

March 21, 2001

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

**Subject: Docket Nos. 50-361 and 50-362  
Proposed Technical Specification Change Number NPF-10/15-519  
Ventilation Filter Testing Program Clarification  
San Onofre Nuclear Generating Station Units 2 and 3**

Gentlemen:

Enclosed are Amendment Application Number 202 to Facility Operating License NPF-10, and Amendment Application Number 187 to Facility Operating License NPF-15, for the San Onofre Nuclear Generating Station, Units 2 and 3, respectively. The Amendment Applications together comprise Proposed Technical Specification (TS) Change Number (PCN) 519.

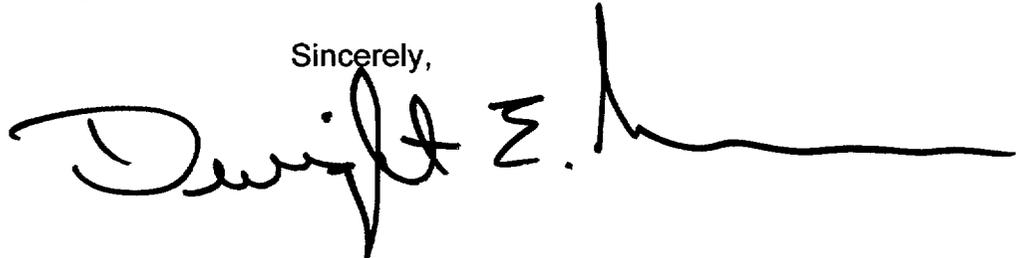
PCN-519 is a request to revise TS 5.5.2.12, "Ventilation Filter Testing Program (VFTP)". Specifically, the Proposed Change would change the reference to the ASME Code from ASME N510-1989 to ANSI N510-1975. This change is requested to ensure the clarity of the methodology used to test the Control Room Emergency Air Cleanup System and Post-Accident Cleanup Filter System High Efficiency Particulate Air (HEPA) filters. Although the test methodology is slightly different than that in N510-1989, the acceptance criteria are the same and the current methodology is conservative.

Also, in subsection 5.5.2.12.d the references to Regulatory Guide (RG) 1.52, Revision 2, and ASME N510-1989 will be deleted. This section is concerned with pressure drop testing across HEPA filters. RG 1.52, Revision 2, and ASME N510-1989 do not require pressure drop testing of HEPA filters.

Southern California Edison requests these amendments be issued effective as of the date of issuance, to be implemented within 30 days from the date of issuance.

If you have any questions regarding these amendment applications, please contact me or Mr. Jack L. Rainsberry at (949) 368-7420.

Sincerely,

A handwritten signature in black ink, appearing to read "Dwight E. H.", with a long horizontal flourish extending to the right.

Enclosures

cc:

E. W. Merschoff, Regional Administrator, NRC Region IV  
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 and 3  
L. Raghavan, NRC Project Manager, San Onofre Units 2 and 3  
S. Y. Hsu, Department of Health Services, Radiologic Health Branch

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN, CALIFORNIA EDISON COMPANY, ET AL. for a class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 3 of the San Onofre Nuclear Generating Station

Docket No. 50-362  
Amendment Application  
No. 187

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10CFR50.90, hereby submit Amendment Application No. 187. This amendment application consists of Proposed Change No. 519 to Facility Operating License NPF-15. PCN-519 is a request to revise Technical Specification (TS) 5.5.2.12, "Ventilation Filter Testing Program (VFTP)."

Subscribed on this 21st day of March, 2001.

Respectfully Submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Dwight E. Nunn  
Dwight E. Nunn  
Vice President  
Engineering and Technical Services

State of California  
County of San Diego

On 3/21/2001 before me, Mariane Sanchez

personally appeared Dwight E. Nunn, personally known to me (~~or proved to me on the basis of satisfactory evidence~~) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/~~she/they~~ executed the same in his/~~her/their~~ authorized capacity(ies), and that by his/~~her/their~~ signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature Mariane Sanchez



UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN, CALIFORNIA EDISON COMPANY, ET AL. for a class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 2 of the San Onofre Nuclear Generating Station

Docket No. 50-361  
Amendment Application  
No. 202

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10CFR50.90, hereby submit Amendment Application No. 202. This amendment application consists of Proposed Change No. PCN-519 to Facility Operating License NPF-10. PCN-519 is a request to revise Technical Specification (TS) 5.5.2.12, "Ventilation Filter Testing Program (VFTP)."

