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Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

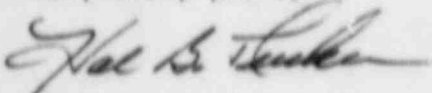
Attention: Ms. E. G. Adensam, Chief
Licensing Branch No. 4

Re: Catawba Nuclear Station, Unit 1
Docket No. 50-413
Draft Technical Specifications

Dear Mr. Denton:

This letter transmits our proposed revision to Draft Technical Specification 3/4.7.8 -- SNUBBERS. The justification for the revision was discussed between Mr. Fred Anderson of your staff and representatives of Duke.

Very truly yours,



Hal B. Tucker

RWO/rhs

Attachment

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PLANT SYSTEMS

3/4.7.8 SNUBBERS

The only snubbers excluded from this requirement are those installed on non-safety-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.

LIMITING CONDITION FOR OPERATION

Hydraulic and mechanical
3.7.8 All ~~snubbers listed in Tables 3.7-4a and 3.7-4b~~ shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on 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 per Specification 4.7.8g. on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.8 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program ^{in lieu of} 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 and may be treated independently. ~~The accessibility of each snubber shall be determined and approved by the Station Health Physicist or qualified designee prior to performing each visual inspection. The determination shall be based upon the then existing radiation levels in each snubber location and the expected time to perform the visual inspection and shall be in accordance with the recommendations of Regulatory Guides 8.8 and 8.10.~~

Hydraulic and mechanical
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. ~~listed in Tables 3.7-4a and 3.7-4b~~ If less than two snubbers of each type are found inoperable during the first inservice 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:

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SURVEILLANCE REQUIREMENTS (Continued)

No. Inoperable Snubbers of Each Type Found During Inspection	Time Until Subsequent Visual Inspection*#
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. Refueling Outage Inspections

At each refueling, the systems which have the potential for a severe dynamic event, specifically, the main steam system (upstream of the main steam isolation valves) the main steam safety and power-operated relief valves and piping, auxiliary feedwater system, main steam supply to the auxiliary feedwater pump turbine, and the letdown and charging portion of the CVCS system shall be inspected to determine if there has been a severe dynamic event. In case of a severe dynamic event, mechanical snubbers in that system which experienced the event shall be inspected during the refueling outage to assure that the mechanical snubbers have freedom of movement and are not frozen up. The inspection shall consist of verifying freedom-of-motion using one of the following: (1) manually induced snubber movement; (2) evaluation of in-place snubber piston setting; (3) stroking the mechanical snubber through its full range of travel. If one or more mechanical snubbers are found to be frozen up during this inspection, those snubbers shall be replaced or repaired before returning to power. The requirements of Specification 4.7.8b. are independent of the requirements of this specification.

d. Visual Inspection Acceptance Criteria

Visual inspections shall verify: ^{that} (1) ~~that~~ there are no visible indications of damage or impaired OPERABILITY, and (2) attachments to the foundation or supporting structure are ~~secure~~ ^{functional, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are functional.} 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) ~~(irrespective of type)~~ that may be generically susceptible; ^{regardless}

* 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.

The large-bore steam generator hydraulic snubbers shall be treated as a separate population for functional test purposes. A 10% random sample shall be tested at least once per refueling outage with continued testing based on a failure evaluation.

SURVEILLANCE REQUIREMENTS (Continued)

d. Visual Inspection Acceptance Criteria (Continued)

and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specification 4.7.8f. When 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 ^{may} unless the test is started with the piston in the as-found setting, extending the piston rod in the tension mode direction. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

e. Functional Tests ^{only if} during SHUTDOWN

During the first refueling shutdown and at least once per ^{18 months} ~~refueling~~ thereafter, 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 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 snubbers required by Specification 3.7.8 shall be functionally tested either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria of Specification 4.7.8f., an additional 10% of the snubbers shall be functionally tested until no more failures are found or until all snubbers have been functionally tested; or
- 2) A representative sample of the snubbers required by Specification 3.7.8 shall be functionally tested in accordance with Figure 4.7-1. "C" is the total number of snubbers found not meeting the acceptance requirements of Specification 4.7.8f. The cumulative number of snubbers tested is denoted by "N." At the end of each day's testing, the new values of "N" and "C" (previous day's total plus current day's increments) shall be plotted on Figure 4.7-1. If at any time the point plotted falls in the "Reject" region all snubbers shall be functionally tested. If at any time the point plotted falls in the "Accept" region, testing of snubbers may be terminated. When the point plotted lies in the "Continue Testing" region, additional snubbers shall be tested until the point falls in the "Accept" region or the "Reject" region, or all the snubbers required by Specification 3.7.8 have been tested. Testing equipment failure during functional testing may invalidate that day's testing and allow that day's testing to resume anew at a later time, providing all snubbers tested with the failed equipment during the day of equipment failure are retested; or
- 3) An initial representative sample of fifty-five (55) snubbers shall be functionally tested. For each snubber which does not meet the functional test acceptance criteria, another sample of

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SURVEILLANCE REQUIREMENTS (Continued)

e. Functional Tests (Continued)

at least one-half the size of the initial sample shall be tested until the total number tested is equal to the initial sample size multiplied by the factor, $1 + C/2$, where "C" is the number of snubbers found which do not meet the functional test acceptance criteria. This plan can be plotted using an "Accept" line which follows the equation $N = 55(1 + C/2)$. Each snubber should be plotted as soon as it is tested. If the point plotted falls on or below the "Accept" line, testing may be discontinued. If the point plotted falls above the "Accept" line, testing must continue unless all snubbers have been tested.

