ELECTRICAL POWER SYSTEMS

3/4.8.4 ELECTRICAL EQUIPMENT PROTECTIVE DEVICES

CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES

LIMITING CONDITION FOR OPERATION

3.8.4.1 All containment penetration conductor overcurrent protective devices shown in Table 3.8-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

a. With one or more of the above required containment penetration conductor overcurrent devices shown in Table 3.8-1 inoperable:

1. Restore the protective device(s) to OPERABLE status or deenergize the circuit(s) by tripping, racking out, or removing the alternate device or racking out or removing the inoperable device within 72 hours, and

2. Declare the affected system or component inoperable, and

3. Verify at least once per 7 days thereafter the alternate device is tripped, racked out, or removed, or the device is racked out or removed.

Otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. The provisions of Specification 3.0.4 are not applicable to overcurrent devices which have the inoperable device racked out or removed or, which have the alternate device tripped, racked out, or removed.

SURVEILLANCE REQUIREMENTS

4.8.4.1 All containment penetration conductor overcurrent protective devices shown in Table 3.8-1 shall be demonstrated OPERABLE:

a. At least once per 18 months:

1. By verifying that the medium voltage (4-15 kV) circuit breakers are OPERABLE by selecting, on a rotating basis, at least 10% of the circuit breakers of each voltage level, and performing the following:

(a) A CHANNEL CALIBRATION of the associated protective relays, and

(b) An integrated system functional test which includes simulated automatic actuation of the system and verifying that each relay and associated circuit breakers and control circuits function as designed and as specified in Table 3.8-1.

SURVEILLANCE REQUIREMENTS (Continued)

(c) For each circuit breaker found inoperable during these functional tests, an additional representative sample of at least 10% of all the circuit breakers of the inoperable type shall also be functionally tested until no more failures are found or all circuit breakers of that type have been functionally tested.

2. By selecting and functionally testing a representative sample of at least 10% of each type of lower voltage circuit breakers. Circuit breakers selected for functional testing shall be selected on a rotating basis. Testing of these circuit breakers, except as noted on Table 3.8-1, shall consist of injecting a current in excess of the breakers' nominal setpoint and measuring the response time. The measured response time will be compared to the manufacturer's data to ensure that it is less than or equal to a value specified by the manufacturer. Circuit breakers found inoperable during functional testing shall be restored to OPERABLE status prior to resuming operation. For each circuit breaker found inoperable during these functional tests, an additional representative sample of at least 10% of all the circuit breakers of the inoperable type shall also be functionally tested until no more failures are found or all circuit breakers of that type have been functionally tested.

b. At least once per 60 months by subjecting each circuit breaker to an inspection and preventive maintenance in accordance with procedures prepared in conjunction with its manufacturer's recommendations.

TABLE 3.8-1 (Continued)

480 VOLTS POWER FROM MCCs (Continued)

ITEM NO.	SYSTEM POWERED	PROTECTION	OVERCURRENT PROTECTIVE DEVICES				REMARKS
			DEVICE	TYPE	TRIP SETPOINT (NOTE 1)	TIME-CURRENT CHARACTERISTIC	
7	Safety Inj. Tank 1B Iso. Val. 1SI-V1506 Tk 1B (SI-331B)	Primary	Breaker	EF	65	Notes 2, 3	
		Backup	Fuse	TRS	65	Note 4	
8	Safety Inj. Tank 2B Iso. Val. 1SI-V1508 Tk 1B (SI-332B)	Primary	Breaker	EF	65	Notes 2, 3	
		Backup	Fuse	TRS	65	Note 4	
9	LP-310	Primary	Breaker	EF	66	Notes 2, 3	
		Backup	Fuse	TRS	66	Note 4	
10	RCS Loop 1 SDC Iso. Val. 1SI-V1502B (SI-401B)	Primary	Breaker	EF	67	Notes 2, 3	
		Backup	Fuse	TRS	67	Note 4	
11	CARS Suction Val. 2HV-F254B (CAR-201B)	Primary	Breaker	EF	68	Notes 2, 3	
		Backup	Fuse	TRS	68	Note 4	
12	Hydraulic Pump For Val. 1SI-V1501B (SI-405B)	Primary	Breaker	EF	68	Notes 2, 3	
		Backup	Fuse	TRS	68	Note 4	

TABLE 3.8-1 (Continued)

