

Attachment I to JPN-96-051

PROPOSED TECHNICAL SPECIFICATION CHANGES

(JPTS-96-001)

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

Docket No. 50-333

DPR-59

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I. (DELETED)

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Pages 161 - 162 DELETED

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(B) The following records shall be retained for the duration of the Facility Operating License:

1. Records of any drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
2. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
3. Records of facility radiation and contamination surveys.
4. Records of radiation exposure for all individuals entering radiation control areas.
5. Records of gaseous and liquid radioactive material released to the environs.
6. Records of transient or operational cycles for those facility components identified in Table 6.10-1.
7. Records of training and qualification for current members of the plant staff.
8. Records of in-service inspections performed pursuant to these Technical Specifications.
9. Records of Quality Assurance activities required by the Quality Assurance Manual.
10. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
11. Records of meetings of the PORC and the SRC.
12. Records for Environmental Qualification which are covered under the provisions of paragraph 6.15.
13. DELETED

#### 6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared and adhered to for all plant operations. These procedures shall be formulated to maintain radiation exposures received during operation and maintenance as far below the limits specified in 10 CFR 20 as practicable. The procedures shall include planning, preparation, and training for operation and maintenance activities. They shall also include exposure allocation, radiation and contamination control techniques, and final debriefing.

Attachment II to JPN-96-051

**SAFETY EVALUATION FOR  
PROPOSED TECHNICAL SPECIFICATION CHANGES (JPTS-96-001)**

**New York Power Authority**

**JAMES A. FITZPATRICK NUCLEAR POWER PLANT**  
Docket No. 50-333  
DPR-59

**SAFETY EVALUATION**

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**I. DESCRIPTION OF THE PROPOSED CHANGES**

This section provides a description of the proposed changes to the Technical Specifications (TS). Minor changes in format, such as type font, margins or hyphenation, are not described in this submittal. This type of change is typographical in nature and does not affect the content of the TS.

**DESCRIPTION OF THE PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS**

This amendment proposes to relocate snubber testing requirements from the TS to the ISI program.

Technical Specifications Page ii, Table of contents

Replace the following:

"I. Shock Suppressors (snubbers) I. 145b"

with

"I. DELETED"

Technical Specifications Page vi, List of Tables

Replace the following:

"4.6-1 Snubber Visual Inspection Interval"

with

"4.6-1 (DELETED)"

Technical Specifications Pages 145b through 145g

Delete Pages 145b through 145g

Technical Specifications Page 156

Replace the text in Bases Section 3.6.I and 4.6.I with the following:

"I. (DELETED)"

Technical Specifications Page 156a

Delete Page 156a

Technical Specifications Pages 161 through 162

Replace Pages 161 through 162 with a new Page 161, which will state:

"Pages 161 - 162 DELETED"



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Technical Specifications Page 255

Replace the following:

"13. Records of the service life of all hydraulic and mechanical snubbers, whose failure could adversely affect any safety-related system, including the date at which the service life commences and associated installation and maintenance records as of the effective date of this amendment."

with

"13. DELETED"

**II. PURPOSE OF THE PROPOSED CHANGES**

The purpose of these proposed changes is to relocate snubber operability, surveillance, and record requirements from the TS to plant controlled documents. The proposed change regarding the relocation of the surveillance requirements would facilitate changes needed to conform with NRC imposed ASME Boiler & Pressure Vessel Code requirements for the next ten year Inservice Inspection (ISI) program which commences on June 28, 1997. NRC regulations (10 CFR 50.55a(g)) require the ISI program to conform to the latest edition and addenda of the NRC approved Code in effect 12 months prior to the start of the ten year interval. This requirement invokes the ASME B & PV Code, Section XI, 1989 Edition, for the next FitzPatrick ten year ISI interval. This code invokes the snubber surveillance requirements of standard OMa-1988, Part 4. The snubber surveillance requirements in this standard conflict with the current TS requirements (section 4.6.1). Approval of the proposed change will permit changes to the ISI surveillance program, under the provisions of 10 CFR 50.59, that recognize the NRC imposed Code requirements. Current plans are to locate the snubber surveillance requirements in the ISI program.