The representative sample^{selected} for the functional test sample plans shall be randomly selected from the snubbers required by Specification 3.7.8 and reviewed before beginning the testing. The review shall ensure as far as practical that they are representative of the various configurations, operating environments, range of sizes, and capacities. Snubbers placed in the same locations as snubbers which failed the previous functional test shall be retested at the time of the next functional test but shall not be included in the sample plan. If during the functional testing, additional sampling is required due to failure of only one type of snubber, the functional testing results shall be reviewed at that time to determine if additional samples should be limited to the type of snubber which has failed the functional testing.

f. 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 rate where required, is present in both tension and compression, within the specified range;
- 3) Where required, the force required to initiate or maintain motion of the snubber is within the specified range in both direction of travel; and
- 4) For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement.

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.

g. Functional Test Failure Analysis

An engineering evaluation shall be made of each failure to meet the functional test acceptance criteria to determine the cause of the

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

g. Functional Test Failure Analysis (Continued)

failure. The results of this evaluation shall be used, if applicable, in selecting snubbers to be tested in an effort to determine the OPERABILITY of other snubbers irrespective of type which may be subject to the same failure mode.

For the snubbers found inoperable, an engineering evaluation shall be performed on the components to which the inoperable snubbers are attached. The purpose of this engineering evaluation shall be to determine if the components to which the inoperable snubbers are attached were adversely affected by the inoperability of the snubbers in order to ensure that the component remains capable of meeting the designed service.

If any snubber selected for functional testing either fails to activate or fails to move, i.e., frozen-in-place, the cause will be evaluated and, if caused by manufacturer or design deficiency, all snubbers of the same type subject to the same defect shall be evaluated in a manner to ensure their OPERABILITY. This testing requirement shall be independent of the requirements stated in Specification 4.7.8e. for snubbers not meeting the functional test acceptance criteria.

h. Functional Testing of Repaired and Replaced Snubbers

Snubbers which fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers which have repairs which might affect the functional test result shall be tested to meet the functional test criteria before installation in the unit. Mechanical snubbers shall have met the acceptance criteria subsequent to their most recent service, and freedom-of-motion test must have been performed within 12 months before being installed in the unit.

i. Service Life Snubber Seal Replacement Program

~~The seal service life of hydraulic snubbers shall be monitored to ensure that the service life is not exceeded between surveillance inspections. The expected service life for the various seals, seal materials, and applications shall be determined and established based on engineering information and the seals shall be replaced so that the expected service life will not be exceeded during a period when the snubber is required to be OPERABLE. The seal replacements shall be documented and the documentation shall be retained in accordance with Specification 6.10.2.~~

The service performance of all snubbers shall be monitored. If a service life time limit is associated (established) with any snubber (or critical parts) based on manufacturer's information, qualification tests, or historical service results, then the service life of the affected snubbers shall be monitored to ensure that service life is not exceeded between surveillance inspections. Established snubber service life shall be extended or shortened based on monitored test results or failure history. All documentation shall be retained in accordance with Specification 6.10.2.

