

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION CHANGE FOR

NORTH ANNA UNIT 1

8509300257 850919
PDR ADOCK 05000338
P PDR

PLANT SYSTEMS

3/4.7.10 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.10 All snubbers utilized on safety related systems shall be OPERABLE. For those snubbers utilized on non-safety related systems, each snubber shall be OPERABLE if a failure of that snubber or the failure of the non-safety related system would have an adverse effect on any safety related system.

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 4.7.10.c on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

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

a. Visual Inspections

The first inservice visual inspection of snubbers shall be performed after four months but within 10 months of commencing POWER OPERATION and shall include the snubbers defined in 3.7.10. If less than two (2) snubbers 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:

<u>No. Inoperable Snubbers per Inspection Period</u>	<u>Subsequent Visual Inspection Period*[#]</u>
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%

Early inspections (i.e. those performed before 75% of the current inspection period has elapsed) may be used to set new reference surveillance dates for the current inspection period. However, the results of such early inspections cannot be used to increase the current inspection period (period may only stay the same or decrease as determined by the table in 4.7.10.a).

*The inspection interval shall not be lengthened more than one step at a time.

[#]The provisions of Specification 4.0.2 are not applicable.

SURVEILLANCE REQUIREMENTS (Continued)

The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visual indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specifications 4.7.10.d and 4.7.10.e. 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 an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

c. Functional Tests

At least once per 18 months during shutdown, a representative sample of snubbers which follows the expression $35 \left(1 + \frac{c}{2} \right)$, where $c=2$ is

the allowable number of snubbers not meeting the acceptance criteria selected by the operator, shall be functionally tested either in-place or in a bench test. For each number of snubbers above c which does not meet the functional test acceptance criteria of Specification 4.7.10.d or 4.7.10.e, an additional sample selected according to the expression

$$35 \left(1 + \frac{c}{2} \right) \left(\frac{2}{c+1} \right)^2 (a - c)$$

shall be functionally tested, where a is the total number of snubbers found inoperable during the functional testing of the representative sample.

Functional testing shall continue according to the expression

$$b \left[35 \left(1 + \frac{c}{2} \right) \left(\frac{2}{c+1} \right)^2 \right] \text{ where } b \text{ is the number of snubbers}$$

found inoperable in the previous re-sample, until no additional inoperable snubbers are found within a sample or until all snubbers have been functionally tested.

SURVEILLANCE REQUIREMENTS (Continued)

The representative samples 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 samples shall include snubbers from 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 samples.* Accessible and inaccessible snubbers may be used jointly or separately as the basis for the sampling plan.

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 re-sampling.

If any snubber selected for functional testing either fails to lockup 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 design subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test acceptance criteria.

*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.

SURVEILLANCE REQUIREMENTS (Continued)

For the snubber(s) found inoperable, 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 design service.

d. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
2. Snubber bleed, or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

e. Mechanical Snubbers Functional Test Acceptance Criteria

The mechanical snubber functional test shall verify that:

1. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force. Drag force shall not have increased more than 50% since the last functional test.
2. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
3. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

f. 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 6.10.2.

PLANT SYSTEMS

SURVEILLANCE REAUIREMENTS (Continued)

At least once per 18 months, the installation and maintenance records for each snubber defined in 3.7.10 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 reevaluated 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 reevaluation, replacement or reconditioning shall be indicated in the records.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

The following pages are deleted:

3/4 7-34 through 3/4 7-67

PLANT SYSTEMS

BASES

3/4.7.9.1 AND 3/4.7.9.2 RESIDUAL HEAT REMOVAL SYSTEM (RHR)

The OPERABILITY of the RHR system ensures that residual heat removal capability is available below 350°F following plant shutdown. The RHR system is not part of the ECCS system.

3/4.7.10 SNUBBERS

The snubbers defined in Technical Specification 3.7.10 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.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. 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. 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.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order 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. Observed failures of these sample snubbers shall require functional testing of additional units.

ADMINISTRATIVE CONTROLS

- a. Records and 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 operational cycles for those facility components identified in Table 5.9-1.
- g. Records of reactor tests and experiments.
- h. Records of training and qualification for current members of the plant staff.
- i. Records of in-service inspections performed pursuant to these Technical Specifications.
- j. Records of Quality Assurance activities required by the QA Manual.
- k. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- l. Records of meetings of the SNSOC.
- m. Records of meetings of the System Nuclear Safety and Operating Committee to issuance of Amendment No. 30.
- n. Records of the service lives of all hydraulic and mechanical snubbers required to be operable by Technical Specification 3.7.10 including the date at which the service life commences and associated installation and maintenance records.
- o. Records of secondary water sampling and water quality.
- p. Records of Environmental Qualification which are covered under the provisions of paragraph 6.13.
- q. Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This would include procedures effective at specified times and QA records showing that these procedures were followed.

