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2.0 LIMITING CONDITIONS FOR OPERATION

2.17 MISCELLANEOUS RADIOACTIVE MATERIAL SOURCES

Applicability

Applies to byproduct, source, and special nuclear radioactive material sources.

Objective

To assure that leakage from byproduct, source, and special nuclear radioactive material sources does not exceed allowable limits.

Specifications

Radioactive sources shall be leak tested for contamination. The leakage test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. If the test reveals the presence of 0.005 microcurie or more of removable contamination, it shall immediately be withdrawn from use, decontaminated, and repaired, or be disposed of in accordance with Commission regulations. Those quantities of byproduct material that exceed the quantities listed in 10 CFR Part 30, Section 30.71, Schedule B are to be leak tested in accordance with the schedule shown in Surveillance Requirements. All other sources (including alpha emitters) containing greater than 0.1 microcurie are also to be leak tested in accordance with the Surveillance Requirements.

Basis

Ingestion or inhalation of source material may give rise to total body or organ irradiation. This specification assures that leakage from radioactive material sources does not exceed allowable limits. In the unlikely event that those quantities of radioactive byproduct materials of interest to this specification which are exempt from leakage testing are ingested or inhaled, they represent less than one maximum permissible body burden for total body irradiation. The limits for all other sources (including alpha emitters) are based upon 10 CFR Part 70, Section 70.39(c) limits for plutonium.

2.0 LIMITING CONDITIONS FOR OPERATION

2.18 Shock Suppressors (Snubbers)

Applicability

Operating Modes 1, 2 and 3 (Operating Modes 4 and 5 for snubbers located on systems required operable in those Operating Modes).

Specifications

- (1) All snubbers required to protect the reactor coolant and other safety related systems shall be operable except as noted in 2.18(2) through 2.18(4) below. These snubbers shall be identified as safety-related snubbers.
- (2) With one or more safety-related snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to operable status and perform an engineering evaluation per Specification 3.14(3) on the supported component or declare the supported system inoperable and follow the appropriate actions specified in the Technical Specifications for that system.
- (3) A safety-related snubber may be removed for surveillance in accordance with Section 3.14(3) of these Technical Specifications, provided the following conditions are met:
 - (a) A given snubber station shall not be without an operable snubber for more than two hours during surveillance of attendant snubber. A snubber may be replaced by an operable snubber during surveillance and repair.
 - (b) No other snubber station is known to be inoperable.
 - (c) Only one snubber station shall be removed for testing at a time to ensure that no two snubber stations are without an operable snubber during the same time interval.
- (4) Safety-related snubbers may be added, changed, or deleted provided an engineering analysis justifies each change.

2.0 **LIMITING CONDITIONS FOR OPERATION**

2.18 **Shock Suppressors (Snubbers)**

Basis

Snubbers are designed to prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, while allowing normal thermal motion during startup or shutdown. The consequence of an inoperable snubber is an increase in the probability of structural damage to piping as a result of a seismic, or other event, initiating dynamic loads. It is therefore required that all snubbers required to protect the primary coolant system or any other safety system or component be operable during reactor operation.

Because the snubber protection is required only during low probability events, an inoperable period of 72 hours is allowed for repairs or replacements and an inoperable period of two hours is allowed for surveillance.

3.0 SURVEILLANCE REQUIREMENTS

3.3 Reactor Coolant System and Other Components Subject to ASME XI Boiler & Pressure Vessel Code Inspection and Testing Surveillance

Applicability

Applies to in-service surveillance of primary system components and other components subject to inspection and testing according to ASME XI Boiler & Pressure Vessel Code.

Objective

To ensure the integrity of the reactor coolant system and other components subject to inspection and testing according to ASME XI Boiler & Pressure Vessel Code.