120 VOLTS CONTROL POWER FROM PDPs OR MCCs (Continued)

ITEM NO.	SYSTEM POWERED	PROTECTION	OVERCURRENT PROTECTIVE DEVICES				REMARKS
			TRIP SETPOINT (NOTE 1)				
			SHEET NO.	CIRCUIT NO.	DEVICE	TYPE/TIME-CURRENT CHARACTERISTIC (NOTE 2)	
52	Motor Htr. Leads AH-1 (3D-SB)	Primary	121	Ckt. 15	Breaker	EE	
		Backup	121A	F4	Fuse	TRS	
53	Motor Htr. Leads E-16 (3B)	Primary	CWD 1141		Breaker	TED	120/208V SWGR heater bus, double breaker protection.
		Backup	CWD 1141		Breaker	TED	
54	Motor Htr. Leads E-16 (3D)	Primary	CWD 1142		Breaker	TED	120/208V SWGR heater bus, double breaker protection.
		Backup	CWD 1142		Breaker	TED	
55	Cont. Fan Coolers Dampers	Primary	121	Ckt. 17	Breaker	EE	
		Backup	121A	F5	Fuse	TRS	
56	Samp. Sys. Sol. Valve 2SL-F601 (PSL-404A)	Primary	148A	Ckt. 49	Breaker	CD	
		Backup	148A	Ckt. 49	Fuse	FRN	
57	Samp. Sys. Sol. Valve 2SL-F603 (PSL-404B)	Primary	148	Ckt. 45	Breaker	CD	
		Backup	148A	Ckt. 45	Fuse	FRN	
58	Samp. Sys. Recorder Panel	Primary	133	Ckt. 35	Breaker	EE	
		Backup	133A	F12	Fuse	TRS	

TABLE 3.8-1 (Continued)

120 VOLTS CONTROL POWER FROM PDPs OR MCCs (Continued)

ITEM NO.	SYSTEM POWERED	PROTECTION	OVERCURRENT PROTECTIVE DEVICES				REMARKS
			TRIP SETPOINT (NOTE 1)				
			SHEET NO.	CIRCUIT NO.	DEVICE	TYPE/TIME-CURRENT CHARACTERISTIC (NOTE 2)	
65	Sol. Valves 3CC-P1503A2 (CC-666A) & 3CC-P1507A2 (CC-680A)	Primary	150	Ckt. 27	Breaker	TEB	
		Backup	CWD 282	F1	Fuse	ATM	
66	RCP1A Instrumentation and Accessories	Primary	CWD 220		Fuse	OTS	Two fuses in series, one each, + and - poles.
		Backup	CWD 220		Fuse	OTS	
67	RCP2A Instrumentation and Accessories	Primary	CWD 240		Fuse	OTS	Two fuses in series, one each, + and - poles.
		Backup	CWD 240		Fuse	OTS	
68	CEDM Cool. Valves & Dampers	Primary	149	Ckt. 14	Breaker	TEB	
		Backup	CWD 1145	F2	Fuse	ATM	
69	CEDM Cool. Units Inlet Damper	Primary	150	Ckt. 20	Breaker	TEB	
		Backup	CWD 1145	F1	Fuse	ATM	
70	Sol. Valve 2CH-F1514AB (RC-602)	Primary	150	Ckt. 5	Breaker	TEB	
		Backup	CWD 326	F2	Fuse	ATM	
71	Sol. Valve 2BM-P237 (GWM-101)	Primary	135	Ckt. 11	Breaker	EE	
		Backup	CWD 401	F1	Fuse	ATM	

ATTACHMENT B

TABLE 3.8-1 (Continued)

480 VOLTS POWER FROM MCCs (Continued)

ITEM NO.	SYSTEM POWERED	PROTECTION	OVERCURRENT PROTECTIVE DEVICES				REMARKS
			DEVICE	TYPE	TRIP SETPOINT (NOTE 1)	TIME-CURRENT CHARACTERISTIC	
7	Safety Inj. Tank 1B Iso. Val. 1SI-V1506 Tk 1B (SI-331B)	Primary	Breaker	EF	65	Notes 2, 3	
		Backup	Fuse	TRS	65	Note 4	
8	Safety Inj. Tank 2B Iso. Val. 1SI-V1508 Tk 2B (SI-332B)	Primary	Breaker	EF	65	Notes 2, 3	
		Backup	Fuse	TRS	65	Note 4	
9	LP-310	Primary	Breaker	EF	66	Notes 2, 3	
		Backup	Fuse	TRS	66	Note 4	
10	RCS Loop 1 SDC Iso. Val. 1SI-V1502B (SI-401B)	Primary	Breaker	EF	67	Notes 2, 3	
		Backup	Fuse	TRS	67	Note 4	
11	CARS Suction Val. 2HV-F254B (CAR-201B)	Primary	Breaker	EF	68	Notes 2, 3	
		Backup	Fuse	TRS	68	Note 4	
12	Hydraulic Pump For Val. 1SI-V1501B (SI-405B)	Primary	Breaker	EF	68	Notes 2, 3	
		Backup	Fuse	TRS	68	Note 4	

TABLE 3.8-1 (Continued)

