

March 23, 1995

Mr. Donald A. Reid, Vice President  
Operations  
Vermont Yankee Nuclear Power Corporation  
Ferry Road  
Brattleboro, VT 05301

DISTRIBUTION:

Docket File	JLinville, RI
PUBLIC	OGC 15B18
PDI-3 Reading	GHill (2) T-5C3
SVarga	CGrimes - 11F23
JZwolinski	ACRS (4)
PMcKee	OPA - 2G5
SNorris	OC/LFDCB
DDorman	CMcCracken

SUBJECT: ISSUANCE OF AMENDMENT (TAC NO. M91106)

Dear Mr. Reid

The Commission has issued the enclosed Amendment No. 143 to Facility Operating License No. DPR-28 for the Vermont Yankee Nuclear Power Station, in response to your application dated December 8, 1994, as supplemented by letter dated February 16, 1995.

The amendment revises Specifications 3.7.B and 4.7.B to clarify alternate power source requirements for the standby gas treatment system (SGTS) during refueling operation, clarify test requirements for the SGTS and incorporate related changes to the Bases.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register Notice.

Sincerely,

Original signed by Ronald W. Hernan

for: Daniel H. Dorman, Project Manager  
Project Directorate I-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosures: 1. Amendment No. 143 to DPR-28  
2. Safety Evaluation

cc w/encls: See next page

DOCUMENT NAME: B:\VY91106.AMD

OFFICE	PDI-3:LA	PDI-3:PM	NRR/SPLB	OGC	D:PDI-3
NAME	SNorris	DDorman:mw	CMcCracken		PMcKee
DATE	3/13/95	3/13/95	3/15/95	3/15/95	3/23/95

9503290320 950323  
PDR ADOCK 05000271  
P PDR

OFFICIAL RECORD COPY

280046

FILE CENTER COPY

*CP-1*  
*DFD*

March 23, 1995

Mr. Donald A. Reid, Vice President  
Operations  
Vermont Yankee Nuclear Power Corporation  
Ferry Road  
Brattleboro, VT 05301

DISTRIBUTION:

Docket File	JLinville, RI
PUBLIC	OGC 15B18
PDI-3 Reading	GHill (2) T-5C3
SVarga	CGrimes - 11F23
JZwolinski	ACRS (4)
PMcKee	OPA - 2G5
SNorris	OC/LFDCB
DDorman	CMcCracken

SUBJECT: ISSUANCE OF AMENDMENT (TAC NO. M91106)

Dear Mr. Reid

The Commission has issued the enclosed Amendment No. 143 to Facility Operating License No. DPR-28 for the Vermont Yankee Nuclear Power Station, in response to your application dated December 8, 1994, as supplemented by letter dated February 16, 1995.

The amendment revises Specifications 3.7.B and 4.7.B to clarify alternate power source requirements for the standby gas treatment system (SGTS) during refueling operation, clarify test requirements for the SGTS and incorporate related changes to the Bases.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register Notice.

Sincerely,

Original signed by Ronald W. Hernan

for: Daniel H. Dorman, Project Manager  
Project Directorate I-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosures: 1. Amendment No. 143 to DPR-28  
2. Safety Evaluation

cc w/encls: See next page

DOCUMENT NAME: B:\VY91106.AMD

OFFICE	PDI-3:LA	PDI-3:PM	NRR/SPLB	OGC	D:PDI-3
NAME	SNorris	DDorman:mw	CMcCracken		PMcKee
DATE	3/13/95	3/13/95	3/15/95	3/15/95	3/23/95

OFFICIAL RECORD COPY



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

March 23, 1995

Mr. Donald A. Reid, Vice President  
Operations  
Vermont Yankee Nuclear Power Corporation  
Ferry Road  
Brattleboro, VT 05301

SUBJECT: ISSUANCE OF AMENDMENT (TAC NO. M91106)

Dear Mr. Reid:

The Commission has issued the enclosed Amendment No. 143 to Facility Operating License No. DPR-28 for the Vermont Yankee Nuclear Power Station, in response to your application dated December 8, 1994, as supplemented by letter dated February 16, 1995.

The amendment revises Specifications 3.7.B and 4.7.B to clarify alternate power source requirements for the standby gas treatment system (SGTS) during refueling operation, clarify test requirements for the SGTS and incorporate related changes to the Bases.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register Notice.

