Entergy

Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
295 Broadway, Suite 1
P.O. Box 249
Buchanan, NY 10511-0249

January 8, 2002

Re: Indian Point Unit No. 2
Docket No. 50-247
NL-02-003

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, D.C. 20555-0001

SUBJECT: License Amendment Request (LAR No. 02-003) - Deletion of Technical Specifications for the Fuel Storage Building Air Filtration System

References: 1. NRC letter to Con Edison, titled "Indian Point Nuclear Generating Unit No. 2 – Re: Issuance of Amendment Affecting Containment Air Filtration, Control Room Air Filtration, and Containment Integrity During Fuel Handling Operations (TAC No. MA6955)," dated July 27, 2000

Pursuant to 10CFR50.90, Entergy Nuclear Operations, Inc. (ENO) requests an amendment to the Indian Point Unit No. 2 (IP2) Technical Specifications (TS) to delete the requirements governing the Fuel Storage Building Air Filtration System. The proposed changes affect IP2 TS 3.8, "Refueling, Fuel Storage and Operations with the Reactor Vessel Head Bolts Less Than Fully Tensioned," and TS 4.5.F, "Fuel Storage Building Air Filtration System." This change provides a significant cost savings and operational flexibility to IP2 without any increase in the consequences of the analyzed fuel handling accident in the fuel storage building. This request is consistent with the IP2 radiological consequences analysis performed to show compliance with 10CFR50.67 that was reviewed and found acceptable by the NRC as discussed in the staff's Safety Evaluation (Ref. 1)

The Station Nuclear Safety Committee (SNSC) and the Nuclear Facilities Safety Committee (NFSC) have reviewed the proposed changes. Both committees concur that the proposed changes do not represent a significant hazards consideration as defined by 10CFR50.92(c).

Attachment 1 to this letter provides the description and evaluation of the proposed change. The revised TS pages are provided in Attachment 2 (strikeout/shadow format).

ENO requests that the proposed changes be approved by June 30, 2002 with an effective date within 60 days of approval. The approval date is requested so that IP2 can benefit from the requested change during the refueling outage scheduled for the Fall of 2002.

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In accordance with 10CFR50.91, a copy of this submittal with its associated attachments is being submitted to the designated New York State official.

This submittal contains new commitments listed in Attachment 3.

Should you have any questions or require additional information, please contact Mr. John F. McCann, Manager Nuclear Safety and Licensing, at (914) 734-5074.

Sincerely,

Fred Dacimo
Vice President – Operations
Indian Point 2

Attachments

cc: See page 3

cc:

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
Entergy Nuclear Operations, Inc.	)	Docket Nos. 50-247
Indian Point Nuclear Generating Unit No. 2	)	

APPLICATION FOR AMENDMENT
TO OPERATING LICENSE

Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission, Entergy Nuclear Operations, as holder of Facility Operating No. DPR-26, hereby applies for amendment of the Indian Point Unit 2 Technical Specifications contained in Appendix A of the license.

The specific proposed Technical Specification revisions are set forth in Attachment 2. The associated assessments demonstrate that the proposed changes do not involve a significant hazards consideration as defined in 10CFR50.92(c).

As required by 10CFR50.91(b)(1), a copy of this Application and an analysis concluding that the proposed changes do not involve a significant hazards consideration have been provided to the designated New York State official

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ENTERGY NUCLEAR
OPERATIONS, INC.

BY: _____

Fred Dacimo
Vice President – Operations
Indian Point 2

STATE OF NEW YORK
COUNTY OF WESTCHESTER
Subscribed and sworn to
before me this 8th day
January, 2002.

Notary Public

Karen L. Lancaster

KAREN L. LANCASTER
Notary Public, State of New York
No. 60-4643039
Qualified In Westchester County
Term Expires 9/30/05

ATTACHMENT 1 TO NL 02-003

LICENSE AMENDMENT REQUEST

Deletion of Technical Specifications for the Fuel Storage Building Air Filtration System

ENTERGY NUCLEAR OPERATIONS, INC
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

LICENSE AMENDMENT REQUEST

DESCRIPTION OF THE PROPOSED CHANGE

Entergy Nuclear Operations, Inc. (ENO) is requesting a change to the Indian Point Unit No. 2 (IP2) Technical Specifications (TS) to delete the requirements for the Fuel Storage Building (FSB) Air Filtration System. The TS that are affected by the proposed change are TS 3.8, "Refueling, Fuel Storage and Operations with the Reactor Vessel Head Bolts Less Than Fully Tensioned," and TS 4.5.F, "Fuel Storage Building Air Filtration System."

