Nuclear Operating Company

South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

March 18, 2004
NOC-AE-04001696
10CFR50.36
STI: 31711944

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

South Texas Project
Units 1 and 2
Docket Nos. 50-498 and 50-499
Request for Enforcement Discretion for Technical Specifications 3/4.7.7 and 3.8.1.1

In this letter, STP provides a follow-up written request for Enforcement Discretion, which was provided verbally at 1946 hours on March 17, 2004, for South Texas Project Units 1 and 2.

STP requests Enforcement Discretion for Units 1 and 2 from the provisions of Technical Specification 3/4.7.7, Control Room Makeup and Cleanup Filtration System, and Technical Specification 3.8.1.1, A.C. Sources Operating. STP is specifically making a one-time request for discretion from taking the actions required by

- Specification 3.7.7 ACTION c for Modes 1 – 4, and
- Specification 3.7.7 ACTION b for Modes 5 – 6

because Surveillance Requirement 4.7.7.e.3 is not met.

In addition, STP is specifically making a one-time request for discretion from taking the actions required by

- Specification 3.8.1.1 ACTION d

because the Control Room Makeup and Cleanup Filtration System is inoperable due to Surveillance Requirement 4.7.7.e.3 not being met.

ACTION c of Specification 3.7.7 and ACTION d of Specification 3.8.1.1 were entered at 1242 hours for both units on March 17, 2004. STP requests this discretion from the ACTION requirements to submit and allow time for approval of a license amendment on an exigent basis to bring the Control Room Makeup and Cleanup Filtration System back into compliance.

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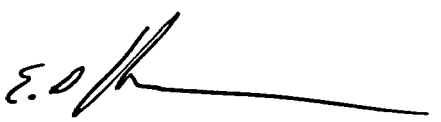
STP will submit a corresponding exigent license amendment request by March 19, 2004.

The requested discretion involves non-compliance with an action statement for which a follow-up license amendment must be processed as a one-time change or permanent change under exigent circumstances.

STP has determined the proposed enforcement discretion is not risk-significant and will not result in a net increase in the radiological risk. The attachment provides the required information for enforcement discretion as described in Part 9900 of the NRC Inspection Manual.

If you have any questions regarding this request, please contact Mr. S. M. Head at (361) 972-7136 or me at (361) 972-7849.



E. D. Halpin
Plant General Manager

jrm/
Attachments:

1. Criteria for Enforcement Discretion
2. Preliminary Tracer Gas Testing Results
3. Technical Specification Page Mark-ups
4. Differences between Oral and Written Enforcement Discretion Requests

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ATTACHMENT 1

Criteria for Enforcement Discretion

Criteria for Enforcement Discretion

1. **The Technical Specification or other license condition that will be violated:**

STP is specifically making a one-time request for discretion for both Units 1 and 2 from taking the actions required by ACTION c for Modes 1 – 4 and ACTION b for Modes 5 – 6 of specification 3.7.7 because Surveillance Requirement 4.7.7.e.3 is not met. In addition, STP is making a corresponding one-time request for discretion for both Units 1 and 2 from taking the actions required by ACTION d of Specification 3.8.1.1 because the Control Room Makeup and Cleanup Filtration System is inoperable due to Surveillance Requirement 4.7.7.e.3 not being met.

TS 3.8.1.1.d applies when a standby diesel generator (SDG) is inoperable and a required function on a different train that depends on its associated SDG for emergency power is also inoperable. In the case of this request for Enforcement Discretion, each respective train of CRHVAC depends on that train's SDG for emergency power. With a SDG inoperable concurrent with the inoperable CRHVAC, TS 3.8.1.1 would apply. Currently, Unit 2 SDG 22 is inoperable, and SDG 11 is inoperable due to planned maintenance on its associated load sequencer. Consequently, as stated above, STP requests the enforcement discretion include the application of TS 3.8.1.1 to this condition.

Specification 3.7.7 states:

> Three independent Control Room Makeup and Cleanup Filtration Systems shall be OPERABLE.

ACTION statement c (Modes 1 through 4) states:

> With three Control Room Makeup and Cleanup Filtration Systems inoperable, suspend all operations involving movement of spent fuel, and crane operation with loads over the spent fuel pool, and restore at least one system to OPERABLE status within 12 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

ACTION statement b (Modes 5 and 6) states:

> With more than one Control Room Makeup and Cleanup Filtration System inoperable, or with the OPERABLE Control Room Makeup and Cleanup Filtration Systems required to be in the recirculation and makeup air filtration mode by ACTION a. not capable of being powered by an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS, operations involving positive reactivity additions that could result in loss of required SHUTDOWN MARGIN or required boron concentration,

movement of spent fuel, and crane operations with loads over the spent fuel pool.