Sincerely,

A handwritten signature in cursive script that reads "Daniel H. Dorman for".

Daniel H. Dorman, Project Manager  
Project Directorate I-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosures: 1. Amendment No. 143 to DPR-28  
2. Safety Evaluation

cc w/encls: See next page

Donald A. Reid, Vice President  
Operations

Vermont Yankee Nuclear Power Station

cc:

Mr. Jay Thayer, Vice President  
Yankee Atomic Electric Company  
580 Main Street  
Bolton, MA 01740-1398

G. Dana Bisbee, Esq.  
Office of the Attorney General  
Environmental Protection Bureau  
State House Annex  
25 Capitol Street  
Concord, NH 03301-6937

Regional Administrator, Region I  
U. S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Resident Inspector  
Vermont Yankee Nuclear Power Station  
U.S. Nuclear Regulatory Commission  
P. O. Box 176  
Vernon, VT 05354

R. K. Gad, III  
Ropes & Gray  
One International Place  
Boston, MA 02110-2624

Chief, Safety Unit  
Office of the Attorney General  
One Ashburton Place, 19th Floor  
Boston, MA 02108

Mr. Richard P. Sedano, Commissioner  
Vermont Department of Public Service  
120 State Street, 3rd Floor  
Montpelier, VT 05602

Mr. David Rodham, Director  
Massachusetts Civil Defense Agency  
400 Worcester Rd.  
P.O. Box 1496  
Framingham, MA 01701-0317  
ATTN: James Muckerheide

Public Service Board  
State of Vermont  
120 State Street  
Montpelier, VT 05602

Chairman, Board of Selectmen  
Town of Vernon  
Post Office Box 116  
Vernon, VT 05354-0116

Mr. Raymond N. McCandless  
Vermont Division of Occupational  
and Radiological Health  
Administration Building  
Montpelier, VT 05602

Mr. J. P. Pelletier, Vice President  
Vermont Yankee Nuclear Power  
Corporation  
Ferry Road  
Brattleboro, VT 05301

Mr. L. A. Tremblay  
Senior Licensing Engineer  
Vermont Yankee Nuclear Power  
Corporation  
580 Main Street  
Bolton, MA 01740-1398

Mr. Robert J. Wanczyk, Plant Manager  
Vermont Yankee Nuclear Power Station  
P.O. Box 157, Governor Hunt Road  
Vernon, VT 05354



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

VERMONT YANKEE NUCLEAR POWER CORPORATION

DOCKET NO. 50-271

VERMONT YANKEE NUCLEAR POWER STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 143  
License No. DPR-28

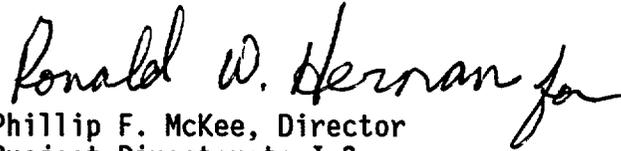
1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment filed by the Vermont Yankee Nuclear Power Corporation (the licensee) dated December 16, 1994, as supplemented by letter dated February 15, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-28 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 143, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Phillip F. McKee, Director  
Project Directorate I-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: March 23, 1995

ATTACHMENT TO LICENSE AMENDMENT NO.143

FACILITY OPERATING LICENSE NO. DPR-28

DOCKET NO. 50-271

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change.

<u>Remove</u>	<u>Insert</u>
152	152
153	153
154	154
166	166
---	166a

### 3.7 LIMITING CONDITIONS FOR OPERATION

ΔP is reduced to <1.7) during required operability testing of the HPCI system pump, the RCIC system pump, the drywell-suppression chamber vacuum breakers, and the suppression chamber-reactor building vacuum breakers, and SGTS testing.

- d. If the specifications of 3.7.A.9.a cannot be met, and the differential pressure cannot be restored within the subsequent six (6) hour period, an orderly shutdown shall be initiated and the reactor shall be in a Hot Shutdown condition in six (6) hours and a Cold Shutdown condition in the following eighteen (18) hours.