Specifications

- (1) Surveillance of the ASME Code Class 1, 2 and 3 systems, except the steam generator tubes inspection, should be covered by ASME XI Boiler & Pressure Vessel Code.
 - a. In-service inspection of ASME Code Class 1, Class 2, and Class 3 components, including applicable supports, and in-service testing of ASME Code Class 1, Class 2, and Class 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a (g)(6)(i).
 - b. Surveillance of the reactor coolant pump flywheels shall be performed as indicated in Table 3-6.
 - c. A surveillance program to monitor radiation-induced changes in the mechanical and impact properties of the reactor vessel materials shall be maintained in accordance with 10 CFR Part 50 Appendix H.⁽¹⁾
- (2) Surveillance of Reactor Coolant System Pressure Isolation Valves
 - a. Periodic leakage testing* on each valve listed in Table 2-9 shall be accomplished prior to entering the power operation mode every time the plant is placed in the cold shutdown

* To satisfy ALARA requirements, leakage may be measured indirectly (as from the performance of pressure indicators) if accomplished in accordance with approved procedures and supported by computations showing that the method is capable of demonstrating valve compliance with the leakage criteria.

3.0 SURVEILLANCE REQUIREMENTS

3.13 RADIOACTIVE MATERIAL SOURCES SURVEILLANCE

Applicability

Applies to leakage testing of byproduct, source, and special nuclear radioactive material sources.

Objective

To assure that leakage from byproduct, source, and special nuclear radioactive material sources does not exceed allowable limits.

Specification

Tests for leakage and/or contamination shall be performed by the licensee or by other persons specifically authorized by the NRC or an agreement State, as follows:

1. Each sealed source, except startup sources subject to core flux, containing radioactive material, other than Hydrogen 3, with a half-life greater than thirty days and in any form other than gas shall be tested for leakage and/or contamination at intervals of six months.
2. The periodic leak test required does not apply to sealed sources that are stored and not being used. The sources excepted from this test shall be tested for leakage prior to any use or transfer to another user unless they have been leak tested within six months prior to the date of use or transfer. In the absence of a certificate from a transferor indicating that a test has been made within six months prior to the transfer, sealed sources shall not be put into use until tested.
3. Startup sources shall be leak tested prior to and following any repair or maintenance and before being subjected to core flux.

~~3.0 SURVEILLANCE REQUIREMENTS~~

~~3.14 Shock Suppressors (Snubbers)~~

~~Applicability~~

~~This specification applies to all safety-related snubbers.~~

~~Specifications~~

- ~~(1) All hydraulic snubbers shall be visually inspected. As used in this specification, "type of snubber" shall mean snubbers of the same design and manufacturer, irrespective of capacity. This inspection shall include, but not necessarily be limited to, inspection of the hydraulic fluid reservoir, fluid connections, and linkage connections to the piping and anchor to verify snubber operability. In those locations where snubber movement can be manually induced without disconnecting the snubber, verify that the snubber has freedom of movement and is not frozen up. 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 functional testing acceptance criteria. 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. Visual inspections shall be performed in accordance with Table 3-14.~~
- ~~(2) On a refueling frequency and subject to the conditions below:~~
 - ~~(a) A representative sample (88) of hydraulic snubbers shall be functionally tested either in-place or in a bench test.~~

3.0 SURVEILLANCE REQUIREMENTS
3.14 Shock Suppressors (Snubbers) (Continued)

- (i) For each hydraulic snubber above 3 which does not meet the functional test acceptance criteria, an additional sample of 22 hydraulic snubbers shall be functionally tested.
- (ii) For each inoperable hydraulic snubber found during a resample test, an additional 22 hydraulic snubbers will be tested until no additional inoperable hydraulic snubbers are found within a sample or until all hydraulic snubbers have been functionally tested; and
- (b) 10% of the safety-related mechanical snubbers shall be functionally tested either in-place or in a bench test.
 - (i) For each mechanical snubber which does not meet the functional test acceptance criteria, an additional sample of 10% of the mechanical snubbers shall be functionally tested.
 - (ii) For each inoperable mechanical snubber found during a resample test, an additional 10% of the mechanical snubbers will be tested until no additional inoperable mechanical snubbers are found within a sample or until all mechanical snubbers have been functionally tested.
- (c) The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from any of the following three categories:
 - 1. The first snubber away from each reactor vessel nozzle.
 - 2. Snubbers within 5 feet of heavy equipment (valve, pump turbine, motor, etc.).
 - 3. Snubbers within 10 feet of the discharge from a safety relief valve.

