

Indiana Michigan
Power Company
500 Circle Drive
Buchanan, MI 49107 1373



January 14, 2003
AEP.NRC:3075
10 CFR 50.90

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

SUBJECT: Donald C. Cook Nuclear Plant, Unit 1 and Unit 2
Docket Nos. 50-315 and 50-316
License Amendment Request - Change to Control Room
Emergency Ventilation System Technical Specification to Provide
Exception to Specification 3.0 4 During Movement of Irradiated
Fuel Assemblies

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant Unit 1 and Unit 2, proposes to amend Appendix A, Technical Specifications (TS), of Facility Operating Licenses DPR-58 and DPR-74. I&M proposes to revise the TS for the control room emergency ventilation system (CREVS) such that movement of irradiated fuel assemblies will be allowed to commence with one CREVS pressurization train inoperable, provided the appropriate TS Action requirements are implemented. The proposed change is consistent with applicable design requirements in Appendix A to 10 CFR 50, current Nuclear Regulatory Commission (NRC) guidance regarding standard TS, and a precedent licensing action for another nuclear power plant.

Enclosure 1 to this letter provides an affirmation regarding the statements made and matters set forth in this letter. Enclosure 2 provides a detailed description and safety analysis to support the proposed amendment, including an evaluation of significant hazards considerations pursuant to 10 CFR 50.92(c) and an

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environmental assessment. Attachments 1A and 1B provide TS pages marked to show the proposed change for Unit 1 and Unit 2, respectively. Attachments 2A and 2B provide TS pages with the proposed change incorporated for Unit 1 and Unit 2, respectively. There are no new regulatory commitments made in this letter.

I&M requests approval of the proposed amendments by March 17, 2003, to support planning for the next Unit 2 refueling outage. Once approved, the amendment will be implemented within 30 days.

No pending amendment requests affect the TS pages that are submitted in this request. If any future submittals affect these TS pages, I&M will coordinate the changes to the pages with the NRC Project Manager to ensure proper TS page control when the associated license amendment requests are approved.

If you have any questions or require additional information, please contact Mr. Brian A. McIntyre, Manager of Regulatory Affairs, at (269) 697-5806.

Sincerely,



J. E. Pollock
Site Vice President

/rdw

Enclosures:

- 1 Affirmation
- 2 License Amendment Request - Change to Control Room Emergency Ventilation System Technical Specification to Provide Exception to Specification 3.0.4 During Movement of Irradiated Fuel Assemblies

Attachments:

- 1A and 1B Technical Specification Pages Marked To Show Proposed Change
2A and 2B Proposed Technical Specification Pages

- c: K. D. Curry, Ft. Wayne AEP
 J. E. Dyer, NRC Region III
 MDEQ - DW & RPD
 NRC Resident Inspector
 J. F. Stang, Jr., NRC Washington, DC
 R. Whale, MPSC

bc: A. C. Bakken III, w/o enclosures/attachments
M. J. Finissi, w/o enclosures/attachments
S. A. Greenlee
D. W. Jenkins, w/o enclosures/attachments
J. A. Kobyra, w/o enclosures/attachments
B. A. McIntyre, w/o enclosures/attachments
J. E. Newmiller
J. E. Pollock, w/o enclosures/attachments
M. K. Scarpello, w/o enclosures/attachments
D. J. Poupard
T. K. Woods, w/o enclosures/attachments

AFFIRMATION

I, Joseph E. Pollock, being duly sworn, state that I am Site Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining to I&M are true and correct to the best of my knowledge, information, and belief.