REASON FOR THE PROPOSED CHANGE

The FSB Air Filtration System no longer meets any criteria of 10CFR50.36 for inclusion in the TS as a Limiting Condition for Operation. The TS for operation of the FSB Air Filtration system are no longer consistent with the UFSAR analysis for Fuel Handling Accident (FHA) Analysis in the FSB.

EVALUATION OF THE PROPOSED CHANGE

The FSB Air Filtration System is currently in TS because it met criterion 3 of 10CFR50.36(c)(2)(ii). The system had been credited in the IP2 UFSAR as a system that was part of the primary success path and which functioned to mitigate a FHA in the FSB. System operability was required to filter and thus limit the atmospheric release of fission products in the event of a FHA in the FSB to a small fraction of the 10CFR100 limits.

10CFR50 Appendix A Criterion 61, "Fuel Storage and Handling and Radioactivity Control Requirements," requires that:

> The fuel storage and handling, radioactive waste, and other systems which may contain radioactivity shall be designed to assure adequate safety under normal and postulated accident conditions. These systems shall be designed (1) with a capability to permit appropriate periodic inspection and testing of components important to safety, (2) with suitable shielding for radiation protection, (3) with appropriate containment, confinement, and filtering systems, (4) with a residual heat removal capability having reliability and testability that reflects the importance to safety of decay heat and other residual heat removal, and (5) to prevent significant reduction in fuel storage coolant inventory under accident conditions.

In License Amendment 211 (Ref. 1), the Licensing Basis for IP2 for offsite radiation exposure from analyzed accidents was changed from 10CFR100 to 10CFR50.67. As described in the SER for License Amendment 211 and in the current IP2 UFSAR 14.2.1.1, the limits of 10CFR50.67 are met for both offsite dose and control room dose for a FHA in the FSB with no credit for the removal of iodine by the FSB Air Filtration System. In fact, the doses are less than 25% of the 10CFR50.67 limits.

The FHA analysis assumes that fuel movement occurs at the time allowed by TS 3.8 (i.e., 100 hours after shutdown). Since the radiological consequences at that time are well within regulatory requirements, all irradiated fuel movement in the FSB at IP2 is

movement of not-recently-irradiated fuel.[1] This provides added assurance that potential dose from a FHA in the FSB will remain below regulatory limits.

Since the FSB air filtration system is not required to mitigate a FHA in the FSB, there is no criterion in 10CFR50.36 that requires its inclusion in the TS.

The FSB ventilation system, including the Air Filtration system, is currently described in the UFSAR section 9.10, "Fuel Storage Building Ventilation System." There are currently no plans to change the design of the FSB Ventilation system. However IP2 anticipates that a future design change will remove the charcoal filters. If the proposed TS change is approved, future changes to the FSB Ventilation system will be controlled by 10CFR50.59. This level of control is appropriate for the safety significance of the FSB air filtration system. This proposed TS change, if approved, would ensure ENO and NRC resources are not utilized for changes to a system that now has reduced safety significance.

ENO will continue to operate the FSB ventilation system during the movement of irradiated fuel assemblies in the FSB. This will ensure that any radioactivity from a damaged fuel assembly will be released to atmosphere through a monitored and elevated plant vent, thus ensuring effective ALARA compliance with 10CFR20. ENO will allow the FSB ventilation boundary to be open while irradiated fuel movement is in progress provided administrative controls are in place to quickly close the openings in the event of a FHA. This provides flexibility for personnel and equipment access while continuing to provide the assurance that potential releases from a FSB FHA are released to the atmosphere through a monitored and elevated pathway. To maintain an adequate level of regulatory control, ENO commits to relocate to UFSAR section 9.10 the TS 3.8 system operating requirements and the TS 4.5.F system testing requirements.