Snubbers that are especially difficult to remove or in high radiation zones during shutdown shall also be included in the representative sample. Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

- (d) In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included for the resampling.

3.0 **SURVEILLANCE REQUIREMENTS**
3.14 **Shock Suppressors (Snubbers) (Continued)**

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., is frozen in place, the cause will be evaluated. If the cause is a manufacturer or design deficiency, appropriate action shall be taken for snubbers of the same design subject to the same defect to determine if any more defects exist. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test acceptance criteria.

For any snubber(s) found locked up during normal operation or found inoperable following a seismic event, an engineering evaluation shall be performed on the components which are supported by the snubber(s). The purpose of this engineering evaluation shall be to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubber(s) in order to ensure that the supported component remains capable of meeting the designed service. If the engineering evaluation shows the components to be capable of meeting the designed service without the failed snubber, that snubber may be deleted from service per Specification 2.18(4).

(3) **Snubber Service Life Monitoring**

A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 5.10.2.m. On a refueling frequency, the installation and maintenance record for each snubber shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be re-evaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. This re-evaluation, replacement or reconditioning shall be indicated in the records.

Basis

All safety snubbers shall be 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 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.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. The required inspection interval will be based on Table 3-1.

3.0 **SURVEILLANCE REQUIREMENTS**
3.14 **Shock Suppressors (Snubbers) (Continued)**

When a snubber is found locked up or frozen in place or when a snubber has been inoperable during a seismic event, an engineering evaluation shall be performed, in addition to the determination of the snubber mode of failure. The purpose of the engineering evaluation is to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 18 month intervals. Selection of a representative sample of hydraulic snubbers according to the expression $35(1+c/2)$ provides a confidence level of approximately 95% that 90% to 100% of the snubbers in the plant will be operable within acceptance limits. The District selected the value of c to be 3. Observed failures of these sample snubbers shall require functional testing of additional units. For each number of snubbers above c which does not meet the functional test acceptance criteria, an additional sample selected according to the expression $35(1+c/2)(2/(c+1))^{a-c}$ will be functionally tested, where a is the total number of snubbers found inoperable during the functional testing of the representative sample. Functional testing will continue according to the expression $b(35(1+c/2)(2/(c+1))^{a-c})$ where b is the number of snubbers found inoperable in the previous resample until no additional inoperable snubbers are found within a sample or until all snubbers have been functionally tested.

A "10%" criterion is utilized for mechanical snubbers because of the considerably smaller number of mechanical snubbers.

Hydraulic snubbers and mechanical snubbers will each be treated as a different entity for the above surveillance programs.

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (e.g. newly installed snubber, 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. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

TABLE 3-14
SNUBBER VISUAL INSPECTION INTERVAL
NUMBER OF UNACCEPTABLE SNUBBERS

<u>Population</u> (Notes 1 and 2)	<u>Column A</u> <u>Extend Interval</u> (Note 3)	<u>Column B</u> <u>Repeat Interval</u> (Note 4)	<u>Column C</u> <u>Reduce Interval</u> (Note 5)
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

Note 1: The next visual inspection interval for a snubber population shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. The first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the regulations in effect before amendment 145. 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 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 up to a 48 month 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.

TABLE 3-14 (Continued)

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 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.

5.0 ADMINISTRATIVE CONTROLS

5.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Records of drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the Plant Review Committee and the Safety Audit and Review Committee.
- l. Records of Environmental Qualification of Electric Equipment pursuant to 10 CFR 50.49.
- m. Records of the service lives of all hydraulic and mechanical scrubbers ~~which are covered under the provisions of Section 2.18 of the Technical Specifications~~, including the date at which the service life commences and associated installation and maintenance records.
- n. Records of analyses required by the Radiological Environmental Monitoring Program.
- o. Records of reviews performed for changes made to the Offsite Dose Calculation Manual and the Process Control Program.