Subscribed on this 21st day of March, 2001.

Respectfully Submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Dwight E. Nunn  
Dwight E. Nunn  
Vice President  
Engineering and Technical Services

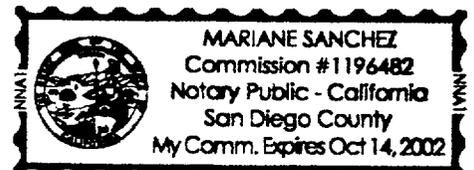
State of California  
County of San Diego

On 3/21/2001 before me, Mariane Sanchez

personally appeared Dwight E. Nunn, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature Mariane Sanchez



## **DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES NPF-10/15-519**

The purpose of this request is to revise the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 Technical Specifications (TSs), Section 5.5.2.12, "Ventilation Filter Testing Program (VFTP)". The proposed change will modify the reference to ASME Code in the first paragraph of Section 5.5.2.12 and in subsections 5.5.2.12.a and 5.5.2.12.b. Specifically, the proposed change will change the reference to the ASME Code from ASME N510-1989 to ANSI N510-1975. This change is requested to ensure clarity of the methodology used to test Control Room Emergency Air Cleanup System (CREACUS) and Post-Accident Cleanup Filter System (PACU) High Efficiency Particulate Air (HEPA) filters. Although the test methodology is slightly different than that in ASME N510-1989, the acceptance criteria are the same and the current methodology is conservative. Also, the reference to Regulatory Guide (RG) 1.52, Revision 2, and ASME N510-1989 in subsection 5.5.2.12.d will be deleted. RG 1.5.2, Revision 2, and ASME N510-1989 do not address pressure drop testing.

### **Existing Technical Specifications**

Unit 2: See Attachment "A"

Unit 3: See Attachment "B"

### **Proposed Technical Specifications**

Unit 2: See Attachment "C" (Redline and Strikeout)

Unit 3: See Attachment "D" (Redline and Strikeout)

### **Proposed Technical Specifications**

Unit 2: See Attachment "E"

Unit 3: See Attachment "F"

### **Proposed Bases** (Not applicable)

### **DESCRIPTION**

The purpose of this request is to revise the SONGS Units 2 and 3 TSs, Section 5.5.2.12, "Ventilation Filter Testing Program (VFTP)". The proposed change will modify the reference to ASME Code in subsections 5.5.2.12.a and 5.5.12.b. Specifically, the proposed change would change the reference to the ASME Code from ASME N510-1989 to ANSI N510-1975. This change is requested to ensure clarity of the methodology used to test CREACUS and PACU HEPA filters. Although the test methodology is slightly

different than that in ASME N510-1989, the acceptance criteria are the same and the current methodology is conservative. Also, the reference to RG 1.52, Revision 2, and ASME N510-1989 in subsection 5.5.2.12.d will be deleted. RG 1.5.2, Revision 2, and ASME N510-1989 do not address pressure drop testing. The reference to ASME N510-1989 in the first paragraph of Section 5.5.2.12 will be changed to ANSI N510-1975.

## **DISCUSSION:**

Technical Specification (TS) 3.7.11, "Control Room Emergency Air Cleanup System (CREACUS)" Surveillance Requirement (SR) 3.7.11.2 and TS 3.7.14, "Fuel Handling Building Post-Accident Cleanup Filter System (PACU)," SR 3.7.14.2 require CREACUS and PACU filter testing "in accordance with the Ventilation Filter Testing Program (VFTP)." The requirement to have a VFTP is established in TS 5.5.2.12, "Ventilation Filter Testing Program (VFTP)."