120 VOLTS CONTROL POWER FROM PDPs OR MCCs (Continued)

ITEM NO.	SYSTEM POWERED	PROTECTION	OVERCURRENT PROTECTIVE DEVICES				REMARKS
			TRIP SETPOINT (NOTE 1)			TYPE/TIME-CURRENT CHARACTERISTIC (NOTE 2)	
			SHEET NO.	CIRCUIT NO.	DEVICE		
52	Motor Htr. Leads AH-1 (3D-SB)	Primary	121	Ckt. 15	Breaker	EE	
		Backup	121A	F4	Fuse	TRS	
53	Motor Htr. Leads E-16 (3B)	Primary	CWD 1141		Breaker	TED	120/208V SWGR heater bus, double breaker protection.
		Backup	CWD 1141		Breaker	TED	
54	Motor Htr. Leads E-16 (3D)	Primary	CWD 1142		Breaker	TED	120/208V SWGR heater bus, double breaker protection.
		Backup	CWD 1142		Breaker	TED	
55	Cont. Fan Coolers Dampers	Primary	121	Ckt. 17	Breaker	EE	
		Backup	121A	F5	Fuse	TRS	
56	Samp. Sys. Sol. Valve 2SL-F601 (PSL-404A)	Primary	148A	Ckt. 49	Breaker	CD	
		Backup	148A	Ckt. 49	Fuse	FRN	
57	Samp. Sys. Sol. Valve 2SL-F603 (PSL-404B)	Primary	148A	Ckt. 45	Breaker	CD	
		Backup	148A	Ckt. 45	Fuse	FRN	
58	Samp. Sys. Recorder Panel	Primary	133	Ckt. 35	Breaker	EE	
		Backup	133A	F12	Fuse	TRS	

TABLE 3.8-1 (Continued)

120 VOLTS CONTROL POWER FROM PDPs OR MCCs (Continued)

ITEM NO.	SYSTEM POWERED	PROTECTION	OVERCURRENT PROTECTIVE DEVICES				REMARKS
			TRIP SETPOINT (NOTE 1) SHEET NO.	CIRCUIT NO.	DEVICE	TYPE/TIME-CURRENT CHARACTERISTIC (NOTE 2)	
65	Sol. Valves 3CC-P1503A2 (CC-666A) & 3CC-P1507A2 (CC-680A)	Primary	150	Ckt. 27	Breaker	TEB	
		Backup	CWD 282	F1	Fuse	ATM	
66	RCP1A Instrumentation and Accessories	Primary	CWD 220		Fuse	OTS	Two fuses in series, one each, + and - poles.
		Backup	CWD 220		Fuse	OTS	
67	RCP2A Instrumentation and Accessories	Primary	CWD 240		Fuse	OTS	Two fuses in series, one each, + and - poles.
		Backup	CWD 240		Fuse	OTS	
68	CEDM Cool. Valves & Dampers	Primary	149	Ckt. 14	Breaker	TEB	
		Backup	CWD 1145	F2	Fuse	ATM	
69	CEDM Cool. Units Inlet Damper	Primary	150	Ckt. 20	Breaker	TEB	
		Backup	CWD 1145	Fi	Fuse	ATM	
70	Sol. Valve 2CH-F1514AB (RC-602)	Primary	150	Ckt. 5	Breaker	TEB	
		Backup	CWD 326	F2	Fuse	ATM	
71	Sol. Valve 7BM-P237 (GWM-101)	Primary	135	Ckt. 11	Breaker	EE	
		Backup	CWD 401	F1	Fuse	ATM	

NPF-38-05

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-38-05

This is a request to revise Technical Specification 3/4.7.8, "Snubbers", by correcting the first inservice visual inspection period for inaccessible snubbers.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Description:

Technical Specification 4.7.8 delineates the surveillance requirements for hydraulic and mechanical snubbers. In particular, item (b) allows for independent inspection of accessible and inaccessible snubbers, and requires:

> 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 hydraulic and mechanical snubbers.

Waterford 3 power operation commenced on March 18, 1985 placing the beginning of the initial snubber inservice visual inspection period at July 18, 1985. However, in order to take advantage of an unscheduled outage, LP&L performed an inservice visual inspection of inaccessible hydraulic and mechanical snubbers during mid-June, 1985 - approximately 3 months after commencing power operation.

The requested Technical Specification change would alter the beginning of the first inservice visual inspection period from 4 months to 2 months post-power operation for inaccessible snubbers only. Technical Specification 4.7.8.b would be footnoted to reflect the change. With this change LP&L will be allowed to take credit for the June, 1985 visual inspection of inaccessible snubbers, precluding a potential future plant shutdown during the 4-10 month period that may have been required for inaccessible snubber inspection.