#### B. Standby Gas Treatment System

1. a. Except as specified in Specification 3.7.B.3.a below, whenever the reactor is in Run Mode or Startup Mode, both circuits of the Standby Gas Treatment System shall be operable at all times when secondary containment integrity is required.
- b. Except as specified in Specification 3.7.B.3.b below, whenever the reactor is in Refuel Mode, both circuits of the Standby Gas

### 4.7 SURVEILLANCE REQUIREMENTS

#### B. Standby Gas Treatment System

1. At least once per operating cycle, not to exceed 18 months, the following conditions shall be demonstrated.
  - a. Pressure drop across the combined HEPA and charcoal filter banks is less than 6 inches of water at 1500 cfm ±10%.
  - b. Inlet heater input is at least 9 kW.

### 3.7 LIMITING CONDITIONS FOR OPERATION

- Treatment System and an alternate electrical power source, consisting of the associated Emergency Diesel Generator or Vernon tie, for each standby gas treatment circuit shall be operable at all times when secondary containment integrity is required.
2. a. The results of the in-place cold DOP and halogenated hydrocarbon tests at design flows on HEPA and charcoal filter banks shall show  $\geq 99\%$  DOP removal and  $\geq 99\%$  halogenated hydrocarbon removal.
  - b. The results of laboratory carbon sample analysis shall show  $\geq 95\%$  radioactive methyl iodide removal. (130°C, 95% RH). Laboratory analysis results shall be verified acceptable within 31 days following sample removal or the applicable train of the Standby Gas Treatment System shall be considered in-operable and the requirements of Specification 3.7.B.3 shall apply.
  - c. System fans shall be shown to operate within  $\pm 10\%$  of design flow.

### 4.7 SURVEILLANCE REQUIREMENTS

2. a. The tests and sample analysis of Specification 3.7.B.2 shall be performed initially and at least once per operating cycle not to exceed 18 months, and following painting, fire or chemical release in any ventilation zone communicating with the system, while the system is operating, that could contaminate the HEPA filters or charcoal adsorbers.
- b. Cold DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank.
- c. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of the charcoal filter bank.  
  
In addition, the sample analysis of Specification 3.7.B.2.b and the halogenated hydrocarbon test shall be performed after every 720 hours of normal system operation.
- d. Each circuit shall be operated with the heaters on at least 10 hours every month.
- e. An ultrasonic leak test shall be performed on the gaskets sealing the housing panels downstream of the HEPA filters and adsorbers at least

### 3.7 LIMITING CONDITIONS FOR OPERATION

3. a. From and after the date that one circuit of the Standby Gas Treatment System is made or found to be inoperable for any reason, reactor operation is permissible only during the succeeding seven days unless such circuit is sooner made operable, provided that during such seven days all active components of the other standby gas treatment circuit shall be operable.
3. b. From and after the date that one circuit of the Standby Gas Treatment System is made or found to be inoperable for any reason, operations requiring secondary containment are permissible only during the succeeding seven days unless such circuit is sooner made operable, provided that during such seven days all active components, including the associated Emergency Diesel Generator of the other standby gas treatment circuit shall be operable.
4. If this condition cannot be met, procedures shall be initiated immediately to establish the conditions listed in Specifications 3.7.C.1(a) through (d), and compliance shall be completed within 24 hours thereafter.

### 4.7 SURVEILLANCE REQUIREMENTS

- once per operating cycle not to exceed 18 months. If the ultrasonic test indicates the presence of a leak, the condition will be evaluated and the gasket repaired or replaced as necessary.
- f. DOP and halogenated hydrocarbon test shall be performed following any design modification to the Standby Gas Treatment System housing that could have an effect on the filter efficiency.
- g. An air distribution test demonstrating uniformity within  $\pm 20\%$  across the HEPA filters and charcoal adsorbers shall be performed if the SGTS housing is modified such that air distribution could be affected.
3. a. At least once per operating cycle automatic initiation of each branch of the Standby Gas Treatment System shall be demonstrated.
- b. Operability testing of valves shall be in accordance with Specification 4.6.E.
- c. When one circuit of the Standby Gas Treatment System is made or found to be inoperable, the other circuit shall have been or shall be demonstrated to be operable within 24 hours.