The proposed deletion of the TS and anticipated operational changes would allow increased operational flexibility in the FSB when irradiated fuel assemblies are being moved. At the same time, licensing basis conditions that are conservative with respect to the FHA analysis will be maintained.

The proposed TS is consistent with requirements presented in NUREG-1431, "Standard Technical Specifications – Westinghouse Plants." NUREG-1431 only requires operability of the FSB Air Filtration system when recently irradiated fuel is being moved within the FSB. Approval of the proposed TS will facilitate the IP2 transition to the Standard Technical Specifications.

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[1] NUREG-1431, "Standard Technical Specifications – Westinghouse Plants," describes fuel as not being recently irradiated if the release of fission product radioactivity, subsequent to a fuel handling accident, results in doses that are well within the guideline values specified in 10CFR100. Standard Review Plan, Section 15.7.4, Rev. 1, defines "well within" 10CFR100 to be 25% or less of the 10CFR100 values. The acceptance limits for offsite radiation exposure will be 25% of 10CFR100 values or the NRC staff approved licensing basis (e.g., a specified fraction of 10 CFR 100 limits). Since the current licensing basis for IP2 for radiological consequences is 10CFR50.67 rather than 10CFR100, the ENO conclusion that the fuel is not recently irradiated is based on 10CFR50.67 rather than 10CFR100 values.

Conclusion

In conclusion, based on the considerations above, (1) there is a 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.

NO SIGNIFICANT HAZARDS CONSIDERATION

The proposed changes described above do not involve a significant hazards consideration. This conclusion is based on the evaluation, in accordance with 10CFR50.91(a)(1), of the three standards set forth in 10CFR50.92(c).

1. **Does the proposed license amendment involve a significant increase in the probability or in the consequences of an accident previously evaluated?**

   The fuel storage building air filtration system is not involved in the initiation of any accident nor does it function to prevent any accident. The fuel storage building air filtration system was an accident mitigating system. Therefore there is no affect on the probability of occurrence of a fuel handling accident in the fuel storage building.

   The fuel storage building air filtration system was designed to provide an accident mitigation function by filtering the radionuclides that might have been released from a damaged fuel assembly in the event of a fuel handling accident. The charcoal adsorber was the primary component that supported this filtration function. However based on the recent IP2 analyses to show compliance with 10CFR50.67, it has been shown that the doses to the public and to control room operators due to a fuel handling accident remain well within regulatory limits even assuming no credit for either isolation or filtration. Therefore the charcoal filtration function is not required in the event of a fuel handling accident.

   There would be no change to the radiological consequences of the fuel handling accident in the fuel storage building analysis as a result of the proposed change. The proposed changes ensure that the assumptions of the fuel handling accident analysis for the release of radioactivity from a damaged fuel assembly in the fuel storage building are maintained.

   Therefore, there will be no increase in the probability or in the consequences of an accident previously evaluated.

2. **Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?**

   The fuel storage building air filtration system is not an accident initiator. It was designed as an accident mitigation system to filter the radionuclides that may be released from a damaged fuel assembly during a fuel handling accident. The fuel storage building air filtration system does not affect any accident initiator

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

3. **Does the proposed amendment involve a significant reduction in a margin of safety?**

The margin of safety is defined by 10CFR50.67 and 10CFR50 Appendix A Criterion 19. The radiological consequences of a fuel handling accident in the fuel storage building have been shown to be well within the regulatory requirements even when assuming no credit for the fuel storage building air filtration system operation.

The proposed change ensures that the assumptions of the current fuel handling analysis for the release of radioactivity from a damaged fuel assembly are maintained.

Therefore, the change does not result in a change to any of the safety analyses or any margin of safety.

CONCLUSION

Based on the above evaluation, ENO has concluded that the proposed change will not result in a significant increase in the probability or consequences of any accident previously analyzed; will not result in a new or different kind of accident from any accident previously analyzed; and does not result in a reduction in any margin of safety. Accordingly, these proposed changes do not involve a significant hazards consideration. The Station Nuclear Safety Committee (SNSC) and the Nuclear Facilities Safety Committee (NFSC) have reviewed the proposed changes. Both committees concur that the proposed changes do not involve a significant hazards consideration as defined by 10CFR50.92(c).

