspections) with the snubber visual inspection schedule recommended in NRC Generic Letter 90-09 and will revise Surveillance Requirement 4.16.1.c (Visual Inspection Acceptance Criteria) essentially as recommended in NRC Generic Letter 90-09.

The proposed change to the ANO-2 Technical Specifications (TS) revises TS 3/4.7.8, Shock Suppressors (Snubbers). The proposed change will replace the existing visual inspection schedule in Surveillance Requirement 4.7.8.1.b (Visual Inspections) with the snubber visual inspection schedule recommended in NRC Generic Letter 90-09 and will revise Surveillance Requirement 4.7.8.1.c (Visual Inspection Acceptance Criteria) essentially as recommended in NRC Generic Letter 90-09.

Additionally, a change to the ACTIONS is being made to refer to the required actions and allow continued operation with an inoperable snubber, if an evaluation of the attached component shows this alternative is acceptable.

Other Basis changes as recommended in the Generic Letter and minor editorial changes, including deleting the word "HYDRAULIC" from the title HYDRAULIC SHOCK SUPPRESSORS (SNUBBERS), are included in this request.

#### BACKGROUND

The wording of the Technical Specification sections addressed above currently specify a schedule for snubber visual inspections based on the number of inoperable snubbers found during the previous visual inspection. The schedules for visual inspections assume that refueling intervals will not exceed 18 months. Because the current schedule for snubber visual inspections is based strictly upon the number of inoperable snubbers found during the previous visual inspection, irrespective of the size of the snubber population, licensees having a large number of snubbers find that the visual inspection schedule is excessively restrictive. As the Staff stated in the Generic Letter "Some licensees (with large snubber populations) have spent a significant amount of resources and have subjected plant personnel to unnecessary radiological exposure to comply with the visual inspection requirements."

To alleviate this situation, the NRC Staff developed an alternative schedule for visual inspections that maintains the same confidence level as the existing schedule and generally allows the licensee to perform visual inspections and corrective actions during plant outages. This Technical Specification revision will reduce future occupational radiation exposure and is highly cost effective. The alternate inspection schedule as identified in Enclosure B of Generic Letter 90-09 is consistent with the Commission's Policy Statement on Technical Specification Improvements. Revisions and additions to the wording of Generic Letter 90-09 proposed Technical Specifications were made to maintain consistency with the

current ANO Technical Specification terminology, definition of snubber categorization and disposition of visual failures.

#### DISCUSSION

All snubbers installed on safety related systems or on non safety-related systems where failure of a snubber or the system could adversely impact a safety-related system are to be visually inspected. The inspection schedule is described in the following Technical Specification Surveillance Requirements.

Unit 1 TS 4.16 and Bases

Unit 2 TS 4.7.8 and Bases

The following proposed changes to the above TS Surveillance Requirements are the Generic Letter 90-09 "Alternative Requirements for Snubber Inspection Intervals and Corrective Actions" recommended changes with minor editorial clarifications as described below. The proposed table establishes three limits for determining the next visual inspection interval corresponding to the population or category of snubber. The next visual inspection interval may be twice, the same, or reduced by as much as one-third of the previous inspection interval. This interval depends on the number of unacceptable snubbers found in proportion to the size of the population or category of snubbers included in the previous inspection. For a population that differs from the representative size provided in the Unit's TS table, the values for the limits may be found by interpolation from the limits provided in the tables for determining the next inspection interval. Footnotes to the tables provide further guidance on interpolation and determining inspection intervals.

The proposed change will replace the existing snubber visual inspection schedule with the schedule from Generic Letter 90-09. This change will allow accessible and inaccessible snubbers to be either grouped together for visual inspections or inspected independently and generally increases the snubber visual inspection intervals such that visual inspections may be performed during refueling outages. The changes from the recommended schedule description in Generic Letter 90-09 and other changes not explicitly discussed in GL 90-09 are discussed by TS paragraph title as follows:

#### PLANT SYSTEMS (Unit 2, TS 3/4.7.8)

Delete the word "HYDRAULIC" from the title HYDRAULIC SHOCK SUPPRESSORS (SNUBBERS). The TS applies to mechanical snubbers as well as hydraulic snubbers, therefore the word is deleted to accurately reflect the components addressed by the Specification.