TS 5.5.2.12 indicates that certain aspects of the filter testing shall be in accordance with Regulatory Guide RG 1.52, Revision 2 and ASME N510-1989. In particular section 5.5.2.12.a states:

"Inplace testing of the high efficiency particulate air (HEPA) filters to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989; and,"

TS 5.5.2.12.b states:

"Inplace testing of the charcoal adsorber to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989; and..."

and TS 5.5.2.12.d states:

"Testing to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, when tested at the appropriate system flowrate, is acceptable in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989."

This VFTP is documented in SONGS Units 2 and 3 procedure SO23-V-9.

As described in SO23-V-9, Revision 1, section 6.3.1, the CREACUS units' HEPA filters are currently tested to N510-1975. The VFTP Dioctyle Phtalate (DOP) lead test methodology satisfies the requirements of ANSI N510-1975, which was the current standard during plant construction. During that era of DOP testing, the DOP generator flow rates were lower than can be achieved today, thus requiring the use of the Alternate Shroud Method for large flow rate units such as the CREACUS. Accordingly, the HEPA filters were tested using the Alternate Shroud Method (a.k.a. "Shroud Method") for testing individual filters or groups of filters, as permitted by ANSI N510-1975, Section 10.6.

Due to advances in DOP generator technology, beginning in 1980, the Shroud Method was omitted from ASME/ANSI N510-1975 since it was no longer necessary, as the high DOP generation rates needed for high flow rate units had become available. However, SONGS has continued to use the more conservative ANSI N510-1975 standard, which tests individual filters (or groups of filters), as opposed to testing the entire bank permitted by the ASME N510-1989 standard. As both methods use the same acceptance criteria, the 1975 standard is actually more conservative. That is, if all the filters in the bank pass the 0.05% acceptance criterion, the entire bank is therefore going to pass the 0.05% criterion as well.

Section 10 of ANSI N510-1975 provides the HEPA testing method for acceptance and surveillance tests. The downstream sample point should be a representative single sample point. If a single downstream sample is not achievable, then the Multiple Sampling Technique (Section 11) should be used. An Alternate Shroud Test is also included in this section. It can be used provided that a satisfactory housing leak test and frame leak test have been made. The Alternate Shroud Test tests each filter or group of filters individually rather than the entire bank.

Section 10 of ASME N510-1989 provides the methodology to test a HEPA filter bank. The single point downstream sample points shall be downstream of a fan, or downstream sample manifolds shall be qualified per ASME N509. This section of the 1989 standard does not have the "Alternate Shroud Test."

There are two reasons to continue using the 1975 standard:

First, testing the entire bank would require performing an Air-Aerosol Mixing Uniformity Test, which is unnecessary if individual filters are tested.

Second, deviating from the 1975 standard would require procedure changes and retraining of staff.

The PACU units were qualified to and are tested to ANSI N510-1975. The original startup tests used the methodology outlined in ANSI N510-1975 to qualify the current test method. In particular, the PACU in-place HEPA filter testing methodology employed at SONGS has a downstream sampling point location which differs from the location suggested in ASME N510-1989. ASME N510-1989 specifies new methods of doing the testing. These new methods would require installation of new equipment and qualification of new test points which are currently not part of the SONGS design. While the testing is currently performed per the 1975 version of ANSI N510, the results satisfy the scope and intent of the 1989 version of this Code.

The proposed change will modify the version of ANSI Code N510 from 1989 to 1975 in subsections 5.5.2.12.a and 5.5.2.12.b to reflect the established plant practice in testing HEPA filters for CREACUS and PACU units.

Section 5.5.2.12.d will be modified by deleting the references to RG 1.52, Revision 2, and ASME N510-1989. There are no requirements for pressure drop test across combined HEPA filters, the prefilters, and the charcoal adsorbers in RG 1.52, Revision 2, and ASME N510-1989. The proposed version of section 5.5.2.12.d reads:

“Testing to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, when tested at the appropriate system flowrate.”