Additionally, the amendment proposes to relocate the snubber operability and record requirements from the TS to plant controlled procedures. This change establishes uniformity with the administrative controls, and TS simplification change, proposed above for the surveillance requirements. Current plans are to relocate the snubber operability and record requirements to a plant administrative procedure.

These proposed changes are based on the guidance presented in NUREG-1433 (Reference 1), NEDO-31466 (Reference 2), and the criteria presented in NRC regulation 10 CFR 50.36, and are consistent with NRC and industry efforts to simplify the TS. Revisions to the snubber requirements located outside the TS will be controlled in accordance with the provisions of 10 CFR 50.59, and will conform to the applicable NRC approved edition of the Code. Relief requests will be submitted to the NRC for approval if exceptions to code requirements are necessary. If snubber inoperability causes a TS system or component to be inoperable, then the affected system or component Limiting Condition for Operation (LCO) will be entered. The plant controlled documents associated with the relocated requirements will be referenced in the first FSAR update due more than six months after NRC issuance of the amendment.

NUREG-1433 (Reference 1)

This NUREG contains the improved Standard Technical Specifications (STS) for General

**SAFETY EVALUATION**

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Electric (GE) BWR/4 plants. The Preface in this NUREG states that Licensees are encouraged to upgrade their Technical Specifications to conform with NUREG-1433. Operability, surveillance, and records requirements for snubbers are not included in NUREG-1433.

NEDO-31466 (Reference 2)

This document concludes, in part, that snubbers do not need to be retained in TS. The following excerpt from this document forms the basis for this conclusion:

*"Hydraulic and mechanical snubbers are included in plant design to ensure that the structural integrity of the reactor coolant system and other safety-related systems are maintained during and following a seismic or other dynamic loading event. The snubbers are considered a part of the piping system. They serve as an aid to preventing piping failure, but do not mitigate piping failure. Also, the failure of a snubber on a particular pipe cannot, by itself, cause the pipe to fail. Consequently, the snubbers do not meet any of the criteria since they are not utilized as a part of the primary success path in detecting or mitigating the consequences of a DBA or transient event. Additionally, the surveillance and maintenance of the snubbers can be controlled by sources other than the plant Technical Specifications."*

Code of Federal Regulations, 10 CFR 50.36 (Reference 3)

NRC regulation 10 CFR 50.36, as amended on August 18, 1995, identifies the criteria to be used in determining whether a particular system or component is required to be included in the TS. Existing TS requirements which fall within or satisfy these criteria must be retained in the TS, while those TS requirements which do not fall within or satisfy these criteria may be relocated to other licensee-controlled documents.

The snubber requirements FitzPatrick TS Section 3.6.1 / 4.6.1 do not satisfy the selection criteria in 10 CFR 50.36 for inclusion in the TS since they (1) are not used for detecting a significant abnormal degradation of the reactor coolant pressure boundary, (2) are not an initial condition of a DBA or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier, (3) are not part of the primary success path and do not function or actuate to mitigate a DBA or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier, and (4) do not involve a component for which operating experience or probabilistic safety assessment has shown to be significant to public health and safety. Therefore, the requirements for snubbers can be relocated to plant controlled documents.

**III. SAFETY IMPLICATIONS OF THE PROPOSED CHANGES**

There are no safety implications associated with these changes because:

- if snubber inoperability causes a TS system or component to be inoperable, then the affected system or component Limiting Condition for Operation (LCO) in the TS will be entered. Regulations and FitzPatrick commitments to the NRC contain the necessary programmatic requirements for plant controlled documents.
- the provisions of 10 CFR 50.59 apply to changes made in the plant controlled documents to assure the changes do not involve an unreviewed safety question. The snubber surveillances will conform to NRC approved Codes, unless specific relief is requested from the NRC.

**SAFETY EVALUATION**

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these proposed changes were developed using the guidance contained in NUREG-1433 (Reference 1), NEDO-31466 (Reference 2), and NRC regulation 10 CFR 50.36 (Reference 3), and are consistent with NRC and industry efforts to simplify the TS.