#### LIMITING CONDITION FOR OPERATION

The following additions and changes are being made to the Specification or ACTION of the appropriate Technical Specifications. The additions are consistent with Generic Letter 90-09. Generic Letter 90-09 includes provisions for review and evaluation which may justify continued operation with an inoperable snubber. This provision is discussed in Enclosure A



and is included in the Visual Inspection Acceptance Criteria section of Enclosure B. These additions are to maintain consistency of intent and wording within the Specification or ACTION, and the Visual Inspection Acceptance Criteria sections of the Technical Specifications. This change clarifies the potential use of a documented analysis to justify continued plant operation with an inoperable snubber as allowed in the Generic Letter, and how the review and evaluation relates to the Specification or ACTION paragraphs. This change is also addressed in the Visual Inspection Acceptance Criteria and Bases sections discussions.

#### ACTION

Unit 1, Specification 3.16.1

Unit 2, ACTION 3.7.8

The proposed change to the ACTION provides the option of continued operation with an inoperable snubber, if an evaluation of the attached system shows this alternative is acceptable. This evaluation is performed to ensure the system design criteria is met and that safety requirements are not changed. The evaluation is based on approved analysis methods and acceptance criteria. This change was not addressed specifically in Generic Letter 90-09, however, it was addressed in the visual inspection acceptance criteria section of Generic Letter 90-09, and is consistent with the guidance provided in the Generic Letter. Incorporation of the review and evaluation to justify continued operation with an inoperable snubber into the Visual Acceptance Criteria Section would cause conflict with the ACTION as currently written.

The current ACTION statements are:

Unit 1-"If any applicable shock suppressor is determined to be inoperable during power operation, that shock suppressor shall be made operable or replaced within 72 hours or the reactor shall be placed in cold shutdown condition within an additional 36 hours."

Unit 2-"With one or more applicable snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.8.f on the attached component, or declare the attached system inoperable and follow the appropriate ACTION statement for that system."

This proposed change clarifies the main ACTION statement in the SHOCK SUPPRESSOR Technical Specifications for review and evaluation of snubbers by allowing for a determination that a system be OPERABLE with a snubber INOPERABLE. Continued plant operation with an INOPERABLE snubber would be justified only if the evaluation is based on approved analysis methods and acceptance criteria with a result that safety requirements are not changed.

the ACTIONS have been revised as follows:

"With one or more applicable snubbers inoperable, within 72 hours either:

- a. Replace or restore the inoperable snubber(s) to an OPERABLE status and perform an engineering evaluation of the attached component per Specification 4.16.1.f (4.7.8.f) or,
- b. Perform a review and evaluation which justifies continued operation with the inoperable snubber(s) and perform an engineering evaluation of the attached component(s) per Specification 4.16.1.f (4.7.8.f) or,
- c. Declare the attached system inoperable and follow the appropriate ACTION statement for that system."

#### Visual Inspections

Unit 1, TS 4.16.1.b

Unit 2, TS 4.7.8.b

Replace "are" with "may be" in the first sentence and replace "type" with "category" in the third sentence of the Generic Letter wording for Visual Inspections. These changes are to maintain consistency of intent and wording used within the Generic Letter and terminology used at ANO.

Do not include the following portion of the last sentence of Generic Letter 90-09 for Visual Inspections" "...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 (\*)."

ANO's current surveillance program establishes 18-month plus or minus 25 percent intervals based on snubber type groupings. ANO currently has the following type groups and interval schedules:

<u>Type Group</u>	<u>Unit 1</u>		<u>Unit 2</u>	
	<u>Accessible</u>	<u>Inaccessible</u>	<u>Accessible</u>	<u>Inaccessible</u>
PSA-1, 3, 10	18	18	12	18
PSA-35, 100	18	18	18	18
AD-40, 70, 150, 500	18	18	18	18
AD-1600, 5500, 12500	N/A	18	18	18
Grinnell SB Hydraulic	18	18	N/A	N/A
Paul Munroe SB Hydraulic	N/A	18	N/A	18
Paul Munroe LB Hydraulic	N/A	18	N/A	12



The visual inspection schedule established in Generic Letter 90-09 is based on a grouping of a unit's whole snubber population or two category groupings consisting of accessible and inaccessible snubbers. Therefore, the current ANO type groupings will be reestablished into population or category groupings in accordance with the proposed TS and Generic Letter 90-09. The interval schedule consistent with population or category groupings would be established starting with the first refueling outage after NRC approval of the proposed changes. For consistency of interpretation and clarity, Note 7 has been added to the proposed tables TS 4.16-1 (Unit 1) and TS 4.7.8-1 (Unit 2) defining "interval" as it applies to visual inspection of snubbers.