#### **NO SIGNIFICANT HAZARDS CONSIDERATION:**

The Commission has provided standards for determining whether a significant hazards consideration exists as stated in 10CFR50.92. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with a proposed amendment would not: (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) Involve a significant reduction in a margin of safety. A discussion of these standards as they relate to this amendment request follows.

- (1) Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change is to change the reference to ASME Code in subsections 5.5.2.12.a and 5.5.2.12.b from ASME N510-1989 to ASME N510-1975. Technical Specification (TS) 3.7.11, “Control Room Emergency Air Cleanup System (CREACUS)” Surveillance Requirement (SR) 3.7.11.2 and TS 3.7.14, “Fuel Handling Building Post-Accident Cleanup Filter System (PACU),” SR 3.7.14.2 require CREACUS and PACU filter testing “in accordance with the Ventilation Filter Testing Program (VFTP).”

San Onofre Nuclear Generating Station (SONGS) TS 5.5.2.12.a, “Ventilation Filter Testing Program,” states that the in-place HEPA filter testing is performed in accordance with Regulatory Guide (RG) 1.52, Revision 2 and ASME N510-1989. However, the CREACUS in-place HEPA filter testing uses a method (“Alternate Shroud Test”) which is no longer specified in ASME N510-1989. But this method is specified in ANSI N510-1975 and was used when the plant was licensed. In addition, the PACU in-place HEPA filter testing methodology which is employed at SONGS has a downstream point location which differs from the location suggested in ASME N510-1989. ANSI N510-1975, while providing a suggestion where downstream sample could be located, nevertheless does not provide a specific location. The test acceptance criteria are the same for methods cited in ANSI N510-1975 and ASME N510-1989. The method which is employed at SONGS provides more conservative results because the test is performed on individual HEPA filters, which ensures that each of the HEPA filters in the tested bank meets the

acceptance criteria.

The locations of the PACU HEPA downstream sample points are different from the location suggested in ASME N510-1989, though they meet the requirements delineated in ANSI N510-1975. ANSI N510-1975 requires that a single representative downstream sample point be established, if possible, at the location where adequate mixing may be achieved, or at a point downstream of a fan, or multiple downstream sampling points may be used (such as in the Alternate Shroud Technique used in the CREACUS system) if a single downstream sample point is not feasible.

Since the HEPA filters are tested to the same acceptance criteria, and the testing methodology is permitted by ANSI N510-1975, to which the plant is licensed, it is concluded that the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Section 5.5.12.d will be modified by the proposed change by deleting the references to RG 1.52, Revision 2 and ASME N510-1989. There are no requirements for pressure drop test across combined HEPA filters, the prefilters, and the charcoal adsorbers in RG 1.52, Revision 2, and ASME N510-1989. The proposed version of section 5.5.2.12.d reads:

“Testing to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, when tested at the appropriate system flowrate.”

The proposed change clarifies the statement of section 5.5.2.12.d. Pressure drop testing across combined HEPA filters, the prefilters, and the charcoal adsorbers is industry-wide practice which is based on good engineering practice and operating experience.

Therefore, the probability or consequences of an accident previously evaluated will not be increased by operating the facility in accordance with this proposed change.

- (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 does not change the design or configuration of the plant. The proposed change is to change the reference to ASME Code in subsection 5.5.2.12.a and 5.5.2.12.b from ASME N510-1989 to ANSI N510-1975 to more clearly reflect the standard used. Also, subsection 5.5.2.12.d will be changed by deleting the references to RG 1.52, Revision 2, and ASME N510-1989 regarding pressure drop test across HEPA filters. RG 1.52, Revision 2, and ASME N510-1989 do not require pressure drop test across HEPA filters.

Therefore, this proposed change will not create the possibility of a new or different kind of accident from any accident that has been 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 proposed change is to change the reference to the ASME Code in subsections 5.5.2.12.a and 5.5.2.12.b from ASME N510-1989 to ANSI N510-1975. The CREACUS units' HEPA filters are currently tested to ANSI N510-1975. Although the test methodology is slightly different than that in ASME N510-1989, the acceptance criteria are the same and the current methodology is conservative. Thus the current testing satisfies the acceptance criteria of ASME N510-1989, even though the test method is different.