Safety Analysis

The proposed change described above shall be deemed to involve a significant hazards consideration if there is a positive finding in any of the following areas:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of any accident previously evaluated?

   Response: NO

   The proposed change allows LP&L to take credit for a visual inspection of inaccessible snubbers conducted approximately 3 months after commencing power operation rather than the 4 months required by the existing Technical Specification. The time period from initial power operation to the beginning of the visual inspection period is intended to ensure exposure of the snubbers to representative plant conditions.

   The operating history of Waterford 3 over the initial 3 month period covers several heat-ups and cool-downs along with numerous plant trips, both planned and inadvertent. This 3 month history constitutes a representative exposure window for validation of the initial snubber inspection and validation of snubber operability. An additional month's delay of the initial inspection to mid-July provides little additional exposure (one heat-up and several inadvertent trips) due to outages experienced during that time.

   Additionally, the proposed change is in conformance with ANSI/ASME Standard OM4-1982, "Dynamic Restraints Examination and Performance Testing". Section 3.2.3, Inservice Examination Frequency, states:

   > The initial inservice examination of all snubbers shall be initiated after at least 2 months of power operation and shall be completed prior to 12 calendar months after initial criticality.

   Based on the low system demands occurring during the fourth month of power operation, and the technical guidance of ANSI/ASME OM4-1982, the proposed change will not involve a significant increase in the probability or consequences of any accident previously evaluated.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: NO

   The proposed change deals only with a scheduling interval and introduces no new systems, procedures or modes of operation. As discussed above, the inaccessible snubbers received a representative exposure to plant conditions prior to the initial inspection, ensuring an adequate basis for operability determination. Subsequent inaccessible snubber inspection will be scheduled in accordance with the existing Technical Specification formula for inspection frequency.

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

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

Response: NO

The inaccessible snubbers were inspected following a representative exposure period, and deficiencies were corrected as necessary. In accordance with the Technical Specification the next inspection of inaccessible snubbers will be scheduled based upon the results of the initial inspection.

Therefore, the proposed change will not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (vi) relates to a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the changes are clearly within all acceptance criteria with respect to the system or component specified in the Standard Review Plan (SRP).

In the case of the initial inaccessible snubber inservice inspection period, the nearly 3 month period from initial power operation for Waterford 3 sufficiently exercised the snubbers and associated systems to provide a representative "shakedown" period. The proposed change allows LP&L to take credit for the 3 month inspection conducted during an outage. While the SRP is silent as to the beginning of the initial inspection period, the 3 month inspection is clearly within the guidance of ANSI/ASME OM4-1982. Therefore the proposed change is similar to example (vi).

Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10CFR50.91; and (2) there is a reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

ATTACHMENT A

3/4.7.8 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.8 All hydraulic and mechanical snubbers shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those OPERATIONAL MODES.

ACTION:

With one or more snubbers inoperable on any system, 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.

SURVELLIANCE REQUIREMENTS

4.7.8 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
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 hydraulic and mechanical snubbers. If all snubbers of each type on any system are found OPERABLE during the first inservice visual inspection, the second inservice visual inspection of that system shall be performed at the first refueling outage. Otherwise, subsequent visual inspections of a given system shall be performed in accordance with the following schedule:

SURVEILLANCE REQUIREMENTS (Continued)

No. of Inoperable Snubbers of Each Type on Any System per Inspection Period	Subsequent Visual Inspection Period*#
0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3,4	124 days ± 25%
5,6,7	62 days ± 25%
8 or more	31 days ± 25%

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: (1) there are no visible indications of damage or impaired OPERABILITY and (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 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 on that system that may be generically suspectible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specifications 4.7.8f. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers. For those snubbers common to more than one system, the OPERABILITY of such snubbers shall be considered in assessing the surveillance schedule for each of the related systems.

d. Transient Event Inspection

An inspection shall be performed of all hydraulic and mechanical snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems within 6 months following such an event. 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; or (3) stroking the mechanical snubber through its full range of travel.

*The inspection interval for each type of snubber on a given system 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 on that system.

#The provisions of Specification 4.0.2 are not applicable.

e. Functional Tests

During the first refueling shutdown and at least once per 18 months thereafter during shutdown, 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 Regional Administrator 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 total of each type of snubber shall be functionally tested either in-place or in a bench test. For each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.8f., an additional 10% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested; or

2) A representative sample of each type of snubber shall be functionally tested in accordance with Figure 4.7-1. "C" is the total number of snubbers of a type found not meeting the acceptance requirements of Specification 4.7.8f. The cumulative number of snubbers of a type 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 of that type shall be functionally tested. If at any time the point plotted falls in the "Accept" region, testing of snubbers of that type may be terminated. When the point plotted lies in the "Continue Testing" region, additional snubbers of that type shall be tested until the point falls in the "Accept" region or the "Reject" region, or all the snubbers of that type 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 55 snubbers shall be functionally tested. For each snubber type which does not meet the functional test acceptance criteria, another sample of 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. The results from this sample plan shall be plotted using an "Accept" line which follows the equation $N = 55(1 + C/2)$. Each snubber point should be plotted as soon as the snubber is tested. If the point plotted falls on or below the "Accept" line, testing of that type of snubber may be terminated. If the point plotted falls above the "Accept" line, testing must continue until the point falls in the "Accept" region or all the snubbers of that type have been tested.