BASES: 3.7 (Cont'd)

The Standby Gas Treatment System (SGTS) is designed to filter and exhaust the Reactor Building atmosphere to the stack during secondary containment isolation conditions, with a minimum release of radioactive materials from the Reactor Building to the environs. To insure that the standby gas treatment system will be effective in removing radioactive contaminants from the Reactor Building air, the system is tested periodically to meet the intent of ANSI N510-1975. Both standby gas treatment fans are designed to automatically start upon containment isolation and to maintain the Reactor Building pressure to approximately a negative 0.15 inch water gauge pressure; all leakage should be in-leakage. Should the fan fail to start, the redundant alternate fan and filter system is designed to start automatically. Each of the two fans has 100% capacity. This substantiates the availability of the operable circuit and results in no added risk; thus, reactor operation or refueling operation can continue. If neither circuit is operable, the plant is brought to a condition where the system is not required.

When the reactor is in cold shutdown or refueling the drywell may be open and the Reactor Building becomes the only containment system. During cold shutdown the probability and consequences of a DBA LOCA are substantially reduced due to the pressure and temperature limitations in this mode. However, for other situations under which significant radioactive release can be postulated, such as during operations with a potential for draining the reactor vessel, during core alterations, or during movement of irradiated fuel in the secondary containment, operability of standby gas treatment is required. An alternate electrical power source for the purposes of Specification 3.7.B.1.b shall consist of either an Emergency Diesel Generator (EDG) or the Vernon Hydro tie line. Maintaining availability of the Vernon Hydro tie line as an alternative to one of the EDGs in this condition provides assurance that standby gas treatment can, if required, be operated without placing undue constraints on EDG maintenance availability. Inoperability of both circuits of the SGTS or both EDGs during refueling operations requires suspension of activities that represent a potential for releasing radioactive material to the secondary containment, thus placing the plant in a condition that minimizes risk.

Use of the SGTS, without the fan and the 9 kW heater in operation, as a vent path during torus venting does not impact subsequent adsorber capability because of the very low flows and because humidity control is maintained by the standby 1 kW heaters, therefore operation in this manner does not accrue as operating time.

D. Primary Containment Isolation Valves

Double isolation valves are provided on lines that penetrate the primary containment and communicate directly with the reactor vessel and on lines that penetrate the primary containment and communicate with the primary containment free space. Closure of one of the valves in each line would be sufficient to maintain the integrity of the pressure suppression system. Automatic initiation is required to minimize the potential leakage paths from the containment in the event of a loss-of-coolant accident.

4.7 STATION CONTAINMENT SYSTEMS

A. Primary Containment System

The water in the suppression chamber is used only for cooling in the event of an accident, i.e., it is not used for normal operation; therefore, a weekly check of the temperature and volume is adequate to assure that adequate heat removal capability is present.

BASES: 3.7 (Cont'd)

The interiors of the drywell and suppression chamber are painted to prevent rusting. The inspection of the paint during each major refueling outage, approximately once per year, assures the paint is intact. Experience with this type of paint at fossil fueled generating stations indicates that the inspection interval is adequate.

Because of the large volume and thermal capacity of the suppression pool, the volume and temperature normally changes very slowly and monitoring these parameters daily is sufficient to establish any temperature trends. By requiring the suppression pool temperature to be continually monitored and frequently logged during periods of significant heat addition, the temperature trends will be closely followed so that appropriate action can be taken. The requirement for an external visual examination following any event where potentially high loadings could occur provides assurance that no significant damage was encountered. Particular attention should be focused on structural discontinuities in the vicinity of the relief valve discharge since these are expected to be the points of highest stress. Visual inspection of the suppression chamber including water line regions each refueling outage is adequate to detect any changes in the suppression chamber structures.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 143 TO FACILITY OPERATING LICENSE NO. DPR-28

VERMONT YANKEE NUCLEAR POWER CORPORATION

VERMONT YANKEE NUCLEAR POWER STATION

DOCKET NO. 50-271

1.0 INTRODUCTION

By letter dated December 8, 1994, as supplemented by letter dated February 16, 1995, the Vermont Yankee Nuclear Power Corporation (the licensee) submitted a request for changes to the Vermont Yankee Nuclear Power Station Technical Specifications (TSs), Sections 3.7.B and 4.7.B. The requested changes would (1) clarify the alternate power source requirements for the standby gas treatment system (SGTS) during the performance of fuel handling activities; (2) clarify the time requirements related to laboratory carbon sample analysis of the SGTS; and (3) clarify the definition of SGTS system operation for determining the frequency of specified tests. By the letter dated February 16, 1995, the licensee revised the proposed changes to TS Section 3.7.B.1.b and the corresponding Bases section to clarify that the associated emergency diesel generator (EDG) or Vernon tie provide alternate electrical power sources to the normal offsite auxiliary electrical power source required for SGTS operability. The February 16, 1995, letter provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