The current methodology for HEPA filter testing will not change as a result of the proposed change. Also, deletion of reference to RG 1.52, Revision 2, and ASME N510-1989 from subsection 5.5.2.12.d clarifies this section because these standards do not require HEPA filters pressure drop test. Consequently, there is no change to the design or operation of the plant as a result of this change.

Therefore, operation of the facility in accordance with this proposed change will not involve a significant reduction in a margin of safety.

#### ENVIRONMENTAL CONSIDERATION:

SCE has determined that the proposed amendment involves no changes in the amount or type of effluent that may be released offsite, and results in no increase in individual or cumulative occupational radiation exposure. As described above, the proposed TS amendment involves no significant hazards consideration and, as such, meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9).

**ATTACHMENT A**  
**SAN ONOFRE NUCLEAR GENERATION STATION**  
**PROPOSED CHANGE NUMBER 519**  
**EXISTING TECHNICAL SPECIFICATIONS**  
**UNIT 2**

5.5 Procedures, Programs, and Manuals (continued)

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5.5.2.11 Steam Generator Tube Surveillance Program (continued)

5.5.2.11.1 The inservice inspection may be limited to one SG on a rotating schedule encompassing 6% of the tubes if the results of the first or previous inspections indicate that all SGs are performing in a like manner. Note that under some circumstances, the operating conditions in one SG may be found to be more severe than those in the other SG. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

5.5.2.11.2 The other SG not inspected during the first inservice inspection shall be inspected. The third and subsequent inspections should follow the instructions described in Specification 5.5.2.11.1 above.

5.5.2.12 Ventilation Filter Testing Program (VFTP)

This Program establishes the required testing of the Engineered Safety Feature filter ventilation systems, "Control Room Emergency Air Cleanup System" and "Fuel Handling Building Post-accident Cleanup Filter System," in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989. The frequency of testing shall be in accordance with Regulatory Guide 1.52, Revision 2. As a minimum the VFTP program shall include the following:

- a. Inplace testing of the high efficiency particulate air (HEPA) filters to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989; and
- b. Inplace testing of the charcoal adsorber to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989; and
- c. Laboratory testing of charcoal adsorber samples obtained in accordance with Regulatory Guide 1.52, Revision 2 and tested at the appropriate temperature and relative humidity in accordance with ASTM D3803-1989 to show acceptable methyl iodide penetration; and
- d. Testing to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, when tested at the appropriate system flowrate, is acceptable in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989.

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**ATTACHMENT B**  
**SAN ONOFRE NUCLEAR GENERATION STATION**  
**PROPOSED CHANGE NUMBER 519**  
**EXISTING TECHNICAL SPECIFICATIONS**  
**UNIT 3**

5.5 Procedures, Programs, and Manuals (continued)

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5.5.2.11 Steam Generator (SG) Tube Surveillance Program (continued)

5.5.2.11.1 The inservice inspection may be limited to one SG on a rotating schedule encompassing 6% of the tubes if the results of the first or previous inspections indicate that all SGs are performing in a like manner. Note that under some circumstances, the operating conditions in one SG may be found to be more severe than those in the other SG. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

5.5.2.11.2 The other SG not inspected during the first inservice inspection shall be inspected. The third and subsequent inspections should follow the instructions described in Specification 5.5.2.11.1 above.

5.5.2.12 Ventilation Filter Testing Program (VFTP)

This Program establishes the required testing of the Engineered Safety Feature filter ventilation systems, "Control Room Emergency Air Cleanup System" and "Fuel Handling Building Post-accident Cleanup Filter System," in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989. The frequency of testing shall be in accordance with Regulatory Guide 1.52, Revision 2. As a minimum the VFTP program shall include the following:

- a. Inplace testing of the high efficiency particulate air (HEPA) filters to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989; and
- b. Inplace testing of the charcoal adsorber to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989; and
- c. Laboratory testing of charcoal adsorber samples obtained in accordance with Regulatory Guide 1.52, Revision 2 and tested at the appropriate temperature and relative humidity in accordance with ASTM D3803-1989 to show acceptable methyl iodide penetration; and
- d. Testing to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, when tested at the appropriate system flowrate, is acceptable in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989.