ATTACHMENT 2

PROPOSED TECHNICAL SPECIFICATION CHANGE FOR

NORTH ANNA UNIT 2

PLANT SYSTEMS

3/4.7.10 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.10 All snubbers utilized on safety related systems shall be OPERABLE. For those snubbers utilized on non-safety related systems, each snubber shall be OPERABLE if a failure of that snubber or the failure of the non-safety related system would have an adverse effect on any safety related system.

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 4.7.10.c on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

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

a. Visual Inspections

The first inservice visual inspection of snubbers shall be performed after four months but within 10 months of commencing POWER OPERATION and shall include the snubbers defined in 3.7.10. If less than two (2) snubbers 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:

<u>No. Inoperable Snubbers per Inspection Period</u>	<u>Subsequent Visual Inspection Period*[#]</u>
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%

Early inspections (i.e. those performed before 75% of the current inspection period has elapsed) may be used to set new reference surveillance dates for the current inspection period. However, the results of such early inspections cannot be used to increase the current inspection period (period may only stay the same or decrease as determined by the table in 4.7.10.a).

*The inspection interval shall not be lengthened more than one step at a time.

[#]The provisions of Specification 4.0.2 are not applicable.

The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visual indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specifications 4.7.10.d and 4.7.10.e. 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 an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

c. Functional Tests

At least once per 18 months during shutdown, a representative sample of snubbers which follows the expression $35 \left(1 + \frac{c}{2} \right)$, where $c=2$ is the allowable number of snubbers not meeting the acceptance criteria selected by the operator, shall be functionally tested either in-place or in a bench test. For each number of snubbers above c which does not meet the functional test acceptance criteria of Specification 4.7.10.d or 4.7.10.e, an additional sample selected according to the expression

$$35 \left(1 + \frac{c}{2} \right) \left(\frac{2}{c+1} \right)^2 (a - c)$$

shall be functionally tested, where a is the total number of snubbers found inoperable during the functional testing of the representative sample.

Functional testing shall continue according to the expression

$b \left[35 \left(1 + \frac{c}{2} \right) \left(\frac{2}{c+1} \right)^2 \right]$ where b is the number of snubbers found inoperable in the previous re-sample, until no additional inoperable snubbers are found within a sample or until all snubbers have been functionally tested.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

The representative samples 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 samples shall include snubbers from 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 samples.* Accessible and inaccessible snubbers may be used jointly or separately as the basis for the sampling plan.

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 re-sampling.

If any snubber selected for functional testing either fails to lockup 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 design subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test acceptance criteria.

*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.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

For the snubber(s) found inoperable, 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 design service.

d. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
2. Snubber bleed, or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

e. Mechanical Snubbers Functional Test Acceptance Criteria

The mechanical snubber functional test shall verify that:

1. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force. Drag force shall not have increased more than 50% since the last functional test.
2. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
3. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

f. 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 6.10.2.

PLANT SYSTEMS

SURVEILLANCE REAUIREMENTS (Continued)

At least once per 18 months, the installation and maintenance records for each snubber defined in 3.7.10 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 reevaluated 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 reevaluation, replacement or reconditioning shall be indicated in the records.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

The following pages are deleted:

3/4 7-31 through 3/4 7-50

PLANT SYSTEMS

BASES

3/4.7.9.1 AND 3/4.7.9.2 RESIDUAL HEAT REMOVAL SYSTEM (RHR)

The OPERABILITY of the RHR system ensures that residual heat removal capability is available below 350°F following plant shutdown. The RHR system is not part of the ECCS system.

3/4.7.10 SNUBBERS

The snubbers defined in Technical Specification 3.7.10 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.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. 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. 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.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order 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. Observed failures of these sample snubbers shall require functional testing of additional units.

ADMINISTRATIVE CONTROLS

- g. Records of reactor tests and experiments.
- h. Records of training and qualification for current members of the plant staff.
- i. Records of in-service inspections performed pursuant to these Technical Specifications.
- j. Records of Quality Assurance activities required by the QA Manual.
- k. Records of the service life of all hydraulic and mechanical snubbers required to be operable by Technical Specification 3.7.10 including the date at which the service life commences and associated installation and maintenance records.
- l. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- m. Records of meetings of the SNSOC.
- n. Records of meetings of the System Nuclear Safety and Operating Committee to issuance of Amendment No. _____.
- o. Records of secondary water sampling and water quality.
- p. Records of Environmental Qualification which are covered under the provisions of Paragraph 2.C(4)(e) of License No. NPF-7.
- q. Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This would include procedures effective at specified times and QA records showing that these procedures were followed.