American Electric Power Service Corporation



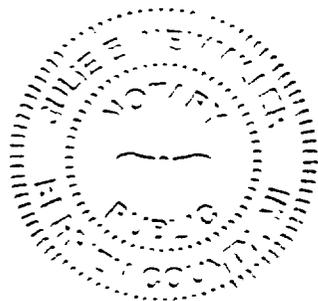
J. E. Pollock
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 14th DAY OF January 2003
Julie Newmiller
Notary Public

My Commission Expires 8-22-2004

JULIE E. NEWMILLER
Notary Public, Berrien County, MI
My Commission Expires Aug 22, 2004



License Amendment Request
Change to Control Room Emergency Ventilation System Technical Specification to
Provide Exception to Specification 3.0.4
During Movement of Irradiated Fuel Assemblies

1.0 Description

Pursuant to 10 CFR 50.90, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Unit 1 and Unit 2, proposes to amend Appendix A, Technical Specifications (TS), of Facility Operating Licenses DPR-58 and DPR-74. I&M proposes to revise the TS for the control room emergency ventilation system (CREVS) such that movement of irradiated fuel assemblies will be allowed to commence with one CREVS pressurization train inoperable, provided the appropriate TS Action requirements are implemented. The proposed change is consistent with applicable design requirements in Appendix A to 10 CFR 50, current Nuclear Regulatory Commission (NRC) guidance regarding standard TS, and a precedent licensing action for another nuclear power plant.

2.0 Proposed Change

CNP Unit 1 and Unit 2 TS 3.0.4 states:

“Entry into an OPERATIONAL MODE or other specified Applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION statements.”

The Limiting Conditions for Operation (LCOs) for CNP Unit 1 and Unit 2 TS 3.7.5.1 state in part:

“The CREVS shall be OPERABLE with:

- a. Two independent pressurization trains, and
- b. One charcoal adsorber/high efficiency particulate air (HEPA) filter unit.”

The Actions for CNP Unit 1 and Unit 2 TS 3.7.5.1 state in part:

“During the movement of irradiated fuel assemblies:

- d. With one pressurization train inoperable, restore the inoperable pressurization train to OPERABLE status within 7 days, or initiate and maintain operation of the remaining OPERABLE train in the pressurization/cleanup alignment.
- e. With any of the following: (1) both pressurization trains inoperable; (2) the filter unit inoperable; or (3) the control room envelope/pressure boundary inoperable, immediately suspend all operations involving the movement of irradiated fuel assemblies.”

The proposed change will add a new Action “F” stating that the provisions of Specification 3.0.4 are not applicable to movement of irradiated fuel assemblies.

Attachments 1A and 1B to this letter provide TS pages marked to show the proposed change for Unit 1 and Unit 2, respectively. Attachments 2A and 2B to this letter provide TS pages with the proposed change incorporated for Unit 1 and Unit 2, respectively.

3.0 Background

The CREVS, in conjunction with the control room envelope/pressure boundary, is designed to maintain the control room habitable for personnel during and following credible accidents. The CREVS contains two pressurization trains, with each pressurization train consisting of a pressurization fan, normal intake air damper, and emergency intake air damper. Each CREVS pressurization train is powered from a corresponding train of normal and emergency electrical power. Both CREVS pressurization trains supply air to a common charcoal adsorber/HEPA filter. Upon actuation, the pressurization train(s) and charcoal adsorber/HEPA filter maintain the control room at a positive pressure, with respect to the atmosphere, using air from which a high percentage of radioactivity has been removed. This design provides assurance that the radiation exposure to control room personnel during a design basis accident (including a fuel handling accident) would be maintained in accordance with the limits specified in 10 CFR 50, Appendix A, General Design Criteria (GDC) 19. Additional information regarding the CREVS design and the analysis of a fuel handling accident is provided in Section 9.10 “Control Room Ventilation System,” Unit 1 Section 14.2.1, “Fuel Handling Accident,” and Unit 2 Section 14.2.1, “Radiological Consequences of a Fuel Handling Accident,” of the CNP Updated Final Safety Analysis Report.

At CNP, refueling outages typically include periods in which electric power trains are denergized one at a time, rendering the associated CREVS pressurization train inoperable. Currently, if a CREVS pressurization train is rendered inoperable while movement of irradiated fuel assemblies is in progress, TS 3.7.5.1 allows fuel assembly movement to continue, provided the

requirements of Action "d" are implemented. However, if a CREVS pressurization train is rendered inoperable, the application of TS 3.0.4 to the TS 3.7.5.1 Applicability condition of "During the movement of irradiated fuel assemblies," as currently required, does not allow initiation of irradiated fuel assembly movement until both CREVS pressurization trains are made operable. This application of TS 3.0.4 significantly reduces flexibility in scheduling electrical train maintenance and fuel handling operations, both of which are major refueling outage activities.