The representative sample selected for the functional test sample plans shall be randomly selected from the snubbers of each type 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 size, and capacity of snubbers of each type. 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 the 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;

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 directions 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 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 lock up 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 functionally tested. 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 the freedom-of-motion test must have been performed within 12 months before being installed in the unit.

i. Snubber Seal Replacement Program

The service life of hydraulic and mechanical snubbers shall be monitored to ensure that the service life is not exceeded between surveillance inspections. The maximum expected service life for various seals, springs, and other critical parts shall be determined and established based on engineering information and shall be extended or shortened based on monitored test results and failure history. Critical parts shall be replaced so that the maximum service life will not be exceeded during a period when the snubber is required to be OPERABLE. The parts replacements shall be documented and the documentation shall be retained in accordance with Specification 6.10.3.

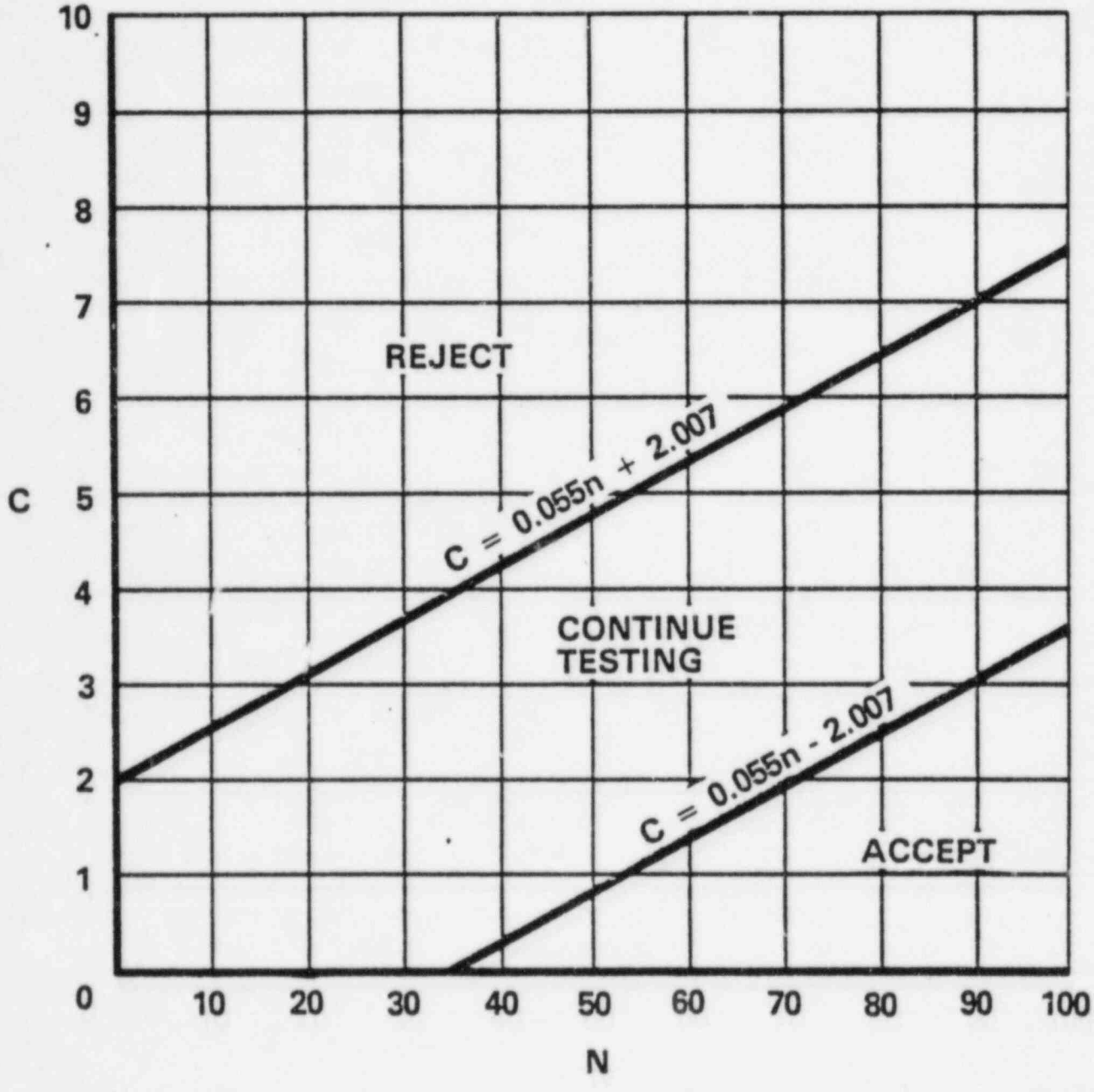

FIGURE 4.7-1

SAMPLING PLAN FOR SNUBBER FUNCTIONAL TEST

ATTACHMENT B

3/4.7.8 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.8 All hydraulic and mechanical snubbers shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those OPERATIONAL MODES.

ACTION:

With one or more snubbers inoperable on any system, 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.

SURVELLIANCE REQUIREMENTS

4.7.8 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
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 hydraulic and mechanical snubbers. If all snubbers of each type on any system are found OPERABLE during the first inservice visual inspection, the second inservice visual inspection of that system shall be performed at the first refueling outage. Otherwise, subsequent visual inspections of a given system shall be performed in accordance with the following schedule:

* Visual inspection of the inaccessible snubbers can be performed at the first available outage after 2 months of commencing Power Operation.

SURVEILLANCE REQUIREMENTS (Continued)

No. of Inoperable Snubbers of Each Type on Any System per Inspection Period	Subsequent Visual Inspection Period**#
0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3,4	124 days ± 25%
5,6,7	62 days ± 25%
8 or more	31 days ± 25%

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: (1) there are no visible indications of damage or impaired OPERABILITY and (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 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 on that system that may be generically suspectible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specifications 4.7.8f. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers. For those snubbers common to more than one system, the OPERABILITY of such snubbers shall be considered in assessing the surveillance schedule for each of the related systems.

