

ATTACHMENT 2

REQUEST FOR LICENSE AMENDMENT
SNUBBER VISUAL INSPECTION INTERVALS
FACILITY OPERATING LICENSE NPF-57
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

TECHNICAL SPECIFICATION PAGES WITH PEN AND INK CHANGES

The following Technical Specifications for Facility Operating License No. NPF-57 are effected by this license amendment request:

<u>Technical Specification</u>	<u>Page</u>
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TABLE 4.7.5-1	NEW
BASIS 3/4.7.5	B 3/4 7-2

PLANT SYSTEMS

3/4.7.5 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.5 All 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, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.5.g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.5 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

categories

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 snubbers. If all snubbers of each type are found OPERABLE during the first inservice visual inspection, the second inservice visual inspection shall be performed at the first refueling outage. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

Delete the blocked-out portion and replace with insert from attached

INSERT FOR SPECIFICATION 4.7.5.b, PAGE 3/4 7-13:

...determined by Table 4.7.5-1. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7.5-1 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 [insert amendment number].

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

No. Inoperable Snubbers of Each Type 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 Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are secure. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection period, providing 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; or (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specifications 4.7.4.f. For those snubbers common to more than one system, the OPERABILITY of such snubbers shall be considered in assessing the surveillance schedule.

d. Transient Event Inspection

An inspection shall be performed of all snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients, as determined from a review of operational data or a visual inspection of the systems, within 72 hours for accessible systems and 6 months for inaccessible systems following this determination. 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.

*The inspection interval for each type of snubber 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.

#The provisions of Specification 4.0.2 are not applicable.

INSERT A FOR SPECIFICATION 4.7.5.c, PAGE 3/4 7-14:

...shall be classified as unacceptable and may be reclassified acceptable...

INSERT B FOR SPECIFICATION 4.7.5.c, PAGE 3/4 7-14:

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.

NEW TABLE TO BE INSERTED AS PAGES 3/4 7-17a AND 3/4 7-17b:

TABLE 4.7.5-1
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 unaccessible. These categories may be examined separately or jointly. However, that decision shall be made and documented before any inspection and shall serve as the basis upon which the next inspection interval for that category is determined.

(Continued)

TABLE 4.7.5-1 (Continued)
SNUBBER VISUAL INSPECTION INTERVAL

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.

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:

$$I_1 = I_0 - I_0 \cdot \frac{1}{3} \cdot \frac{U - B}{C - B}$$

where:

I_1 = next inspection interval

I_0 = previous inspection interval

U = number of unacceptable snubbers found during the previous inspection interval

B = number in Column B

C = number in Column C

Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

PLANT SYSTEMS

BASES

REACTOR CORE ISOLATION COOLING SYSTEM (Continued)

The surveillance requirements provide adequate assurance that RCIC will be OPERABLE when required. Although all active components are testable and full flow can be demonstrated by recirculation during reactor operation, a complete functional test requires reactor shutdown. The pump discharge piping is maintained full to prevent water hammer damage and to start cooling at the earliest possible moment.

3/4.7.5 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety related system.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2-kip, 10-kip, and 100-kip capacity manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" for the purposes of this Technical Specification would be of a different type, as would hydraulic snubbers from either manufacturer.

A list of individual snubbers with detailed information of snubber 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 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 snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

Replace lined-out sentence with intent from attached

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 and is determined by the number of inoperable snubbers found during an inspection. 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

INSERT FOR BASIS 3/4.7.5, PAGE B 3/4 7-2:

Therefore, the required inspection interval is based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories. This inspection schedule is based on the guidance provided in Generic Letter 90-09.