

**From:** "Jack Spath" <jps@mailgate.nyserda.org>  
**To:** <pst@nrc.gov>  
**Date:** Thu, Nov 30, 2000 8:20 AM  
**Subject:** Nine Mile Point 1 and 2 charcoal TS amendments

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Subject: Nine Mile Point 1 and 2 charcoal TS amendments  
Author: <jdd08@health.state.ny.us > at Internet  
Date: 12/15/99 1:50 PM

I have just reviewed the proposed tech. spec. revisions to incorporate the NRC desired changes in the testing program for charcoal filters. I do not have a problem with the concept, however, there are a number of shortcomings in both applications.

I would like to be assured that these issues have been addressed and that the filters performance still meets that used in the applicable safety evaluation.

#### NMP 1

There is no discussion, or specification of air flow rate during testing. This has been specified in all other amendments I have reviewed, including NMP 2, and is conspicuous by it's absence.

There is no discussion of the basis for the acceptability of the proposed 95% acceptability criterion, or why it is changed from 90%.

#### NMP 2

There is no discussion of the basis for the acceptability for a penetration of .5% versus the previous requirement of .175%.

There is no real discussion of why it is acceptable to delete the SRs for the Control Room Outdoor Air Special Filter Train System heaters.

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**Creation Date:** Thu, Nov 30, 2000 8:18 AM  
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