d. Transient Event Inspection

An inspection shall be performed of all hydraulic and mechanical snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems within 6 months following such an event. 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; or (3) stroking the mechanical snubber through its full range of travel.

**The inspection interval for each type of snubber on a given system 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 on that system.

#The provisions of Specification 4.0.2 are not applicable.

NPF-38-06

DESCRIPTION AND SAFETY ANALYSIS

OF PROPOSED CHANGE NPF-38-06

This is a request to revise Technical Specification 3/4.9.7, "Crane Travel - Fuel Handling Building".

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Description

The purpose of Technical Specification 3/4.9.7 is to restrict movement of loads in excess of the nominal weight of a fuel assembly, control element assembly (CEA), and associated handling tool over other fuel assemblies in the spent fuel pool to ensure that in the event this load is dropped (1) the activity release will be limited to that contained in a single fuel assembly, and (2) any possible distortion of fuel in the storage racks will not result in a critical array. The original intent of the Specification, as it relates to new fuel, was to require new fuel within the spent fuel pool be handled by the spent fuel handling machine to protect against damage to irradiated fuel.

The proposed change to Technical Specification 3.9.7 will clarify that the use of the spent fuel handling machine is not required for movement of new fuel assemblies outside the spent fuel pool and will also allow for movement of new fuel assemblies in areas other than the spent fuel pool if the spent fuel handling machine is inoperable.

Along this line, the proposed change will bring Technical Specification 3/4.9.7 into conformance with FSAR 9.1.4 which specifies the use of other fuel handling equipment (cask crane, new fuel elevator, etc.) for the movement of new fuel outside the spent fuel pool.

The proposed change consists of the following two parts:

(a) Technical Specification 3.9.7 currently states in part,

> "Cranes in the fuel handling building shall be restricted as follows: a. The spent fuel handling machine shall be used for the movement of fuel assemblies (with or without CEAs) and shall be OPERABLE with...."

The proposed change will add the following note of clarification:

"Not required for movement of new fuel assemblies outside the spent fuel pool."

(b) The proposed change will add the following Action Statement to Technical Specification 3.9.7:

"The provisions of Specification 3.0.4 are not applicable."

Specification 3.0.4 normally prevents entry into the applicable mode or condition (movement of fuel assemblies in this case) unless the conditions of the Limiting Condition for Operation are met. This added Action Statement will allow for the start of new fuel movement in areas other than the spent fuel pool while in Action Statement a (inoperable spent fuel handling machine).

The proposed change described above shall be deemed to involve a significant hazards consideration if there is a positive finding in any of the following areas:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of any accident previously evaluated?