5.10.3 A complete record of the analysis employed in the selection of any fuel assembly to be placed in Region 2 of the spent fuel racks will be retained as long as that assembly remains in Region 2 (reference Technical Specifications 2.8 and 4.4)

5.11 Radiation Protection Program

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

U.S. Nuclear Regulatory Commission
LIC-96-0071

ATTACHMENT B

DISCUSSION, JUSTIFICATION AND NO SIGNIFICANT HAZARDS CONSIDERATION

DISCUSSION AND JUSTIFICATION

The Omaha Public Power District (OPPD) proposes to revise the Fort Calhoun Station (FCS) Unit No. 1 Technical Specifications (TS) to relocate the operability requirements for shock suppressors (snubbers) from the TS to the Updated Safety Analysis Report (USAR), and to incorporate snubber examination and testing requirements into TS 3.3 which governs components subject to testing in accordance with Section XI of the ASME Boiler & Pressure Vessel Code.

Snubbers are designed to prevent unrestrained pipe motion under dynamic loads that may occur during an earthquake or design basis accident, while allowing normal thermal motion during plant/system startup or shutdown. The consequence of an inoperable snubber is an increase in the probability of structural damage to piping as a result of a seismic, or other event, initiating dynamic loads. TS 2.18 provides operability requirements and allowed outage times for snubbers. TS 3.14 provides requirements on visual inspection, functional testing, and service life monitoring of snubbers.

On July 16, 1993, the NRC issued a Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors. The Final Policy Statement contains four criteria which can be used to determine which constraints on the design and operation of nuclear power plants are appropriate for inclusion in TS. The NRC has incorporated these criteria into 10 CFR 50.36, "Technical specifications." Snubbers do not meet any of the four criteria for inclusion as a Limiting Condition for Operation within the TS, and therefore it is proposed that these requirements be relocated from the TS.

Specification 2.18

It is proposed to relocate the operability requirements for snubbers contained in TS 2.18 to the USAR and/or plant procedures. With the deletion of this TS, it is proposed that the Table of Contents be revised accordingly. Any changes to the operability requirements for snubbers can be made without NRC approval only when the changes meet the criteria of 10 CFR 50.59. Changes to the snubber operability requirements that do not meet the criteria of 10 CFR 50.59 must be approved by the NRC by license amendment.

DISCUSSION AND JUSTIFICATION (Continued)

Specification 3.3

It is proposed to revise TS 3.3(1)a to include applicable supports (snubbers) in the inservice inspection of ASME Code Class 1, Class 2, and Class 3 components. Snubbers are required to be examined and tested in accordance with ASME Section XI by 10 CFR 50.55a except where specific written relief is granted by the NRC. The FCS Inservice Inspection (ISI) Program is in accordance with the 1989 Edition of Section XI and requires that inspections be performed in accordance with the first Addenda to the ASME/ANSI OM-1987, Part 4. OPPD was granted approval by the NRC to perform snubber examinations and testing in accordance with the ASME OMB Code-1992, Subsection ISTD, in lieu of the first Addenda of the ASME/ANSI OM-1987, Part 4. Because examinations and testing must be in accordance with both the TS and ASME Section XI, there are redundancies or differences between visual inspection requirements, visual inspection frequencies, functional testing sample size and content, functional testing expanded scope requirements, and failure evaluation. However, where differences between the deleted sections of the TS and ASME Section XI requirements exist, the Section XI requirements are either similar or more conservative than the TS requirements. The proposed revision to TS 3.3(1)a will ensure that snubber surveillance is performed in accordance with ASME Section XI as required by 10 CFR 50.55a.

Specification 3.14

It is proposed that TS 3.14 be deleted. With the addition of snubbers to TS 3.3(1), the visual and functional testing required by TS 3.14(1) and 3.14(2) will be conducted in accordance with ASME Section XI as required by 10 CFR 50.55a. Therefore, TS 3.14(1) and 3.14(2) are redundant and unnecessary. The requirements of TS 3.14(3) addressing snubber service life monitoring, which is not addressed by the ASME Code, will be relocated to the USAR and/or plant procedures.