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**ATTACHMENT C**  
**SAN ONOFRE NUCLEAR GENERATION STATION**  
**PROPOSED CHANGE NUMBER 519**  
**PROPOSED TECHNICAL SPECIFICATIONS**  
**(Redline and Strikeout)**  
**UNIT 2**

5.5 Procedures, Programs, and Manuals (continued)

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5.5.2.11 Steam Generator Tube Surveillance Program (continued)

5.5.2.11.1 The inservice inspection may be limited to one SG on a rotating schedule encompassing 6% of the tubes if the results of the first or previous inspections indicate that all SGs are performing in a like manner. Note that under some circumstances, the operating conditions in one SG may be found to be more severe than those in the other SG. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

5.5.2.11.2 The other SG not inspected during the first inservice inspection shall be inspected. The third and subsequent inspections should follow the instructions described in Specification 5.5.2.11.1 above.

5.5.2.12 Ventilation Filter Testing Program (VFTP)

This Program establishes the required testing of the Engineered Safety Feature filter ventilation systems, "Control Room Emergency Air Cleanup System" and "Fuel Handling Building Post-accident Cleanup Filter System," in accordance with Regulatory Guide 1.52, Revision 2, and ~~ASME ANSI N510-1989-1975~~. The frequency of testing shall be in accordance with Regulatory Guide 1.52, Revision 2. As a minimum the VFTP program shall include the following:

- a. Inplace testing of the high efficiency particulate air (HEPA) filters to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ~~ASME ANSI N510-1989-1975~~; and
- b. Inplace testing of the charcoal adsorber to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ~~ASME ANSI N510-1989-1975~~; and
- c. Laboratory testing of charcoal adsorber samples obtained in accordance with Regulatory Guide 1.52, Revision 2 and tested at the appropriate temperature and relative humidity in accordance with ASTM D3803-1989 to show acceptable methyl iodide penetration; and
- d. Testing to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, when tested at the appropriate system flowrate, is acceptable ~~in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989.~~

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**ATTACHMENT D**  
**SAN ONOFRE NUCLEAR GENERATION STATION**  
**PROPOSED CHANGE NUMBER 519**  
**PROPOSED TECHNICAL SPECIFICATIONS**  
**(Redline and Strikeout)**  
**UNIT 3**

5.5 Procedures, Programs, and Manuals (continued)

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5.5.2.11 Steam Generator (SG) Tube Surveillance Program (continued)

5.5.2.11.1 The inservice inspection may be limited to one SG on a rotating schedule encompassing 6% of the tubes if the results of the first or previous inspections indicate that all SGs are performing in a like manner. Note that under some circumstances, the operating conditions in one SG may be found to be more severe than those in the other SG. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

5.5.2.11.2 The other SG not inspected during the first inservice inspection shall be inspected. The third and subsequent inspections should follow the instructions described in Specification 5.5.2.11.1 above.

5.5.2.12 Ventilation Filter Testing Program (VFTP)

This Program establishes the required testing of the Engineered Safety Feature filter ventilation systems, "Control Room Emergency Air Cleanup System" and "Fuel Handling Building Post-accident Cleanup Filter System," in accordance with Regulatory Guide 1.52, Revision 2, and ASME ~~ANSI N510-1989-1975~~. The frequency of testing shall be in accordance with Regulatory Guide 1.52, Revision 2. As a minimum the VFTP program shall include the following:

- a. Inplace testing of the high efficiency particulate air (HEPA) filters to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ASME ~~ANSI N510-1989-1975~~; and
- b. Inplace testing of the charcoal adsorber to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ASME ~~ANSI N510-1989-1975~~; and
- c. Laboratory testing of charcoal adsorber samples obtained in accordance with Regulatory Guide 1.52, Revision 2 and tested at the appropriate temperature and relative humidity in accordance with ASTM D3803-1989 to show acceptable methyl iodide penetration; and
- d. Testing to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, when tested at the appropriate system flowrate, is acceptable in accordance with Regulatory Guide 1.52, Revision 2, and ASME ~~N510-1989~~.