Surveillance Requirement 4.7.7.e.3 states:

Verifying that the system maintains the control room envelope at a positive pressure of greater than or equal to 1/8 inch Water Gauge at less that or equal to a pressurization flow of 2000 cfm relative to adjacent areas during system operation; and...

Specification 3.8.1.1 states:

As a minimum, the following A.C. electrical power sources shall be OPERABLE:

a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E Distribution System[(1)], and

b. Three separate and independent standby diesel generators, each with a separate fuel tank containing a minimum volume of 60,500 gallons of fuel.

ACTION statement 3.8.1.1.d states:

With one standby diesel generator inoperable in addition to ACTION b. or c. above, verify that:

1. All required systems, subsystems, trains, components, and devices that depend on the remaining OPERABLE diesel generator as a source of emergency power are also OPERABLE, and

If these conditions are not satisfied within 24 hours be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

STP Units 1 and 2 are currently in MODE 1 at 100% power. At least one train of Control Room ventilation in each unit must be returned to OPERABLE status by 0042 hours on March 18, 2004, or the units must be in COLD SHUTDOWN within the following 36 hours. STP requests discretion from taking the actions required if surveillance requirement 4.7.7.e.3 is not met until a license amendment request can be approved. This exigent license amendment request will be submitted by March 19, 2004.

2. The circumstances surrounding the situation, including root causes, the need for prompt action and identification of any relevant historical events.

On March 6, 2004, STP completed testing to verify inleakage into the Unit 1 control room envelope in accordance with Generic Letter 2003-01, "Control Room Habitability." The testing method used was the Component Test Method described in NEI 99-03, "Control Room Habitability Guidance." This test measures the pressure inside the control room envelope with respect to adjacent areas in a series of locations such that the test points represent the control room boundary. The test is conducted to verify that the pressure within the control room envelope with respect to adjacent areas is positive so that any leakage across the boundary should be outleakage. It can then be concluded that no inleakage exists across the boundary. The test results from the Component Test Method were planned to be compared to the test results from the Tracer Gas Test Method to validate that the Component Test Method is a valid test for determining control room envelope inleakage. The comparison of these two test methods is endorsed in NRC Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors."

The Component Test Method is a more comprehensive test than the Technical Specification surveillance to verify that the control room ventilation system can maintain a positive pressure with respect to adjacent areas. The test is performed with only two trains of the control room ventilation system in the emergency pressurization and cleanup filtration mode of operation. Since STP has three 50 percent capacity ventilation trains, the test is performed three times to include each of the possible two train HVAC combinations (i.e., A-B train, A-C train, and B-C train). The Component Test measures 100 points in each of three train combinations (300 total test points), whereas the Technical Specification surveillance tests measures 24 points in each of three train configurations (total of 72 points).

During the performance of the Component Test, 6 of 300 points tested (total of all three train combinations) did not meet the test acceptance criterion (i.e., 0.125 inches water gauge (in wg) relative pressure). However, all points tested were positive with respect to adjacent areas. These six points were not points measured by the Technical Specification surveillance procedure. The control room ventilation system is designed to maintain the control room 0.125 in wg positive pressure relative to adjacent areas when aligned in the pressurization and cleanup filtration mode of operation. The six test points less than 0.125 in wg are degraded conditions. This condition will be corrected under the 10 CFR 50, Appendix B corrective action process. The positive pressure condition from the Component Test demonstrates that there is no unfiltered inleakage across these test points.

The apparent cause of the failed test points is an air balancing issue. Air balancing is a complex, time-consuming activity. Air balancing is expected to be part of the corrective action to resolve the degraded condition.

STP completed tracer gas testing in Unit 1 on March 13, 2004, to validate inleakage. The preliminary tracer gas test results are provided in Attachment 2.

STP had earlier performed a Component Test in Unit 2 in February and March 2003. During the performance of the Unit 2 test, 7 of 300 points tested were found to not meet the test acceptance criterion (i.e., 0.125 in wg relative pressure). These test points were positive with respect to adjacent areas. The failed test points were not points measured by the Technical Specification surveillance.