Operating limitations will continue to be imposed, and required surveillances will continue to be performed in accordance with regulations, Fitzpatrick commitments to the NRC, and written procedures and instructions that are auditable by the NRC. Since the proposed amendment only involves the procedures for controlling the snubber requirements, and does not involve changes to the operability and surveillance provisions in the snubber program, the proposed changes are administrative in nature and will not reduce the effectiveness of the snubber program.

**IV. EVALUATION OF NO SIGNIFICANT HAZARDS CONSIDERATION**

Operation of the FitzPatrick plant in accordance with the proposed Amendment will not involve a significant hazards consideration as defined in 10 CFR 50.92, based on the following:

- (1) These changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because:

The changes relocate operability, surveillance, and record requirements for components (snubbers) which do not meet the criteria for inclusion in the Technical Specifications (TS). The affected components are not assumed to be initiators of analyzed events and are not assumed to mitigate accident or transient events. The snubber requirements will be relocated from the TS to plant controlled documents. These requirements will be maintained pursuant to 10 CFR 50.59. Therefore, the changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (2) The changes do not create the possibility of a new or different type of accident previously evaluated because:

The changes do not necessitate a physical alteration of the plant (no new or different type of equipment will be installed) or affect parameters governing normal plant operation. Adequate control of future changes to snubber requirements will be maintained. Thus, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluate for the plant.

- (3) The proposed changes do not involve a reduction in a margin of safety because:

The changes do not involve a change to the operability, surveillance, and record requirements for the snubber program as they currently exist in the TS, nor do they impact on any safety analysis assumptions. The proposed changes relocate snubber requirements from the TS to plant controlled documents. Changes to the requirements in these documents are subject to the requirements of 10 CFR 50.59. In addition, exceptions to code requirements for testing will require NRC approval. Regulations and FitzPatrick commitments to the NRC contain the necessary programmatic requirements for the plant controlled documents. Operating limitations will continue to be imposed, and required surveillances will continue to

**SAFETY EVALUATION**

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be performed in accordance with regulations, Fitzpatrick commitments to the NRC, and written procedures and instructions that are auditable by the NRC. If snubber inoperability causes a TS system or component to be inoperable, then the affected system or component Limiting Condition for Operation (LCO) will be entered. Based on the above, the proposed changes do not involve a significant reduction in a margin of safety.

**V. IMPLEMENTATION OF THE PROPOSED CHANGES**

This amendment request meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) as follows:

- (i) the amendment involves no significant hazards consideration.

As demonstrated in Section IV of this evaluation, the proposed change involves no significant hazards consideration.

- (ii) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

The proposed changes do not involve a physical alteration to the plant, or any changes in plant operating procedures. The proposed changes are administrative in nature in that they relocate the snubber operability, surveillance, and record requirements from the TS to plant controlled procedures. Future changes to these documents are subject to NRC regulations. Therefore, these changes do not change the amounts of any effluents that may be released offsite.

- (iii) there is no significant increase in individual or cumulative occupational radiation exposure.

The proposed changes do not alter plant operating or surveillance procedures, and therefore will not change individual or cumulative occupational radiation exposure.

Based on the above, it is concluded that there will be no impact on the environment resulting from the proposed changes and the proposed changes meet the criteria specified in 10 CFR 51.22 for a categorical exclusion from the requirements of 10 CFR 51.21 relative to requiring a specific environmental assessment by the Commission. Additionally, implementation of the proposed changes will not adversely alter or affect the ALARA program or the Fire Protection Program.

**VI. CONCLUSION**

Based on the discussion above, the snubber operability, surveillance, and record, requirements can be relocated from the FitzPatrick TS to plant controlled documents. If snubber inoperability causes a TS system or component to be inoperable, then the affected system or component Limiting Condition for Operation (LCO) will be entered. The PORC and SRC have reviewed these proposed changes to the TS and have concluded that the changes do not involve an Unreviewed Safety Question, or a Significant Hazards Consideration as defined in 10 CFR 50.92, and do not endanger the health and safety of the public.

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**VII. REFERENCES**

1. NUREG-1433, Standard Technical Specifications, General Electric Plants, BWR/4, Revision 1, dated April 1995
2. NEDO-31466, Technical Specification Screening Criteria Application and Risk Assessment, dated November 1987
3. Code of Federal Regulations, Title 10, Part 50, Paragraph 50.36, Technical Specifications.