2.0 EVALUATION

2.1 Standby Gas Treatment During Refueling Operations

The licensee proposed to change Vermont Yankee TS Sections 3.7.B.1 and 3.7.B.3. TS Section 3.7.B.1 currently reads as follows: "Except as specified in Specification 3.7.B.3 below, both circuits of the standby gas treatment system and the diesel generators required for operation of such circuits shall be operable at all times when secondary containment integrity is required." The licensee proposed to change TS Section 3.7.B.1 into two Sections 3.7.B.1.a and 3.7.B.1.b to read as follows:

- 3.7.B.1.a      Except as specified in Specification 3.7.B.3.a below, whenever the reactor is in Run Mode or Startup Mode, both circuits of the Standby Gas Treatment System shall be operable at all times when secondary containment integrity is required.

9503290329 950323  
PDR ADOCK 05000271  
PDR

- 3.7.B.1.b Except as specified in Specification 3.7.B.3.b below, whenever the reactor is in Refuel Mode, both circuits of the Standby Gas Treatment System and an alternate electrical power source, consisting of the associated Emergency Diesel Generator or Vernon tie, for each standby gas treatment circuit shall be operable at all times when secondary containment integrity is required.

TS Section 3.7.B.3 currently reads as follows: "From and after the date that one circuit of the standby gas treatment system is made or found to be inoperable for any reason, reactor operation is permissible only during the succeeding seven days unless such circuit is sooner made operable, provided that during such seven days all active components of the other standby gas treatment circuit shall be operable." The licensee proposed to change the TS Section 3.7.B.3 into Sections 3.7.B.3.a and 3.7.B.3.b to read as follows:

- 3.7.B.3.a From and after the date that one circuit of the Standby Gas Treatment System is made or found to be inoperable for any reason, reactor operation is permissible only during the succeeding seven days unless such circuit is sooner made operable, provided that during such seven days all active components of the other standby gas treatment circuit shall be operable.
- 3.7.B.3.b From and after the date that one circuit of the Standby Gas Treatment System is made or found to be inoperable for any reason, operations requiring secondary containment are permissible only during the succeeding seven days unless such circuit is sooner made operable, provided that during such seven days all active components, including the associated Emergency Diesel Generator of the other standby gas treatment circuit shall be operable.

The licensee modified the Bases section (TS Section 3.7.C) by adding the following:

When the reactor is in cold shutdown or refueling the drywell may be open and the Reactor Building becomes the only containment system. During cold shutdown the probability and consequences of a DBA LOCA are substantially reduced due to the pressure and temperature limitations in this mode. However, for other situations under which significant radioactive release can be postulated, such as during operations with a potential for draining the reactor vessel, during core alterations, or during movement of irradiated fuel in the secondary containment, operability of standby gas treatment is required. An alternate electrical power source for the purposes of

Specification 3.7.B.1.b shall consist of either an emergency diesel generator (EDG) or the Vernon Hydro tie line. Maintaining availability of the Vernon Hydro tie line as an alternative to one of the EDGs in this condition provides assurance that standby gas treatment can, if required, be operated without placing undue constraints on EDG maintenance availability. Inoperability of both circuits of the SGTS or both EDGs during refueling operations requires suspension of activities that represent a potential for releasing radioactive material to the secondary containment, thus placing the plant in a condition that minimizes risk.

The licensee stated that TS Section 3.7.B.1 as presently written imposes a requirement that both EDGs be available during refueling operations so that both circuits of the SGTS are operable. The licensee proposes to eliminate reference in TS Section 3.7.B.1.a to the EDGs during power operation (a subject adequately addressed in TS Section 3.10) and to add a TS Section 3.7.B.1.b to address refueling operations. The licensee would revise the limiting conditions for operation LCO in TS Section 3.7.B.3 to include requirements in the operating mode (TS Section 3.7.B.3.a) and would add requirements applying to other operations requiring secondary containment (TS Section 3.7.B.3.b). The proposed amendment specifies the requirements for electrical power availability for the SGTS system during all operations and gives operability requirements that are safe, reasonable, and consistent with license conditions at other BWR facilities. The proposed amendment requires that an alternate power supply be available in the event that an emergency diesel generator is out of service during refueling operations (currently not a requirement). The licensee stated that keeping the Vernon tie line available as an alternate electrical power source that can be substituted for an out-of-service EDG during refueling will ensure that either train of SGTS can, if required, be operated without entering a LCO. The availability and reliability of this substitute alternate power source are comparable to those of the EDGs, and it can be quickly connected to either emergency bus from the control room by manual action.