NRC Generic Letter 2003-01, dated June 12, 2003, requested that licensees provide confirmation of their design inleakage into their control room by testing. The Generic Letter acknowledged that licensee's existing Technical Specification surveillance requirements may not be adequate to meet their design bases. The Generic Letter stated that if a licensee determines that their technical specification differential pressure surveillance requirement is no longer adequate to verify inleakage, then the licensee should provide a schedule for revising the technical specification surveillance requirement.

STP responded to Generic Letter 2003-01 by stating that a Component Test and a Tracer Gas Test would be performed in one unit's control room to verify inleakage assumptions. STP also responded to Generic Letter 2003-01 that in light of Tracer Gas test results, inleakage testing appears to be the best method to confirm boundary integrity. STP committed to submit a Technical Specification change to include periodic verification of control room inleakage within 90 days after TSTF-448, "Control Room Habitability," is published in the Federal Register as available for use by licensees. The changes proposed by TSTF-448 include a surveillance requirement for inleakage testing. TSTF-448 is currently in draft form by the industry and has received NRC comments. The industry members of the TSTF are working on revising TSTF-448 to gain NRC approval.

The testing during the weeks of March 1 and 8, 2004, in Unit 1 was conducted to provide the information requested by Generic Letter 2003-01. Additionally, similar testing was performed in Unit 2 during February and March 2003. STP will submit an exigent license amendment request, which will propose changes to bring the Control Room Makeup and Cleanup Filtration System back into compliance, by March 19, 2004.

The control room envelope pressure remains positive with respect to adjacent areas under the current degraded condition. In STP's current condition, no increase in unfiltered inleakage should occur since the differential pressure remains positive within the control room envelope with respect to adjacent areas. The Unit 1 and Unit 2 control room ventilation systems maintain their design function to minimize inleakage with a reduced differential pressure margin at some locations (i.e., six locations in Unit 1 and seven locations in Unit 2).

3. **The safety basis for the request, including an evaluation of the safety significance and potential consequences of the proposed course of action. This evaluation should include at least a qualitative risk assessment using both risk insights and informed judgements, as appropriate.**

The Control Room (CR) ventilation system consists of three 50% trains, which are designed to: [Reference: UFSAR Section 9.4.1.1]

a. Assure habitability of the CR envelope and permit safe shutdown of the plant as may be required under any normal or emergency conditions.

b. Maintain ambient temperature conditions to provide operator comfort and to satisfy environmental requirements of equipment. The design bases of ambient conditions, safety class, and seismic category are listed in UFSAR Table 9.4-1 and Section 3.2.

c. Maintain the CR envelope at positive pressure to minimize any inleakage of possible contamination from the outside.

d. Satisfy the design requirements of limiting dose to CR operators following the Design Basis Accident (DBA) in accordance with General Design Criterion (GDC) 19 of 10 CFR 50 Appendix A.

The function of the Control Room ventilation system in its emergency mode lineup is to maintain a positive pressure within the envelope with respect to adjacent areas in order to minimize unfiltered inleakage. This assures that the radiological dose to the control room operator remains within the limits of GDC 19 of 10 CFR 50, Appendix A.

The Control Room envelope for each unit remains at a positive pressure with respect to adjacent areas in the current degraded condition. The Control Room pressure meets acceptance criteria (i.e., 0.125 in wg positive) in all locations tested with the exception of a limited number of points described above. The relative pressure across these locations remains positive relative to adjacent areas. Although not meeting Technical Specification acceptance criteria, the positive relative pressure condition still assures that any leakage across these boundary locations would be outleakage. Therefore, the functionality of the Control Room ventilation system is maintained with the degraded relative pressure condition for portions of the envelope. The analyzed radiological dose to the Control Room operator remains unaffected by this condition. Therefore, the consequences of this condition remain consistent with the licensing basis analyses.

The results of the Component Test and those of the Tracer Gas Test demonstrate that STP is essentially a zero inleakage control room envelope. The dose limits of GDC 19 of 10 CFR 50, Appendix A are met. Therefore, the design safety function of the control room ventilation system is met.

The STP PRA models the cooling function of the Control Room ventilation system. This function maintains environmental conditions that ensure the continued operation of safeguards relay racks, solid state protection, etc. and the Control Room environment. The pressurization function of the Control Room ventilation system is not modeled in the PRA for the reasons described below.