4.0 Technical Analysis

As described below, the proposed change maintains compliance with the applicable design requirements of GDC 19, is consistent with the Standard Technical Specifications for Westinghouse Plants, NUREG-1431, Revision 2 (Reference 1), and is consistent with a precedent licensing action for the Virgil C. Summer Nuclear Station (Reference 2).

Compliance with GDC 19

As noted above, GDC 19 specifies limits for radiation exposure of control room personnel during design basis accidents. The GDC 19 limit that applies to plants using an NRC approved alternative source term is that exposures shall not exceed 5 rem Total Effective Dose Equivalent (TEDE). I&M proposed (Reference 3), and the NRC approved (Reference 4), use of an alternative source term in determining the dose to control room personnel at CNP. Reference 3 included an analysis demonstrating that the dose to control room personnel from a fuel handling accident in either the containment building or the fuel handling building would be below the 5 rem TEDE limit of GDC 19. This analysis credited operator action to actuate a single CREVS pressurization train within 30 minutes of the accident.

The only affect of the proposed change to TS 3.7.5.1 is to remove a restriction regarding the sequencing of CREVS pressurization train inoperability and commencement of irradiated fuel assembly movement. TS 3.7.5.1 will continue to require implementation of Action "d" if irradiated fuel assemblies are moved with one CREVS pressurization train inoperable, regardless of whether the fuel movement or the pressurization train inoperability occurs first. The requirements of Action "d" assure compliance with the limits of GDC 19 by ensuring that the remaining CREVS pressurization train is operable, that no failures preventing actuation will occur, and that any active failure would be readily detected. TS 3.7.5.1 will also continue to preclude either commencing or continuing movement of irradiated fuel assemblies if both CREVS pressurization trains are inoperable, since compliance with Action "e" will not be affected by the change. Therefore, TS 3.7.5.1 will continue to assure compliance with the limits of GDC 19.

Consistency with NUREG-1431

NUREG-1431, Specification 3.7.10, provides LCOs and Action requirements for a standard system designated as the control room emergency filtration system (CREFS). The CREFS corresponds to the CREVS at CNP, except that each CREFS train is assumed to include a charcoal adsorber/HEPA filter unit, whereas the CNP CREVS contains a single charcoal adsorber/HEPA filter unit supplied by two redundant pressurization trains.

NUREG-1431, LCO 3.7.10, requires that two CREFS trains be operable during the movement of irradiated fuel assemblies. The applicable NUREG-1431, Specification 3.7.10 Actions are as follows:

- Action A requires that, if one CREFS train is inoperable during the movement of irradiated fuel assemblies, the inoperable train must be restored to operable status within 7 days.
- Action D requires that, if Action A is not met during the movement of irradiated fuel assemblies, the operable CREFS train must be placed in the emergency mode, or movement of irradiated fuel assemblies must be suspended immediately.
- Action E requires that, if two CREFS trains are inoperable during the movement of irradiated fuel assemblies, the movement of irradiated fuel assemblies must be suspended immediately.

Therefore, NUREG-1431, Specification 3.7.10, Actions A and D, require actions for one inoperable CREFS trains during the movement of irradiated fuel assemblies that are similar to the actions required by CNP TS 3.7.5.1 Action “d.” Similarly, NUREG-1431, Specification 3.7.10, Action E requires actions for two inoperable CREFS trains during the movement of irradiated fuel assemblies that are similar to the actions required by CNP TS 3.7.5.1 Action “e.”