These TS changes do not alter the function of the SGTS or any TS setpoint. The changes do not affect any safety analysis in the final safety analysis report (FSAR) or change the function of any equipment. The changes will allow the licensee to voluntarily remove an EDG from service without entering an LCO during refueling outage when containment integrity is required and will make the Vermont Yankee TS consistent with the license conditions of other BWR facilities. Accordingly, the NRC staff finds the proposed change acceptable.

## 2.2 Laboratory Carbon Sample Analysis

The licensee proposed to change TS Section 3.7.B.2.b to clarify the time requirements related to laboratory carbon sample analysis of the SGTS. TS Section 3.7.B.2.b currently reads as follows: "The results of laboratory carbon sample analysis shall show  $\geq 95\%$  radioactive methyl iodide removal. (130°C, 95% RH)"

The licensee proposed to change TS Section 3.7.B.2.b to read as follows:

The results of laboratory carbon sample analysis shall show  $\geq 95\%$  radioactive methyl iodide removal. (130°C, 95% RH). Laboratory analysis results shall be verified acceptable within 31 days following sample removal or the applicable train of the Standby Gas Treatment System shall be considered in-operable and the requirements of Specification 3.7.B.3 shall apply.

The licensee stated that, since it typically takes several weeks to obtain completed results of laboratory analyses, it has become necessary for the licensee to remove the laboratory samples for analysis in advance of the anticipated end of the test interval. Determining the start and end of test intervals in relation to the time of removal of the sample and time of completion of laboratory analysis has required some judgment on the part of the licensee. The licensee also stated that determining operability relative to test interval, sample removal, and completion of laboratory analysis requires clarification. To clarify the appropriate requirements, the licensee proposed to incorporate an explicit statement of the time following sample removal allowed for completion of the analysis and the determination of operability during this interval. The proposed statement is consistent with guidance provided by the NRC staff in Generic Letter 83-13. Therefore, the NRC staff finds the proposed change acceptable.

### 2.3 Torus Vent Mode

The licensee proposed to change TS section 4.7.B.2.c to clarify the definition of system operation used to determine the surveillance test interval related to laboratory carbon sample analysis and halogenated hydrocarbon tests of the SGTS. TS 4.7.B.2.c currently reads, in part, as follows: "In addition, the sample analysis of Specification 3.7.B.2.b and the halogenated hydrocarbon test shall be performed after every 720 hours of system operation."

The licensee proposed to change that portion of TS section 4.7.B.2.c to read as follows:

In addition, the sample analysis of Specification 3.7.B.2.b and the halogenated hydrocarbon test shall be performed after every 720 hours of normal system operation.

Additionally, the licensee added a related note to the Bases as follows:

Use of the SGTS, without the fan and the 9 kW heater in operation, as a vent path during torus venting does not impact subsequent adsorber capability because of the very low flows and because humidity control is maintained by the standby 1 kW heaters, therefore operation in this manner does not accrue as operating time.

The licensee stated that operation of the SGTS in the torus venting mode results in insignificant flow through the filters (<1% of rated design flow). Additionally, the licensee noted that since the 1 kW heaters are operated in this mode, low humidity is maintained and adsorber degradation is prevented. The licensee proposed to add the word "normal" to the specification such that system operation in the torus venting mode will not be included in determining the surveillance interval. The licensee asserts that there are no safety consequences to this clarification.

The proposed TS change does not alter the function of the SGTS or any TS setpoint. The change does not affect any safety analysis in the FSAR or change the function of any equipment. The laboratory carbon sample analysis and the halogenated hydrocarbon test will continue to be required after every 720 hours of system operation that has potential to degrade filter capability. Therefore, the NRC staff finds this change acceptable.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Vermont State official was notified of the proposed issuance of the amendment. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (60 FR 8759). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: A. Pal  
D. Dorman

Date: March 23, 1995