ENVIRONMENTAL ASSESSMENT

An environmental assessment is not required for the above proposed changes because the requested changes to the Indian Point Generating Station Unit 2 Technical Specifications conform to the criteria for "actions eligible for categorical exclusion," as specified in 10CFR51.22(c)(9). The requested changes will have no impact on the environment. The proposed changes do not involve a significant hazards consideration as discussed in the preceding section. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, the proposed changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

REFERENCE

1. NRC letter to Con Edison, titled "Indian Point Nuclear Generating Unit No. 2 – Re: Issuance of Amendment Affecting Containment Air Filtration, Control Room Air Filtration, and Containment Integrity During Fuel Handling Operations (TAC No. MA6955)," dated July 27, 2000

ATTACHMENT 2 TO NL 02-003

TECHNICAL SPECIFICATION PAGES IN

STRIKEOUT/SHADOW FORMAT

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refueling crane for this event must be equal to or greater than the maximum load to be assumed by the refueling crane during the refueling operation. A thorough visual inspection of the refueling crane shall be made after the dead-load test and prior to fuel handling.

6. ~~The fuel storage building charcoal filtration system must be operating whenever spent fuel movement is taking place within the spent fuel storage areas unless the spent fuel has had a continuous 35-day decay period.~~ DELETED

7. Radiation levels in the spent fuel storage area shall be monitored continuously whenever spent fuel movement is taking place in that area.

8. The equipment door, or a closure plate that restricts direct air flow from the containment, shall be properly installed. In addition, at least one isolation valve shall be operable or locked closed in each line penetrating the containment and which provides a direct path from containment atmosphere to the outside.

9. Radiation levels in containment shall be monitored continuously.

10. During alteration of the core (including fuel loading or transfer), a person holding a senior operator license or a senior operator license limited to fuel handling shall be present to directly supervise the activity and, during this time, this person shall not be assigned other duties.

11. The minimum water level above the top of the reactor pressure vessel flange shall be at least 23 feet (El. 92'0") whenever movement of spent fuel is taking place inside the containment.

12. If any of the conditions specified above cannot be met, suspend all operations under this specification (3.8.B). Suspension of operations shall not preclude completion of movement of the above components to a safe conservative position.

C. The following conditions are applicable to the spent fuel pit any time it contains irradiated fuel:

1. The spent fuel cask shall not be moved over <u>any</u> region of the spent fuel pit until the cask handling system has been reviewed by the Nuclear Regulatory Commission and found to be acceptable. Furthermore, any load in excess of the nominal weight of a spent fuel storage rack and associated handling tool shall

~~The requirement for the fuel storage building charcoal filtration system to be operating when spent fuel movement is being made provides added assurance that the offsite doses will be within acceptable limits in the event of a fuel handling accident. The additional month of spent fuel decay time will provide the same assurance that the offsite doses are within acceptable limits and therefore the charcoal filtration system would not be required to be operating.~~

The spent fuel storage pit water level requirement in Specification 3.8.C.2 provides approximately 24 feet of water above fuel assemblies stored in the spent fuel storage racks.

The fuel enrichment and burnup limits in Specification 3.8.D.1 and the boron requirements in Specification 3.8.D.2 assure the limits assumed in the spent fuel storage safety analysis will not be exceeded.

The requirement that at least one RHR pump and heat exchanger be in operation ensures that sufficient cooling capacity is available to maintain reactor coolant temperature below 140°F, and sufficient coolant circulation is maintained through the reactor core to minimize the effect of a boron dilution incident and prevent boron stratification.

The requirement to have two RHR pumps and heat exchangers operable when there is less than 23 feet of water above the vessel flange ensures that a single failure will not result in a complete loss of residual heat removal capability. With the head removed and at least 23 feet of water above the flange, a large heat sink is available for core cooling, thus allowing adequate time to initiate actions to cool the core in the event of a single failure.