Attachment III to JPN-96-051

MARKUP OF TECHNICAL SPECIFICATION PAGES

(JPTS-96-001)

**NOTE 1:** Deletions are shown in ~~strikeout~~, and additions are in **bold**.

**NOTE 2:** Previous amendment revision bars are not shown.

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

Docket No. 50-333

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### 3.6—(cont'd)

#### 3.6.1—Shock Suppressors (Snubbers)

##### Applicability

Applies to the operational status of the shock suppressors (snubbers).

##### Objective

To assure the capability of the snubbers to:

Prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, and

Allow normal thermal motion during startup and shutdown.

##### Specification

1. During all modes of operation except Gold Shutdown and Refueling, all snubbers which are required to protect the primary coolant system or any other safety related system or component shall be operable. During Gold Shutdown or Refueling mode of operation, only those snubbers shall be operable which are on systems that are required to be operable in these modes.

### 4.6—(cont'd)

#### 4.6.1—Shock Suppressors (Snubbers)

##### Applicability

Applies to the periodic testing requirement for the shock suppressors (snubbers).

##### Objective

To assure the capability of the snubbers to perform their intended functions.

##### Specification

Each snubber shall be demonstrated operable by performance of the following augmented inservice inspection program:

1. All snubbers shall be categorized into two groups: those accessible and those inaccessible during reactor operation. The visual inspection interval for each category of snubbers shall be determined based upon the criteria provided in Table 4.6-1.

## 3.6 (cont'd)

2. With one or more snubbers inoperable, within 72 hours during normal operation, or within 7 days during Cold Shutdown or Refueling mode of operation for systems which are required to be operable in these modes, complete one of the following:
  - a. replace or restore the inoperable snubber(s) to operable status or;
  - b. declare the supported system inoperable and follow the appropriate limiting condition for operation statement for that system or;
  - c. perform an engineering evaluation to show the inoperable snubber is unnecessary to assure operability of the system or to meet the design criteria of the system, and remove the snubber from the system.
3. With one or more snubbers found inoperable, within 72 hours perform a visual inspection of the supported component(s) associated with the inoperable snubber(s) and document the results. For all modes of operation except Cold Shutdown and Refueling, within 14 days complete an engineering evaluation as per Specification 4.6.1.6 to ensure that the inoperable snubber(s) has not adversely affected the supported component(s). For Cold Shutdown or Refueling mode, this evaluation shall be completed within 30 days.

## 4.6 (cont'd)

2. Visual inspection shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movements 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 4.6.1.7 or 4.6.1.8, as applicable. Hydraulic snubbers which have lost sufficient fluid to potentially cause uncovering of the fluid reservoir to snubber valve assembly port or bottoming of the fluid reservoir piston with the snubber in the fully extended position shall be functionally tested to determine operability.
3. Once every 24 months, 10% of each type of snubbers shall be functionally tested for operability, either in place or in a bench test. For each unit and subsequent unit that does not meet the requirements of 4.6.1.7 or 4.6.1.8, an additional 10% of that type of snubber shall be functionally tested until no more failures are found, or all units have been tested.

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3.6 (cont'd)

4.6 (cont'd)

4. The representative sample selected for functionally 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 the following three categories:
  - a. The first snubber away from reactor vessel nozzle.
  - b. Snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.).
  - c. Snubbers within 10 feet of the discharge from a safety relief valve.

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.

## JAFNPP

3.6 (cont'd)

4.6 (cont'd)

5. — 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 and if due to manufacturer or design deficiency, 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.
6. — 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 components remain capable of meeting the designed service requirements.

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3.6 (cont'd)

4.6 (cont'd)

7. The hydraulic snubber functional test shall verify that:
  - a. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
  - b. Snubber bleed, or 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.
8. The mechanical snubber functional test shall verify that:
  - a. 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.
  - b. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

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### 3.6 (cont'd)

### 4.6 (cont'd)

- e. — 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.

### 9. — Snubber Service Life Monitoring

A record of the service life of each snubber, whose failure could adversely affect the primary coolant or other safety-related system, 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.B.13.

Once every 24 months, the installation and maintenance records for each snubber, whose failure could adversely affect the primary coolant or other safety-related system, 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.