Specification 5.10.2

It is proposed to revise TS 5.10.2 to delete the reference to TS 2.18 since it is proposed that TS 2.18 be deleted.

ADMINISTRATIVE CHANGES

It is proposed to add amendment numbers 11, 27, 32, 38, 43, 46, 54, 60, and 97 to the bottom of Page ii of the Table of Contents as amendments that have revised this page. These amendment numbers were inadvertently deleted in a previous amendment.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION:

The proposed changes do not involve significant hazards consideration because operation of Fort Calhoun Station Unit No. 1 in accordance with these changes would not:

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

The proposed change will relocate operability requirements for shock suppressors (snubbers) from the Technical Specifications (TS) to the Updated Safety Analysis Report (USAR) and/or plant procedures. On July 16, 1993, the NRC issued a Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors. The Final Policy Statement contains four criteria which can be used to determine which constraints on the design and operation of nuclear power plants are appropriate for inclusion in TS. The NRC has incorporated these criteria into 10 CFR 50.36, "Technical specifications." Snubbers do not meet any of the four criteria for inclusion as a Limiting Condition for Operations within the TS, and therefore it is proposed that these requirements be relocated from the TS. The proposed change would not reduce or revise any of the current requirements for snubber operability, only relocate the requirements. Any changes to the requirements contained in the USAR and/or plant procedures can be made without NRC approval only when the changes meet the criteria of 10 CFR 50.59. Changes to the snubber operability requirements that do not meet the criteria of 10 CFR 50.59 must be approved by the NRC by license amendment. Therefore, the relocation of the requirements on snubber operability from the TS to the USAR does not increase the probability or consequences of any accident previously analyzed.

The proposed change also deletes sections of the TS which are redundant or in conflict with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. Snubbers are required to be examined and tested in accordance with ASME Section XI by 10 CFR 50.55a. The proposed change will ensure that the TS implement ASME Section XI examination and testing requirements for snubbers in accordance with 10 CFR 50.55a. Where differences between the deleted sections of the TS and ASME Section XI requirements exist, the Section XI requirements are similar or more conservative than the TS. For example, although the functional test sample size differs between the methodologies, both ensure that a very high percentage of the snubbers in the plant are operable within acceptance limits. Therefore, the proposed revision does not reduce the effectiveness of snubber examination and testing.

The proposed change would not reduce the operability requirements, acceptance criteria, or examination and testing of snubbers. Therefore, the proposed change would not increase the probability or consequences of an accident previously evaluated.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION (Continued):

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

There will be no physical alterations to the plant configuration, changes to setpoint values, or changes to the implementation of setpoints or limits as a result of this proposed change.

The proposed change deletes duplicate or conflicting requirements between the TS and the ASME Section XI. In these areas, the proposed deletions would remove the TS requirements and testing would be conducted in accordance with ASME Section XI as directed by 10 CFR 50.55a. Although the requirements of ASME Section XI differ from the TS in some cases, the differences do not decrease the effectiveness of testing and examination as compared to the TS requirements. Other areas, such as snubber operability requirements and service life monitoring, which are presently addressed by TS, but are not covered under ASME Section XI, will be maintained in the USAR so that these requirements cannot be deleted without NRC approval.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

- (3) Involve a significant reduction in a margin of safety.

The proposed change does not reduce the operability, examination, or testing requirements for snubbers. Snubbers will still be required to meet the requirements of ASME Section XI and 10 CFR 50.55a except where specific written relief has been granted by the NRC. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Therefore based on the above considerations, it is OPPD's position that this proposed amendment does not involve significant hazards considerations as defined by 10 CFR 50.92 and the proposed changes will not result in a condition which significantly alters the impact of the Station on the environment. Thus, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and pursuant to 10 CFR 51.22(b) no environmental assessment need be prepared.