Control Room pressurization does not affect equipment operation or Control Room operator response during a plant initiating event, and does not affect the progression of a potential accident sequence up to the point of core damage. With no core damage, the Control Room pressurization function is not necessary. If core damage occurs and if the accident does not lead to a large early release, a non-functioning Control Room pressurization system could potentially change operator response models and affect other release categories. A functional Control Room pressurization system minimizes this potential.

Because the Control Room pressurization system remains functional, there is no risk impact associated with the current status of the Control Room pressurization system.

It is STP's position that the Control Room ventilation system remains functional and continues to provide protection to the Control Room operators. Therefore the safety significance of the current condition is negligible. In addition, STP has evaluated the proposed compensatory actions and the avoided risk that would be associated with the shutdown transient and determined that they are adequate to offset the risk associated with the degraded Control Room ventilation system. Based on the above, a one-time extension for discretion from the actions required when Surveillance Requirement 4.7.7.e.3 is not met is not significant to plant safety and will not result in a net increase in radiological risk.

4. **The justification for the duration of the noncompliance.**

Although the degraded pressure condition represents a noncompliance with a Technical Specification surveillance acceptance criterion, the condition does not represent a vulnerability to unfiltered inleakage.

The Control Room ventilation system in Unit 1 and Unit 2 is functioning to minimize inleakage. The system meets the makeup airflow requirements and the positive pressure requirements in all surveillance areas except those described above. The exceptions are not attributed to a degraded control room HVAC system or boundary, but instead to an air balancing condition that resulted in these areas within the envelope not being at the design differential pressure with respect to adjacent areas. The degraded pressure condition should not result in any increase in inleakage since it remains positive with respect to adjacent areas. The design function of the control room ventilation system continues to be met.

The enforcement discretion allows for submittal and approval of a license amendment under

exigent conditions without an unnecessary thermal transient (shutdown) on the units.

5. **The basis for the licensee's conclusion that the noncompliance will not be of potential detriment to the public health and safety and that no significant hazard consideration is involved.**

   a. The proposed Enforcement Discretion does not involve a significant increase in the probability or consequences of a previously evaluated accident. As discussed in Section 3 above, there are no significant safety concerns resulting from the proposed Enforcement Discretion. The Control Room ventilation system has no significant role as a potential accident initiator in the current plant Mode. The Control Room ventilation system continues to remain functional and provides positive pressure with respect to adjacent areas. The test results demonstrate that the operator dose limits of General Design Criterion 19 of 10 CFR 50, Appendix A are met.

   b. The proposed Enforcement Discretion does not create the possibility of a new or different accident from any previously evaluated. No new accident precursors have been created due to the degraded condition of the control room envelopes. The Control Room ventilation system continues to remain functional and provides positive pressure with respect to adjacent areas and to limit inleakage so that the operator dose limits of General Design Criterion 19 of 10 CFR 50, Appendix A are met.

   c. The proposed Enforcement Discretion does not involve a significant reduction in the margin of safety. The Control Room ventilation system remains functional and continues to provide positive pressure with respect to adjacent plant areas. The proposed condition of the plant meets the operator dose limits of General Design Criterion 19 of 10 CFR 50, Appendix A.

   Based on the above, the proposed changes will not be of potential detriment to the public health and safety and no significant hazards consideration is involved.

6. **The basis for the licensee's conclusion that the noncompliance will not involve adverse consequences to the environment.**

   STP has reviewed the proposed Enforcement Discretion request and the Nuclear Regulatory Commission Final Environmental Assessment for the South Texas Project Units 1 and 2 and has concluded that pursuant to 10 CFR 51, there are no significant radiological or non-radiological impacts associated with the proposed Enforcement Discretion request.

   This proposed Enforcement Discretion request has been evaluated against the criteria for and identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed changes meet the criteria for categorical exclusion as provided for under 10CFR51.22(c)(9). The following is a discussion of how the proposed Enforcement Discretion request meets the criteria for categorical exclusion.

   (i) The proposed change involves no Significant Hazards Consideration (refer to Section 5 above),

(ii) there is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite since the proposed changes do not affect the generation of any radioactive effluent nor do they affect any of the permitted release paths, and

(iii) there is no significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9). Based on the aforementioned and pursuant to 10CFR51.22(b), no environmental assessment or environmental impact statement need be prepared.