(continued)

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**ATTACHMENT E**  
**SAN ONOFRE NUCLEAR GENERATION STATION**  
**PROPOSED CHANGE NUMBER 519**  
**PROPOSED TECHNICAL SPECIFICATIONS**  
**UNIT 2**

5.5 Procedures, Programs, and Manuals (continued)

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5.5.2.11 Steam Generator Tube Surveillance Program (continued)

5.5.2.11.1 The inservice inspection may be limited to one SG on a rotating schedule encompassing 6% of the tubes if the results of the first or previous inspections indicate that all SGs are performing in a like manner. Note that under some circumstances, the operating conditions in one SG may be found to be more severe than those in the other SG. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

5.5.2.11.2 The other SG not inspected during the first inservice inspection shall be inspected. The third and subsequent inspections should follow the instructions described in Specification 5.5.2.11.1 above.

5.5.2.12 Ventilation Filter Testing Program (VFTP)

This Program establishes the required testing of the Engineered Safety Feature filter ventilation systems, "Control Room Emergency Air Cleanup System" and "Fuel Handling Building Post-accident Cleanup Filter System," in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975. The frequency of testing shall be in accordance with Regulatory Guide 1.52, Revision 2. As a minimum the VFTP program shall include the following:

- a. Inplace testing of the high efficiency particulate air (HEPA) filters to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975; and
- b. Inplace testing of the charcoal adsorber to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975; and
- c. Laboratory testing of charcoal adsorber samples obtained in accordance with Regulatory Guide 1.52, Revision 2 and tested at the appropriate temperature and relative humidity in accordance with ASTM D3803-1989 to show acceptable methyl iodide penetration; and
- d. Testing to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, when tested at the appropriate system flowrate, is acceptable.

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**ATTACHMENT F**  
**SAN ONOFRE NUCLEAR GENERATION STATION**  
**PROPOSED CHANGE NUMBER 519**  
**PROPOSED TECHNICAL SPECIFICATIONS**  
**UNIT 3**

5.5 Procedures, Programs, and Manuals (continued)

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5.5.2.11 Steam Generator (SG) Tube Surveillance Program (continued)

5.5.2.11.1 The inservice inspection may be limited to one SG on a rotating schedule encompassing 6% of the tubes if the results of the first or previous inspections indicate that all SGs are performing in a like manner. Note that under some circumstances, the operating conditions in one SG may be found to be more severe than those in the other SG. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

5.5.2.11.2 The other SG not inspected during the first inservice inspection shall be inspected. The third and subsequent inspections should follow the instructions described in Specification 5.5.2.11.1 above.

5.5.2.12 Ventilation Filter Testing Program (VFTP)

This Program establishes the required testing of the Engineered Safety Feature filter ventilation systems, "Control Room Emergency Air Cleanup System" and "Fuel Handling Building Post-accident Cleanup Filter System," in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975. The frequency of testing shall be in accordance with Regulatory Guide 1.52, Revision 2. As a minimum the VFTP program shall include the following:

- a. Inplace testing of the high efficiency particulate air (HEPA) filters to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975; and
- b. Inplace testing of the charcoal adsorber to demonstrate acceptable penetration and system bypass when tested at the appropriate system flowrate in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975; and
- c. Laboratory testing of charcoal adsorber samples obtained in accordance with Regulatory Guide 1.52, Revision 2 and tested at the appropriate temperature and relative humidity in accordance with ASTM D3803-1989 to show acceptable methyl iodide penetration; and
- d. Testing to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, when tested at the appropriate system flowrate, is acceptable.

(continued)