#### Justification

As noted in the table above, ANO-2 is in a 12 month plus or minus 25 percent interval for accessible and inaccessible snubbers based on inspections completed April 12, 1991. This allows for inspection from January 12, 1992 to July 12, 1992. The current 12 month inspection interval is based on 1 snubber failure in each of two type groups, which were in two different categories. If the proposed visual inspection interval table from Generic Letter 90-09 had been used during the last inspection to establish the next interval, both categories would have been able to wait until the respective refueling outage for that unit to perform the next visual inspection. Based on this, the proposed implementation schedule stated above is consistent with Generic Letter 90-09 intent.

#### Visual Inspection Acceptance Criteria

##### Unit 1, TS 4.16.1.c

##### Unit 2, TS 4.7.8.c

Three changes to ANO-1 TS 4.16.1.c and ANO-2 TS 4.7.8.c Visual Inspection Acceptance Criteria, are requested based on the recommended changes in Generic Letter 90-09, with slight deviations. They are as follows:

1. Clarify that snubbers which appear INOPERABLE as a result of visual inspections shall be classified as INOPERABLE before permitting them to be reclassified as OPERABLE for establishing the next visual inspection interval.

The words "INOPERABLE and OPERABLE" are used in place of "UNACCEPTABLE and ACCEPTABLE" respectively to maintain consistency of terminology within the ANO TS.

2. Do not include the following statement from Generic Letter 90-09, "All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next inspection interval." ANO's existing TS requirement is more appropriate to ANO's Units and reads as follows: "However, when the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined operable via functional testing for the purpose of establishing the next visual inspection interval. All snubbers connected to a common reservoir shall be evaluated for operability if any snubber connected

to that reservoir is determined to be inoperable." ANO-1 will implement the final upgrades to it's small bore hydraulic snubber population during the next refueling outage, 1R10. The upgraded snubbers have individual reservoirs, eliminating any common reservoirs. The large bore hydraulic snubbers installed on ANO-1 Reactor Coolant Pumps (RCP), 8 total (2 per RCP), utilize common reservoirs. The RCP Snubbers are of an equal area displacement design with double ended piston rods, therefore the reservoir fluids are not required to maintain snubber operability when the snubber is stroked. Individual evaluations of snubber operability would be performed in the event an empty or inoperable snubber or reservoir was found.

Unit 2's small bore hydraulic snubber population (5) have no common reservoirs. The 8 large bore hydraulic snubbers installed on Unit 2's RCP's are of the same design as Unit 1's RCP snubbers discussed above. Unit 2 also has 8 total large bore snubbers installed on the SG's (4 per SG). These snubbers are a single rod design and require makeup fluid from the reservoir during plant heatup when all the snubbers stroke out approximately 6". A single snubber seal failure or a common reservoir failure would not make the remainder of these snubbers inoperable, and therefore counting these snubbers as inoperable as recommended in Generic Letter 90-09 would be overly penalizing.

## Snubber Visual Inspection Interval

Unit 1, TS Table 4.16-1

Unit 2, TS Table 4.7.8-1

The word INOPERABLE is used in place of "UNACCEPTABLE" throughout the table(s) to maintain consistency of terminology within the ANO Technical Specifications.

Note 6 of the table was changed to read "Specified surveillance intervals may be adjusted plus or minus 25 percent to accommodate normal test and surveillance schedule intervals up to and including 48 months, with the exception that inspection of inaccessible snubbers may be deferred to the next shutdown when plant conditions allow five days for inspections. See Note 7 for definition of interval as applied to snubber visual inspections." This clarifies the tolerance requirements for performance of the surveillance specifically for snubbers. The plus or minus 25 percent tolerances are addressed in the current TS inspection schedules for both units, and the Surveillance Requirements Bases for Shock Suppressors. In addition, the alternatives presented in Generic Letter 90-09 are intended to generally allow visual inspections and corrective actions to be performed during plant refueling outages, therefore the suggested changes are in keeping with the intent of Generic Letter 90-09 while reducing occupational exposure and resource expenditures. Additionally the following sentences are relocated from the existing Technical Specifications to Note 6 for the respective Technical Specifications:

For ANO-1: "The provisions of Specification 4 regarding surveillance intervals are not applicable."