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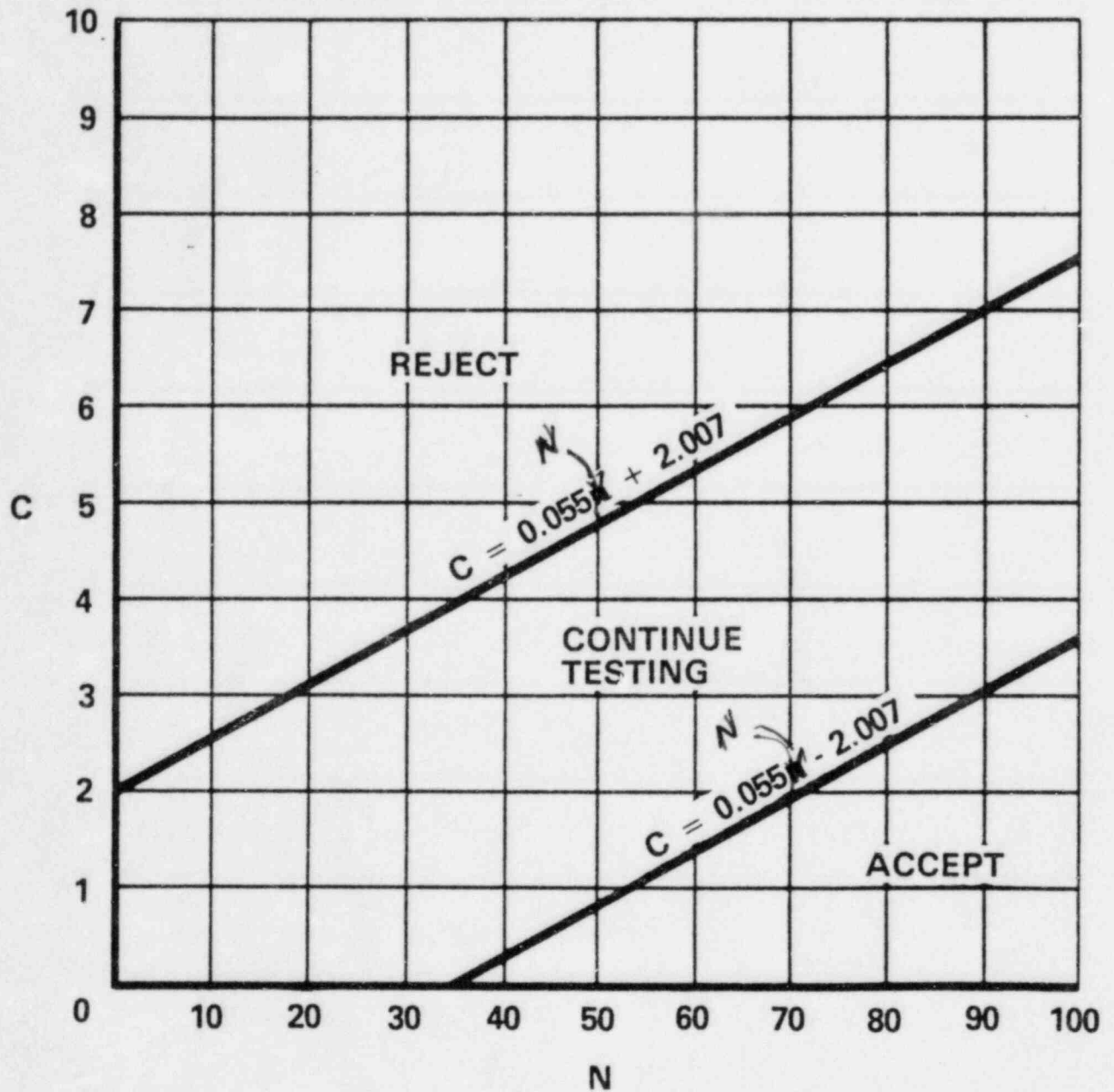


FIGURE 4.7-1
SAMPLE PLAN 2) FOR SNUBBER FUNCTIONAL TEST

BASES3/4.7.7 AUXILIARY BUILDING FILTERED VENTILATION EXHAUST SYSTEM

The OPERABILITY of the Auxiliary Building Filtered Ventilation Exhaust System ensures that radioactive materials leaking from the ECCS equipment within the auxiliary building following a LOCA are filtered prior to reaching the environment. Operation of the system with the heaters operating to maintain low humidity using automatic control for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The operation of this system and the resultant effect on offsite dosage calculations was assumed in the safety analyses. ANSI N510-1980 will be used as a procedural guide for surveillance testing.

3/4.7.8 SNUBBERS

All ^{provided} 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 Catawba Safety Review Group. 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 Guides 8.8 and 8.10. The addition or deletions of any hydraulic or mechanical snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

BASESSNUBBERS (Continued)

The visual inspection frequency is based upon maintaining a constant level of snubber protection ~~to each safety-related system~~ during an earthquake or severe transient. 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 are constant with time and that the failure of any snubber ~~on that system~~ could cause the ^{unit} ~~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 are used with the 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.

Figure 4.7-1 was developed using "Wald's Sequential Probability Ratio Plan" as described in "Quality Control and Industrial Statistics" by Acheson J. Duncan.

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life ~~destructive~~ testing was performed to qualify the snubber for the applicable design conditions, ~~at either the completion of their fabrication or at a subsequent date~~. Snubbers so exempted shall be listed in the list of individual snubbers indicating the extent of the exemptions.

BASES

SNUBBERS (Continued)

The service life of a snubber is established via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubbers, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life.

3/4.7.9 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(a)(3) 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.

3/4.7.10 FIRE SUPPRESSION SYSTEMS

The OPERABILITY of the Fire Suppression Systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety-related equipment is located. The Fire Suppression System consists of the water system, spray, and/or sprinklers, CO₂, and fire hose stations. The collective capability of the Fire Suppression Systems is adequate to minimize potential damage to safety-related equipment and is a major element in the facility Fire Protection Program.

In the event that portions of the Fire Suppression Systems are inoperable, alternate backup fire-fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service. When the inoperable fire-fighting equipment is intended for use as a backup means of fire suppression, a longer period of time is allowed to provide an alternate means of fire fighting than if the inoperable equipment is the primary means of fire suppression.