NUREG-1431, LCO 3.0.4 corresponds to CNP TS 3.0.4 in that it establishes requirements for entry into a specified Applicability condition with respect to compliance with the associated LCO and reliance on the associated Action statement. However, unlike CNP TS 3.0.4, NUREG-1431, LCO 3.0.4 is only applicable to entry into Mode 1, 2, 3, or 4, and to entry into specified conditions that occur in Mode 1, 2, 3, or 4. As applied to NUREG-1431, Specification 3.7.10, this provision permits commencement of irradiated fuel assembly movement with one CREFS train inoperable if either NUREG-1431, Specification 3.7.10, Action A or D is implemented, since NUREG-1431, LCO 3.0.4 is not applicable to movement of irradiated fuel assemblies.

Therefore, the proposed change to CNP TS 3.5.7.1, which will allow commencement of irradiated fuel assembly movement with one CREFS train inoperable if Action “d” is implemented, is consistent with NUREG-1431.

Consistency with Precedent Licensing Action

An amendment approved by the NRC in November 2002 for the Virgil C. Summer Nuclear Station (VCSNS) provides a precedent licensing action for the change proposed for CNP. The VCSNS amendment added an Action, similar to that proposed for CNP, to the VCSNS TS for the control room normal and emergency air handling system (which corresponds to the CREVS at CNP). The Action proposed for the CNP TS differs from that approved for VCSNS in that the proposed CNP Action explicitly limits the TS 3.0.4 exception to the movement of irradiated fuel. This explicit limitation will assure that the TS 3.0.4 exception is applied only to movement of irradiated fuel. The Applicability condition affected by the VCSNS amendment was "Modes 5 and 6," which corresponds to the Applicability condition affected by the proposed CNP change, "During movement of irradiated fuel assemblies." Although the applicability conditions differ, the underlying justification for VCSNS amendment applies to the change proposed for CNP:

- The associated Action statement for both the VCSNS and the CNP TS provides adequate assurance that the applicable limits of GDC 19 will be met regardless of whether the inoperability of the respective control room emergency ventilation system occurs before or after entering the Applicability condition.
- The change is consistent with the provisions of NUREG-1431 in that both the VCSNS and CNP Applicability conditions affected by the change are other than Mode 1, 2, 3, or 4.

Therefore, the proposed change to CNP TS 3.5.7.1 is consistent with the precedent licensing action approved for VCSNS.

5.0 Regulatory Safety Analysis

5.1 No Significant Hazards Consideration

I&M has evaluated whether or not a significant hazards consideration is involved with the proposed change by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated?

Response: No

Probability of Occurrence of an Accident Previously Evaluated -

CNP TS 3.0.4 requires that TS limiting conditions for operation be met without reliance on the Action statements prior to entering an Applicability condition. The proposed change to the CNP CREVS TS to allow an exception to TS 3.0.4 during movement of irradiated fuel assemblies does not affect any accident initiators or precursors. The CREVS function is purely mitigative. There is no design basis accident that is initiated by a failure of the CREVS function. An exception to TS 3.0.4 will not create any adverse interactions with other systems that could result in initiation of a design basis accident. Therefore, the probability of occurrence of an accident previously evaluated is not significantly increased.

Consequences of an Accident Previously Evaluated -

The accident consequence that is relevant to the proposed change is the dose to control room personnel from a fuel handling accident. The CNP licensing basis analysis of a fuel handling accident has determined that the dose would be within the applicable limits of GDC 19. The current TS specify actions to be taken if one CREVS pressurization train is inoperable during movement of irradiated fuel assemblies. These actions provide assurance that the CREVS will perform its mitigating function as assumed in the accident analysis. Since the proposed change will continue to require these actions, the fuel handling accident analysis will remain valid. Therefore, the consequences of an accident previously analyzed are not significantly increased.

In summary, the probability of occurrence and the consequences of an accident previously evaluated are not significantly increased.

2. Does the 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 create any new or different accident initiators or precursors. The option to commence movement of irradiated fuel assemblies while relying on the provisions of the Action statement does not affect the manner in which any accident begins. The proposed change does not create any new accident scenarios and does not change the interaction between the CREVS and any other system. Thus, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

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

Response: No

The margin of safety associated with the proposed change is that associated with the applicable control room dose limit specified by GDC 19. The proposed change will continue to require actions that assure the dose to control room personnel determined by the fuel handling accident analysis remains valid. Therefore, the proposed change does not involve a significant reduction in margin of safety.