For ANO-2: "The provisions of Specification 4.0.2 are not applicable."

Add "Note 7: Interval as defined for the shock suppressors (snubbers) visual inspection surveillance requirement is the period of time starting when the unit goes into cold shutdown for refueling, and ending when the unit goes into cold shutdown for its next scheduled refueling. This period of time is nominally considered to be an 18 month period, or a 24 month period based on the type of fuel being used. However, the period of time (interval) could be shorter or longer due to plant operating variables such as fuel life and operating performance." An interval is not a fixed period, but rather a period of time based on a refueling event. This required some definition in the event there was a sufficient number of unacceptable snubbers that would require use of the "Reduced Interval" Column C of the proposed Table. In that event, the nominal values for the anticipated operational cycle, based on the type of fuel in use, would be used for determining the interval duration. As an example, a plant utilizing 18 month fuel with a snubber population of 400, with the number of unacceptable snubbers equaling 25, interpolation would be required using a fixed value as the bases for the interval duration. In this example, that would be 18 months. Generic Letter 90-09 states, "The alternative inspection interval is based on a fuel cycle of up to 24 months and may be as long as two fuel cycles, or 48 months for plants with other fuel cycles, depending on the number of unacceptable snubbers found

during the previous visual inspection." The current TS for functional tests is also tied to refueling outage schedules, therefore the addition of Note 7 is only for clarification and definition of the word "Interval", and is consistent with other sections of the SHOCK SUPPRESSOR TS's and Generic Letter 90-09.

#### Bases Changes

The proposed change will revise Technical Specification 4.16 SHOCK SUPPRESSOR (Snubbers) Bases (Unit 1) and TS 3/4.7.8 SHOCK SUPPRESSORS (Snubbers) Bases (Unit 2) to be consistent with the Technical Specification changes.

1. Revise the second sentence in the second paragraph to "...varies based upon the number of INOPERABLE snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories and the previous inspection interval" as specified in NRC Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions." This change clarifies the intent of this Technical Specification to take credit for the size of the population or categories and does not significantly reduce the snubber operability confidence levels.
2. Add the following sentence:  
  
"If a review and evaluation of an INOPERABLE snubber is performed and documented to justify continued operation, and provided that all design criteria are met with the INOPERABLE snubber, then the INOPERABLE snubber would not need to be restored or replaced.
3. Delete the following sentence:  
  
"Since plant startup should not commence with knowingly defective safety related equipment, Specification 3.16.1 prohibits startup with inoperable shock suppressor". The current provision of ANO Unit 1 Technical Specification 3.0.4 prohibits entry into an operating condition unless the conditions of the limiting condition for operation are met without reliance on provisions contained in the ACTION statements, therefore, it is not necessary to place restrictions for plant startup in this specification.

In Generic Letter 90-09 the NRC recommended all the significant changes proposed by ANO. The differences or editorial changes proposed are for clarity to maintain consistency of terminology and to assure operability confidence level for the installed shock suppressors.

The proposed TS change base the visual inspection interval on the snubber population, previous inspection results, and the length of the previous inspection interval. The proposed changes will generally extend the snubber visual inspection intervals so that snubber visual inspections and corrective actions may be performed during refueling outages. Taking credit for the snubber population of each unit, the combination of functional testing with visual inspections will continue to provide a 95 percent confidence level that 90 percent to 100 percent of the snubbers will operate within the specified acceptance limits. This confidence level (reliability) is equivalent to that provided by the existing snubber inspection and functional testing requirements. There is no change in the plant equipment, operation, or accident analysis assumptions. Therefore, there is no negative safety impact from this change. In addition, this new schedule will reduce future occupational radiation exposure, is highly cost effective, and allows resources to be better utilized. From this standpoint, implementation of this change represents an enhancement to plant operations.