6.11 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.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance

ATTACHMENT 3

DISCUSSION OF PROPOSED CHANGES

DISCUSSION OF PROPOSED CHANGES

The proposed change will add a statement to Technical Specification 3.7.10 specifying which snubbers shall be operable and delete Tables 3.7-4a and 3.7-4b. This Technical Specification change will remove the requirement to update the Technical Specifications when a snubber is added or deleted from the plant. This is in accordance with NRC Generic Letter 84-13 dated May 3, 1984 entitled "Technical Specification For Snubbers." Generic Letter 84-13 recommends that Tables 3.7-4a and 3.7-4b be eliminated from the Technical Specifications. Generic Letter 84-13 also recommends that the Technical Specifications be modified to specify which snubbers are required to be operable. This revision includes a statement specifying "All snubbers utilized on safety related systems shall be OPERABLE. For those snubbers utilized on non-safety related systems, each snubber shall be OPERABLE if a failure of that snubber or the failure of the non-safety related system would have an adverse effect on any safety related system." A list of snubbers will still be maintained as part of the plant records as required by Technical Specification 4.9.7.f. Technical Specification 4.9.7.f requires "a record of the service life of each snubber, the date at which the designated service life commenced and the installation and maintenance records on which the designated service life is based shall be maintained." The addition or deletion of a snubber will be documented in the plant records. These two changes are in accordance with the recommendations of Generic Letter 84-13. Also references to Tables 3.7-4a and 3.7-4b have been deleted from the Technical Specifications.

The proposed change will also add a statement to surveillance requirement 4.7.10.a regarding the early inspection of snubbers. Early inspections can be used to set a new reference inspection date. However, the results of such early inspections cannot be used to increase the inspection interval. This statement is present in the bases section of the technical specifications and is being added to the surveillance requirements for clarification purposes. This statement is also consistent with the recommendation of Generic Letter 84-13.

In section 4.7.10.c, the expression that is used to determine the sample size for additional functional testing of snubbers (should it be required) has been modified in accordance with Generic Letter 84-13.

The exemptions from functional testing for large snubbers greater than 50 kips during the Cycle 3 refueling and maintenance outage for Unit 1, and the Cycle 1 refueling and maintenance outage for Unit 2 have been deleted since these outages have been completed.

50.59 Safety Review

Pursuant to 10 CFR 50.59, we have reviewed the proposed Technical Specification changes and have concluded that no unreviewed safety question exists since (i) the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased by these proposed changes; (ii) the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not being created by these proposed changes; (iii) the margin of safety as defined in the basis for any technical specification is not reduced by these proposed changes because the operability and performance of the snubbers has not been affected since these changes are administrative in nature.

50.92 Significant Hazards Review

The proposed changes do not pose a significant hazards consideration as defined in 10 CFR 50.92. The Commission has provided examples of changes that constitute no significant hazards consideration in Federal Register, Volume 48, page 14870. Example (i) is a purely administrative change to technical specifications, for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature. Example (vii) is a change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations in keeping with the regulations. The proposed changes to delete one time exemptions which have expired and to add a statement to the surveillance requirement which is presently in the Bases section are similar to example (i) in that they are administrative in nature. The proposed changes to delete the snubber tables and modify the expression determining sample size are similar to example (vii) in that they are consistent with the guidance provided in Generic Letter 84-13.

Based on these examples, it has been concluded that the proposed changes do not pose a significant hazards consideration.

ATTACHMENT 4

APPLICATION FEE

VIRGINIA ELECTRIC AND POWER COMPANY

CHECK VOUCHER
1576BANK NO. 25CHECK NO. 95956DATE 08/12/85VENDOR NO. 3301

LINE	DATE	INVOICE NO/OR DESCRIPTION	GROSS AMOUNT	DISCOUNT	NET AMOUNT
1	08/06/85	APPLICATION FEE	150.00	0.00	150.00

ATTACHED CHECK ISSUED AS PAYMENT OF ITEMS LISTED ABOVE - PLEASE DETACH STUB AND CASH CHECK PROMPTLY.

VepcoBANK OF VIRGINIA
WHITE STONE, VA

VOID IF NOT CASHED IN 90 DAYS

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA68 589
514

03301 25 0095956 00000015000

PAY ONE HUNDRED FIFTY AND 00/100 DOLLARS

TO THE UNITED STATES NUCLEAR
ORDER REGULATORY COMMISSION
OF NUCLEAR REG C DC 20555

BK	CHECK NO	DATE	VENDOR NO	AMOUNT
25	95956	08/12/85	3301	\$150.00

03301 25 0095956 00000015000

⑈0488722⑈ ⑆051405890⑆ 552⑈7110810⑈

LRHorton