   Response: NO

   The Fuel Handling Accident Analysis in FSAR Chapter 15 is based on the Fuel Handling System described in FSAR Subsection 9.1.4. The proposed change only allows for the use of fuel handling equipment as described by FSAR Subsection 9.1.4 and continues to restrict the movement of heavy loads over fuel assemblies in the spent fuel pool. Therefore, the proposed change will not involve any increase in the probability or consequences of any accident previously evaluated.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: NO

   Operation of the facility will be in accordance with the assumptions made in the FSAR and the Technical Specification that fuel will be handled in accordance with the designed Fuel Handling System and movement of heavy loads in the spent fuel pool will be restricted. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

   Response: NO

   Operation of the facility will be in accordance with the assumptions made in the FSAR and the Technical Specification that fuel will be handled in accordance with the designed fuel handling system and movement of heavy loads in the spent fuel pool will be restricted. Therefore, the proposed change will not involve any reduction in the margin of safety.

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (i) relates to a purely administrative change to technical specifications, (i.e., a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature).

The proposed change to Technical Specification 3/4.9.7 as described in parts a and b above, will allow for the use of fuel handling equipment designed and intended for the movement of new fuel outside the spent fuel pool and bring the Technical Specification into conformance with the FSAR. Therefore, the proposed change is similar to example (i).

Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10CFR50.92; and (2) there is a reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

ATTACHMENT A

REFUELING OPERATIONS

3/4.9.7 CRANE TRAVEL - FUEL HANDLING BUILDING

LIMITING CONDITION FOR OPERATION

3.9.7 Cranes in the fuel handling building shall be restricted as follows:

a. The spent fuel handling machine shall be used for the movement of fuel assemblies (with or without CEAs) and shall be OPERABLE with:

1. A minimum hoist capacity of 1800 pounds, and

2. An overload cutoff limit of less than or equal to 1900 pounds, and,

b. Loads in excess of 2000 pounds shall be prohibited from travel over fuel assemblies in the spent fuel pool.

APPLICABILITY: During movement of fuel assemblies in the fuel handling building, or with fuel assemblies in the spent fuel pool.

ACTION:

a. With the spent fuel handling machine inoperable, suspend the use of the spent fuel handling machine for movement of fuel assemblies and place the crane load in a safe position.

b. With loads in excess of 2000 pounds over fuel assemblies in the spent fuel pool, place the crane load in a safe position.

SURVEILLANCE REQUIREMENTS

4.9.7.1 The spent fuel handling machine shall be demonstrated OPERABLE within 72 hours prior to the start of fuel assembly movement and at least once per 7 days thereafter by performing a load test of at least 1800 pounds and demonstrating the automatic load cutoff when the hoist load exceeds 1900 pounds.

4.9.7.2 The electrical interlock system which prevents crane main hook travel over fuel assemblies in the spent fuel pool shall be demonstrated OPERABLE within 7 days prior to crane use and at least once per 7 days thereafter during crane operation.

4.9.7.3 Administrative controls which prevent crane auxiliary hook travel with loads in excess of 2000 pounds over the fuel assemblies in the spent fuel pool shall be enforced during crane operations.

ATTACHMENT B

REFUELING OPERATIONS

3/4.9.7 CRANE TRAVEL - FUEL HANDLING BUILDING

LIMITING CONDITION FOR OPERATION

3.9.7 Cranes in the fuel handling building shall be restricted as follows:

a. The spent fuel handling machine shall be used* for the movement of fuel assemblies (with or without CEAs) and shall be OPERABLE with:

1. A minimum hoist capacity of 1800 pounds, and

2. An overload cutoff limit of less than or equal to 1900 pounds, and,

b. Loads in excess of 2000 pounds shall be prohibited from travel over fuel assemblies in the spent fuel pool.

APPLICABILITY: During movement of fuel assemblies in the fuel handling building, or with fuel assemblies in the spent fuel pool.

ACTION:

a. With the spent fuel handling machine inoperable, suspend the use of the spent fuel handling machine for movement of fuel assemblies and place the crane load in a safe position.

b. With loads in excess of 2000 pounds over fuel assemblies in the spent fuel pool, place the crane load in a safe position.

c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.7.1 The spent fuel handling machine shall be demonstrated OPERABLE within 72 hours prior to the start of fuel assembly movement and at least once per 7 days thereafter by performing a load test of at least 1800 pounds and demonstrating the automatic load cutoff when the hoist load exceeds 1900 pounds.

4.9.7.2 The electrical interlock system which prevents crane main hook travel over fuel assemblies in the spent fuel pool shall be demonstrated OPERABLE within 7 days prior to crane use and at least once per 7 days thereafter during crane operation.

4.9.7.3 Administrative controls which prevent crane auxiliary hook travel with loads in excess of 2000 pounds over the fuel assemblies in the spent fuel pool shall be enforced during crane operations.

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* Not required for movement of new fuel assemblies outside the spent fuel pool.

NPF-38-07

DESCRIPTION AND SAFETY ANALYSIS

OF PROPOSED CHANGE NPF-38-07

This is a request to revise Technical Specification 3/4.7.2, "Steam Generator Pressure/Temperature Limits".