In summary, based upon the above evaluation, I&M has concluded that the proposed change involves no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

5.2.1 Regulations

The regulation involved in the proposed change is 10 CFR 50 Appendix A, GDC 19. As described above, the proposed change does not affect the licensing basis fuel handling accident analysis that demonstrates compliance with the applicable GDC 19 limit.

5.2.2 UFSAR

The UFSAR sections involved with proposed change are Section 9.10, Unit 1 Section 14.2.1, and Unit 2 Section 14.2.1. These sections do not discuss the applicability of TS 3.0.4 and are, therefore, unaffected by the proposed change.

In conclusion, based on the considerations discussed above, (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.

6.0 Environmental Considerations

I&M has evaluated this license amendment request against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. I&M has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the

proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared concerning the proposed amendment.

8.0 References

1. NUREG-1431, Standard Technical Specifications Westinghouse Plants, Revision 2, dated June 2001
2. Letter from S. A. Byrne, U.S. NRC, to G. E. Edison, South Carolina Electric and Gas Company, "Virgil C. Summer Nuclear Station, Unit No. 1 - Issuance of Amendment re: Control Room Normal and Emergency Air Handling System – Exclusion of Technical Specification 3.0.4 Requirements from TS 3/4.7.6 in Modes 5 and 6 (TAC No. MB5203)," dated November 7, 2002
3. Letter from R. P. Powers, I&M, to U. S. NRC Document Control Desk, "License Amendment Request for Control Room Habitability and Generic Letter 99-02 Requirements," C0600-13, dated June 12, 2000
4. Letter from W. D. Reckley, NRC, to R. P. Powers, I&M, "Donald C. Cook Nuclear Plant, Units 1 and 2 – Issuance of Amendments (TAC Nos. MA9394 and MA9395)," dated November 13, 2001

ATTACHMENT 1A TO AEP:NRC:3075

TECHNICAL SPECIFICATIONS PAGES
MARKED TO SHOW PROPOSED CHANGE

REVISED PAGES
UNIT 1

3/4 7-19

3/4.7.5 CONTROL ROOM VENTILATION SYSTEM

CONTROL ROOM EMERGENCY VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.5.1 The control room emergency ventilation system (CREVS) shall be OPERABLE with:

- a. Two independent pressurization trains, and
- b. One charcoal adsorber/HEPA filter unit.

-----NOTE-----

The control room envelope/pressure boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, 3, 4, and during the movement of irradiated fuel assemblies.

ACTION:

MODES 1, 2, 3, and 4:

- a. With one pressurization train inoperable, restore the inoperable train to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the filter unit inoperable, restore the filter unit to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With two CREVS pressurization trains inoperable due to an inoperable control room envelope/pressure boundary, restore the control room envelope/pressure boundary to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

During the movement of irradiated fuel assemblies:

- d. With one pressurization train inoperable, restore the inoperable pressurization train to OPERABLE status within 7 days, or initiate and maintain operation of the remaining OPERABLE train in the pressurization/cleanup alignment.
- e. With any of the following: (1) both pressurization trains inoperable; (2) the filter unit inoperable; or (3) the control room envelope/pressure boundary inoperable, immediately suspend all operations involving the movement of irradiated fuel assemblies.

The provisions of Specification 3.0.4 are not applicable to movement of irradiated fuel assemblies.

ATTACHMENT 1B TO AEP:NRC:3075

TECHNICAL SPECIFICATIONS PAGES
MARKED TO SHOW PROPOSED CHANGE

REVISED PAGES
UNIT 2

3/4 7-14

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.7 PLANT SYSTEMS

3/4.7.5 CONTROL ROOM VENTILATION SYSTEM

CONTROL ROOM EMERGENCY VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.5.1 The control room emergency ventilation system (CREVS) shall be OPERABLE with:

- a. Two independent pressurization trains, and
- b. One charcoal adsorber/HEPA filter unit.