The existing TS's require the visual inspection schedule for snubbers on safety related (and associated) systems to be based on the number of INOPERABLE snubbers found within a type group during the previous inspection, and the length of the previous inspection interval. The existing snubber visual inspection schedule considers only the absolute number of snubber failures within a type group, and does not consider the size of the snubber populations. The proposed snubber visual inspection schedule is based on the number of INOPERABLE snubbers found during the previous inspection in proportion to the size of unit populations or categories.

Based on the existing TS schedules, the maximum visual inspection interval between surveillances is normally 18 months plus or minus 25%. Using the recommended Generic Letter Table, "Snubber Visual Inspection Interval," the snubber visual inspection intervals will generally be increased so that snubber visual inspections may be performed during refueling outages. The proposed visual inspection schedule specifies the number of INOPERABLE snubbers which may be found during an inspection interval for various snubber populations to determine the length of the next visual inspection interval. Based on the proposed schedule, the snubber population, and the number of INOPERABLE snubbers for the corresponding unit snubber population, a visual inspection interval may be twice, remain the same as, or be reduced to two-thirds the previous inspection interval. For example, a previous visual inspection interval of 18 months will remain 18 months if the snubber population is 400 and the number of INOPERABLE snubbers is greater than 8 but not greater than 18. The population in the example is equivalent to Unit 2's snubber population. The maximum interval will not exceed two cycles or 48 months for plants with 24 month fuel. The proposed Visual Inspection Interval may be adjusted plus or minus 25 percent to accommodate normal test and surveillance schedule intervals with the exception that inspection of inaccessible snubbers may be deferred to the next shutdown when plant conditions allow five days for inspection. This is in keeping with the intent of Generic Letter 90-09 to do inspections of snubbers during scheduled outages.



Also, in accordance with Generic Letter 90-09, the proposed TS change allows snubbers to be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be inspected separately or jointly. ANO will make and document the decision to categorize snubbers as accessible or inaccessible before an inspection and shall use that decision and the results of the visual inspection to determine the next inspection interval.

#### DETERMINATION OF SIGNIFICANT HAZARDS

An evaluation of the proposed change has been performed in accordance with 10CFR50.91(a)(1) regarding no significant hazards consideration using the standards in 10CFR50.92(c). A discussion of those standards as they relate to this amendment request follows:

Criterion 1 - Does Not Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated.

Snubbers are installed to maintain the structural integrity of systems and components which either mitigate the consequences of an accident or failure of which may initiate a previously analyzed accident. No physical change to the facility or its operating parameters is being made. The proposed changes were developed by the NRC Staff and maintain the same confidence level as the existing visual snubber inspection schedule as specified within the Generic Letter 90-09. For these reasons, the response of the plant to previously evaluated accidents will remain unchanged. Therefore, this change does not involve an increase in the probability or consequences of an accident previously evaluated.

Criterion 2 - Does Not Create the Possibility of a New or Different Kind of Accident from any Previously Evaluated.

The proposed Technical Specification change does not change the number, type, design, function, or service life of snubbers in either Unit 1 or 2. The proposed change does not alter the configuration of the facility, plant operation, or accident analysis assumptions. Since no change is being made to degrade the design, operation, or maintenance of the plant, a new mode of failure is not created. The increase in the length of snubber visual inspection intervals and clarification of existing visual inspection acceptance criteria have no effect on accidents. Changes to the visual inspection criteria which deviate from GL 89-09 are clarifications only and do not change the intended meaning of the criteria. The proposed TS change will maintain the snubber operability confidence level within acceptable limits. Therefore, a new or different kind of accident will not occur as a result of these changes.



Criterion 3 - Does Not Involve a Significant Reduction in the Margin of Safety.

The Surveillance Requirements set forth in Generic Letter 90-09 as alternate requirements for snubber visual inspection intervals were developed by the NRC Staff and, as addressed in Generic Letter 90-09 (including ANO's revisions), maintain the same confidence level as the present requirements. Therefore, incorporating the suggested Surveillance Requirements from Generic Letter 90-09 will not reduce any margin of safety.

CONCLUSION:

The Commission has provided guidance in 51 FR 7750 dated March 6, 1986 concerning the application of the standards for determining whether a significant hazards consideration exists. The proposed amendment most closely matches example: (vii)

"A change to conform a license to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations."

Based on the above evaluation it is concluded that the proposed Technical Specification change does not constitute a significant hazards concern.