## 3.6 and 4.6 BASES (cont'd)

H. (DELETED)

I. (DELETED)

Shock Suppressors

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 and 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. Snubbers excluded from this inspection program are those installed on non-safety related system 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. Because the snubber protection is required only during low probability events, a period of 72 hours (for normal operation) or 7 days (for cold shutdown or refueling mode of operation) is allowed for repairs or replacement of the snubber prior to taking any other action. Following the 72 hour (or 7 day) period, the supported system must be declared inoperable and the Limiting Condition of Operation statement for the supported system followed. As an alternative to snubber repair or replacement an engineering evaluation may be performed: to show that the inoperable snubber is unnecessary to assure operability of the system or to meet the design criteria of the system; and, to remove the snubber from the system. With one or more snubbers found inoperable, within 72 hours a visual inspection shall be performed on the

supported component(s) associated with the inoperable snubber(s) and the results shall be documented. For all modes of operation except Cold Shutdown and Refueling, within 14 days an engineering evaluation shall be performed to ensure that the inoperable snubber(s) has not adversely affected the supported component(s). For Cold Shutdown or refueling mode, this evaluation shall be completed within 30 days. A period of 7 days has been selected for repair or replacement of the inoperable snubber during cold shutdown or refueling mode of operation because in these modes the relative probability of structural damage to the piping systems would be lower due to lower values of total stresses on the piping systems. In case a shutdown is required, the allowance of 36 hours to reach a cold shutdown condition will permit an orderly shutdown consistent with standard operating procedures.

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. The inspections are performed for each category of snubbers. The snubbers are categorized by accessibility (i.e., accessible or inaccessible during reactor operation). The next visual inspection for each category may be twice, the same, or reduced by as much as two thirds of the previous inspection interval. This interval depends on the number of unacceptable snubbers found in proportion to the total number of snubbers



Table 4.6-1

Snubber Visual Inspection Interval

Population <sup>1,2</sup> Category	Number of Unacceptable Snubbers		
	Column A <sup>3</sup> Extended Interval	Column B <sup>4</sup> Repeat Interval	Column C <sup>5</sup> Reduce Interval
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25

Notes: 1. The next visual inspection interval for the population of a snubber category shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. This decision shall be made and documented before any inspection and used as the basis upon which to determine the next inspection interval for that category.

2. Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. The next lower integer for the value of the limit for Columns A, B, C shall be used if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.
3. If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.
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 4.6-1 (cont'd)

Snubber Visual Inspection Interval

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.

(B) The following records shall be retained for the duration of the Facility Operating License:

1. Records of any drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
2. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
3. Records of facility radiation and contamination surveys.
4. Records of radiation exposure for all individuals entering radiation control areas.
5. Records of gaseous and liquid radioactive material released to the environs.
6. Records of transient or operational cycles for those facility components identified in Table 6.10-1.
7. Records of training and qualification for current members of the plant staff.
8. Records of in-service inspections performed pursuant to these Technical Specifications.
9. Records of Quality Assurance activities required by the Quality Assurance Manual.
10. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
11. Records of meetings of the PORC and the SRC.
12. Records for Environmental Qualification which are covered under the provisions of paragraph 6.15.
13. **DELETED**  
~~Records of the service life of all hydraulic and mechanical snubbers, whose failure could adversely affect any safety-related system, including the date at which the service life commences and associated installation and maintenance records as of the effective date of this amendment.~~

#### 6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared and adhered to for all plant operations. These procedures shall be formulated to maintain radiation exposures received during operation and maintenance as far below the limits specified in 10 CFR 20 as practicable. The procedures shall include planning, preparation, and training for operation and maintenance activities. They shall also include exposure allocation, radiation and contamination control techniques, and final debriefing.

Attachment IV to JPN-96-051

James A. FitzPatrick Nuclear Power Plant

List of Commitments

Number	Commitment	Due Date
JPN-96-051-01	Relocate snubber operability, surveillance, and record requirements from the TS to plant controlled documents.	Ninety days (90) after TS amendment is issued by the NRC
JPN-96-051-02	Reference the plant controlled documents associated with this TS amendment in the FSAR.	First FSAR update due more than six months after NRC issues amendment.