-----NOTE-----
The control room envelope/pressure boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, 3, 4, and during the movement of irradiated fuel assemblies.

ACTION:

MODES 1, 2, 3, and 4:

- a. With one pressurization train inoperable, restore the inoperable train to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the filter unit inoperable, restore the filter unit to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With two CREVS pressurization trains inoperable due to an inoperable control room envelope/pressure boundary, restore the control room envelope/pressure boundary to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

During the movement of irradiated fuel assemblies:

- d. With one pressurization train inoperable, restore the inoperable pressurization train to OPERABLE status within 7 days, or initiate and maintain operation of the remaining OPERABLE train in the pressurization/cleanup alignment.
- e. With any of the following: (1) both pressurization trains inoperable; (2) the filter unit inoperable; or (3) the control room envelope/pressure boundary inoperable, immediately suspend all operations involving the movement of irradiated fuel assemblies.

The provisions of Specification 3.0.4 are not applicable to movement of irradiated fuel assemblies

ATTACHMENT 2A TO AEP:NRC:3075

PROPOSED TECHNICAL SPECIFICATIONS PAGES

REVISED PAGES
UNIT 1

3/4 7-19

3/4.7.5 CONTROL ROOM VENTILATION SYSTEM

CONTROL ROOM EMERGENCY VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.5.1 The control room emergency ventilation system (CREVS) shall be OPERABLE with:

- a. Two independent pressurization trains, and
- b. One charcoal adsorber/HEPA filter unit.

-----NOTE-----

The control room envelope/pressure boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, 3, 4, and during the movement of irradiated fuel assemblies.

ACTION:

MODES 1, 2, 3, and 4:

- a. With one pressurization train inoperable, restore the inoperable train to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the filter unit inoperable, restore the filter unit to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With two CREVS pressurization trains inoperable due to an inoperable control room envelope/pressure boundary, restore the control room envelope/pressure boundary to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

During the movement of irradiated fuel assemblies:

- d. With one pressurization train inoperable, restore the inoperable pressurization train to OPERABLE status within 7 days, or initiate and maintain operation of the remaining OPERABLE train in the pressurization/cleanup alignment.
- e. With any of the following: (1) both pressurization trains inoperable; (2) the filter unit inoperable; or (3) the control room envelope/pressure boundary inoperable, immediately suspend all operations involving the movement of irradiated fuel assemblies.
- f. The provisions of Specification 3.0.4 are not applicable to movement of irradiated fuel assemblies.

Attachment 3 to AEP:NRC:3075

PROPOSED TECHNICAL SPECIFICATIONS PAGES

REVISED PAGES
UNIT 2

3/4 7-14

3/4.7.5 CONTROL ROOM VENTILATION SYSTEM

CONTROL ROOM EMERGENCY VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.5.1 The control room emergency ventilation system (CREVS) shall be OPERABLE with:

- a. Two independent pressurization trains, and
- b. One charcoal adsorber/HEPA filter unit.

-----NOTE-----

The control room envelope/pressure boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, 3, 4, and during the movement of irradiated fuel assemblies.

ACTION:

MODES 1, 2, 3, and 4:

- a. With one pressurization train inoperable, restore the inoperable train to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the filter unit inoperable, restore the filter unit to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With two CREVS pressurization trains inoperable due to an inoperable control room envelope/pressure boundary, restore the control room envelope/pressure boundary to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

During the movement of irradiated fuel assemblies:

- d. With one pressurization train inoperable, restore the inoperable pressurization train to OPERABLE status within 7 days, or initiate and maintain operation of the remaining OPERABLE train in the pressurization/cleanup alignment.
- e. With any of the following: (1) both pressurization trains inoperable; (2) the filter unit inoperable; or (3) the control room envelope/pressure boundary inoperable, immediately suspend all operations involving the movement of irradiated fuel assemblies.
- f. The provisions of Specification 3.0.4 are not applicable to movement of irradiated fuel assemblies.