References

(1) FSAR Section 9.5.2

4. At least once every Refueling Interval(#) by:

a. verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches water gauge while operating the system at ambient conditions and at a flow rate of 2000 cfm ±10%.

b. verifying that, on a Safety Injection Test Signal or a high radiation signal in the control room, the system automatically switches into a filtered intake mode of operation with flow through the HEPA filters and charcoal adsorber banks. [1]

c. verifying that the system maintains the control room at positive pressure relative to the adjacent areas during the pressurization mode of operation at a makeup flow rate of 2000 cfm±10%.

5. After each complete or partial replacement of an HEPA filter bank, by verifying that the HEPA filter banks remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at ambient conditions and at a flow rate of 2000 cfm ±10%.

6. After each complete or partial replacement of a charcoal adsorber bank, by verifying that the charcoal adsorbers remove greater than or equal to 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at ambient conditions and at a flow rate of 2000 cfm ±10%.

F. ~~FUEL STORAGE BUILDING AIR FILTRATION SYSTEM~~ DELETED

~~The fuel storage building air filtration system specified in Specification 3.8 shall be demonstrated:~~

~~1. At least once per 31 days by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 minutes.~~

2. At each refueling, prior to refueling operations, or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) at any time painting, fire or chemical releases could alter filter integrity by:

a. verifying a system flow rate at ambient conditions of 20,000 cfm ±10% during system operation when tested in accordance with ANSI N510-1975.

b. verifying that the system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, at ambient conditions and at a flow rate of 20,000 cfm ±10%.

c. verifying, within 31 days after removal, that a laboratory test of a sample of the charcoal adsorber, when obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows a methyl iodide penetration of less than 7.5 % when tested in accordance with ASTM D3803-1989 at a temperature of 30 °C [86 °F], a relative humidity of 95 %, and a face velocity of 0.254 m/sec [50 ft/min].

3. Prior to handling spent fuel which has decayed for less than 35 days, within 31 days, verify that a laboratory test of a sample of a charcoal adsorber, when obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows a methyl iodide penetration of less than 7.5 % when tested in accordance with ASTM D3803-1989 at a temperature of 30 °C [86 °F], a relative humidity of 95 %, and a face velocity of 0.254 m/sec [50 ft/min]. Such an analysis is good for 720 hours of charcoal adsorber operation. After 720 hours of operation, if spent fuel with a decay time of less than 35 days is still being handled, a new sample is required along with a new analysis.

4. At each refueling prior to refueling operations by:

a. verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches water gauge while operating the system at ambient conditions, and at a flow rate of 20,000 cfm ±10%.

b. verifying that the system maintains the spent fuel storage pool area at a pressure less than that of the outside atmosphere during system operation.

~~5. After each complete or partial replacement of a HEPA filter bank, by verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at ambient conditions and at a flow rate of 20,000 cfm ±10%.~~

~~6. After each complete or partial replacement of a charcoal adsorber bank, by verifying that the charcoal adsorbers remove greater than or equal to 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at ambient conditions and at a flow rate of 20,000 cfm ±10%.~~

G. POST-ACCIDENT CONTAINMENT VENTING SYSTEM

The post-accident containment venting system shall be demonstrated operable:

1. At least once every Refueling Interval(#), or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) at any time painting, fire or chemical releases could alter filter integrity by:

   a. verifying no flow blockage by passing flow through the filter system.

   b. verifying that the system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, at ambient conditions and at a flow rate of 200 cfm ±10%.

   c. at Refueling Intervals (#), verifying, within 31 days after removal, that a laboratory test of a sample of the charcoal adsorber, when obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows a methyl iodide penetration of less than 15.0 % when tested in accordance with ASTM D3803-1989 at a temperature of 30 °C [86 °F], a relative humidity of 95 %, and a face velocity of 0.203 m/sec [40 ft/min].

2. Within 31 days of completing 720 hours of charcoal adsorber operation, verify that a laboratory test of a sample of the charcoal adsorber, when obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows a methyl iodide penetration of less than 15.0 % when tested in accordance with ASTM D3803-1989 at a temperature of 30 °C [86 °F], a relative humidity of 95 %, and a face velocity of 0.203 m/sec [40 ft/min].