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Description

The purpose of Technical Specification 3/4.7.2 is to ensure the steam generator secondary pressure and temperature is limited so that pressure induced stresses in the steam generators do not exceed the maximum allowable fracture toughness stress limits. The purpose of Specification 3.7.2(b) is to ensure, in the event of a low temperature overpressurization of the steam generator secondary, that an engineering evaluation is completed and it is determined that the steam generator remains acceptable for continued operation prior to increasing its temperature above 115°F.

The proposed change will allow for steam generator temperatures up to 200°F prior to completion of the engineering evaluation. The present temperature value of 115°F in Specification 3.7.2(b) is an error. The 115°F value is the lowest service temperature of the secondary side of the steam generator which, if not maintained, requires the system pressure be limited to below 20% of the secondary hydrostatic test pressure. While this value was appropriately used to replace the Standard Technical Specification temperature limitations during the development of the Waterford 3 Technical Specifications, the Standard Technical Specification temperature limitation of 200°F prior to completion of the engineering evaluation should not have been changed. Raising the temperature limitation of Specification 3.7.2(b) to 200° is more conservative in the event of an overpressure condition and provides for more operational flexibility.

Safety Analysis

The proposed change described above shall be deemed to involve a significant hazards consideration if there is a positive finding in any of the following areas:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of any accident previously evaluated?

   Response: NO

The lowest service temperature for the secondary side of the steam generators is 115°F. The Technical Specification, as currently written, limits the temperature to 115°F or below and is non-conservative because it unnecessarily exposes the steam generator to brittle failure in the event of an overpressure condition. The proposed change allows for temperatures exceeding the lowest service temperature of 115°F (up to 200°F) providing for a more conservative condition. Therefore, the proposed change will not involve any increase in the probability or consequences of any accident previously evaluated. In fact, the probability of brittle failure will decrease.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: NO

   Temperatures less than 200°F do not impact LOCA or MSLB considerations. The proposed change requires temperatures be maintained to 200°F or less until it is determined that the steam generator remains acceptable for continued operation. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in the margin of safety?

   Response: NO

   The lowest service temperature for the secondary side of the steam generators is 115°F. The Technical Specification, as currently written, limits the temperature to 115°F or below and is non-conservative because it unnecessarily exposes the steam generator to brittle failure in the event of an overpressure condition. The proposed change allows for temperatures exceeding the lowest service temperature of 115°F (up to 200°F) providing for a more conservative condition. Therefore, the proposed change will not involve any reduction, but will increase the margin of safety.

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (i) relates to a purely administrative change to technical specifications, (i.e. a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature).

The proposed change will correct the erroneous temperature value of 115°F by revising Technical Specification 3.7.2(b) to reflect the 200°F temperature value shown in the Standard Technical Specification which is the temperature value originally intended for this Action. Because the proposed change is administrative (correction of an error), it is similar to Example (i).

Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10CFR50.92; and (2) there is a reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

ATTACHMENT A

3/4.7.2 STEAM GENERATOR PRESSURE/TEMPERATURE LIMITATION

LIMITING CONDITION FOR OPERATION

3.7.2 The temperature of the secondary coolant in the steam generators shall be greater than 115°F when the pressure of the secondary coolant is greater than 210 psig.

APPLICABILITY: At all times.

ACTION:

With the requirements of the above specification not satisfied:

a. Reduce the steam generator pressure to less than or equal to 210 psig within 30 minutes, and

b. Perform an engineering evaluation to determine the effect of the overpressurization on the structural integrity of the steam generator. Determine that the steam generator remains acceptable for continued operation prior to increasing its temperatures above 115°F.

SURVEILLANCE REQUIREMENTS

4.7.2 The pressure of the steam generators shall be determined to be less than 210 psig at least once per hour when the temperature of the secondary coolant is less than 115°F.

ATTACHMENT B

3/4.7.2 STEAM GENERATOR PRESSURE/TEMPERATURE LIMITATION

LIMITING CONDITION FOR OPERATION

3.7.2 The temperature of the secondary coolant in the steam generators shall be greater than 115°F when the pressure of the secondary coolant is greater than 210 psig.

APPLICABILITY: At all times.

ACTION:

With the requirements of the above specification not satisfied:

a. Reduce the steam generator pressure to less than or equal to 210 psig within 30 minutes, and

b. Perform an engineering evaluation to determine the effect of the overpressurization on the structural integrity of the steam generator. Determine that the steam generator remains acceptable for continued operation prior to increasing its temperatures above 200°F.

SURVEILLANCE REQUIREMENTS

4.7.2 The pressure of the steam generators shall be determined to be less than 210 psig at least once per hour when the temperature of the secondary coolant is less than 115°F.