The hydrogen recombiner system is an engineered safety feature which would function following a loss-of-coolant accident to control the hydrogen evolved in the containment. The passive autocatalytic recombiners(PARs) contain no control or support equipment which would require surveillance. No specific degradation mechanism has yet been identified for the catalysts plates in standby service. Periodic visual examination and cleaning if necessary is done to prevent significant gas blockage by dust or debris. Representative plates are periodically removed and their response to an approximately 1.5% hydrogen gas mixture is evaluated for evidence of unexpected degradation.

The biannual testing of the containment atmosphere sampling system will demonstrate the availability of this system.

The recirculation fluid pH control system is a passive safeguard with the baskets of trisodium phosphate located in the containment sump area. Periodic visual inspections are required (Refueling#) to verify the storage baskets are in place, have maintained their integrity, and filled with trisodium phosphate.

The control room air filtration system is designed to filter the control room atmosphere for intake air during control room isolation conditions. The control room air filtration system is designed to automatically start upon control room isolation. High-efficiency particulate absolute (HEPA) filters are installed upstream of the charcoal adsorbers to prevent clogging of these adsorbers. The charcoal adsorbers are installed to reduce the potential intake of radioiodine by control room personnel. The required in-place testing and the laboratory charcoal sample testing of the HEPA filters and charcoal adsorbers will provide assurance that Criterion 19 of the General Design Criteria for Nuclear Power Plants, Appendix A to 10 CFR Part 50 continues to be met.

~~The fuel storage building air filtration system is designed to filter the discharge of the fuel storage building atmosphere to the plant vent. HEPA filters and charcoal adsorbers are installed to reduce potential releases of radioactive material to the atmosphere. As required by Specification 3.8.B.6, the fuel storage building air filtration system must be operating whenever spent fuel is being moved unless the spent fuel has had a continuous 35-day decay period. The required in-place testing and the laboratory charcoal sample testing of the HEPA filters and charcoal adsorbers will provide added assurance that the criteria of 10 CFR 50.67 continue to be met.~~

Thus, the allowable methyl iodide penetration, by system, is as follows:

TS Sec.	System Name	Filter Efficiency	UFSAR Reference	Allowable Methyl Iodide Penetration
4.5.E	Control Room Air Filtration System	90%	Sec. 14.3.6.5	5.0%
~~4.5.F~~	~~Fuel Storage Building Air Filtration System~~	~~85%~~	~~Table 14.2-2~~	~~7.5%~~
4.5.G	Post-Accident Containment Venting System	70%	Sec. 14.3.6.1.3	15.0%

~~While UFSAR Sections 14.3.6.1.3 and 14.3.6.5 provide filter efficiencies for methyl iodide, UFSAR Table 14.2-2 just provides a combined iodide (methyl iodide and elemental iodide) efficiency. Since the methyl iodide efficiency is lower than the combined iodide efficiency, the use of the combined iodide efficiency provides a more conservative limit for testing purposes.~~

References

(1) UFSAR Section 6.2
(2) UFSAR Section 6.4
(3) NRC Generic Letter 99-02, dated June 3, 1999
(4) ~~UFSAR Table 14.2-2~~ UFSAR 14.2.1.1
(5) UFSAR Section 14.3.6.1.3
(6) UFSAR Section 14.3.6.5

1. In this instance Refueling Interval is defined by R##.

ATTACHMENT 3 TO NL 02-003

Commitments

ENTERGY NUCLEAR OPERATIONS, INC
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

Commitments

No.	Commitment Description	Implementation Schedule
1.	ENO will allow the FSB ventilation boundary to be open while irradiated fuel movement is in progress provided administrative controls are in place to quickly close the openings in the event of a FHA.	Prior to allowing the ventilation boundary to be open during such fuel movement
2.	ENO will relocate the FSB air filtration system operating requirements of TS 3.8 to UFSAR section 9.10.	Within the implementation period of the approved License Amendment
3.	ENO will relocate the FSB air filtration system testing requirements of TS 4.5.F to UFSAR section 9.10.	Within the implementation period of the approved License Amendment