7. **Any proposed compensatory measure(s).**

The following compensatory actions will be in effect until the Control Room ventilation system is restored to OPERABLE status:

In preparation for the unfiltered in-leakage tests using the tracer gas methodology, STP performed analysis which would support continued operation with up to 80 cfm unfiltered in-leakage into the control room envelope with a 50 rem thyroid limit following the guidance of NRC Regulatory Guide 1.195, "Methods and Assumptions for Evaluating Radiological Consequences of Design Basis Accidents at Light-Water Nuclear Power Reactors." For unfiltered in-leakage values between 80 and 1240 cfm, potassium iodide (KI) would provide adequate protection to keep operator doses below 50 rem thyroid. For any conceivable unfiltered in-leakage amount above 1240 cfm, use of self-contained breathing apparatus (SCBA) would provide adequate protection to keep operator doses below 50 rem thyroid.

KI is available to the Control Room crews. Furthermore, SCBA units are staged and ready for use by Control Room personnel. STP's emergency plan implementing procedures require that personnel radiation exposure in the control room be monitored so that appropriate personnel protective measures will be taken by the operators during accident conditions.

For the duration of this enforcement discretion, any evaluation taking credit for the compensatory measures discussed above will ensure that the dose limits of GDC 19 of 10 CFR 50 Appendix A are met, including limiting the thyroid dose to 30 rem.

8. **A statement that the request has been approved by the facility organization that normally reviews safety issues (Plant On-site Review Committee, or its equivalent).**

The Plant Operations Review Committee has approved the content of this request.

9. The request must specifically address which of the NOED criteria for appropriate plant conditions specified in Section B is satisfied and how it is satisfied.

The NOED criteria for an operating plant are applicable in this situation. The criteria and associated justification are as follows:

a. *Avoid unnecessary transients as a result of compliance with the license condition and, thus, minimize potential safety consequences and operational risks*

Requiring the plant to shutdown and put the systems through the resulting transient and thermal cycle is not commensurate with the low safety significance of this condition. Since the control room ventilation system meets its design safety function, there is no safety benefit from requiring completion of the shutdown and the shutdown transient.

10. If a follow-up license amendment is required, the written NOED request must include marked-up TS pages showing the proposed TS changes. Both the written NOED request and the license amendment request must be submitted within 2 working days. The license amendment request must describe and justify the exigent circumstances (see 10 CFR 50.91(a)(6)).

A follow-up license amendment request will be submitted by March 19, 2004. Mark-ups of the proposed changes to TS 3/4.7.7 are provided in Attachment 3.

11. For NOEDs involving severe weather or other natural events.

The requested enforcement discretion does not involve severe weather or other natural events.

ATTACHMENT 2

Preliminary Tracer Gas Testing Results

Preliminary Tracer Gas Test Results

The following is a summary of the preliminary inleakage test results from tracer gas testing performed in Unit 1 from March 10 – 13, 2004. The final test results will be presented in the test contractor's report. The uncertainty is approximately ± 70 cfm. Regulatory Position 1.4 of NRC Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," states that if the control room envelope has been demonstrated to have low in-leakage, the uncertainty in the inleakage calculation may be an artifact of the calculations and not representative of the control room envelope's integrity. Therefore, it is optional to include the uncertainty for facilities that demonstrate a CRE in-leakage less than 100 cfm. Based on the consistent low in-leakage results for the three valid tests performed, STP concludes that the uncertainty is an artifact of the calculation and should not be included in the test results.

Train Combination	Date Performed	Inleakage Results
A-B	3/10	9.6 cfm (Note 1)
A-C	3/11	-2.3 cfm
B-C	3/12	2.0 cfm
A-B	3/13	66.1 cfm (Note 2)

The purpose of this test was to confirm inleakage in the absence of ingress and egress into the control room envelope. STP's accident analyses (Standard Review Plan 6.4) assumes 10 cfm for ingress and egress during accident conditions.

Note 1: During performance of the test in the A-B train combination on March 10th, the Control Room envelope was breached approximately every 20 minutes to enter the Train B Control Room envelope ventilation equipment room to take an air sample. As a result, a change was made during the remaining tests that allowed taking air samples without entering the Train B Control Room envelope ventilation equipment room. After reviewing the testing results on March 11th and 12th, the 9.6 cfm indicated inleakage during the first time of testing was due to Control Room envelope ingress and egress, and testing limitations.

Note 2: The A-B train combination test was repeated during the evening of March 13th to remove the need to enter the Control Room envelope for test sampling as explained in Note 1 above. While the testing was in progress it was determined that the inleakage results during the evening of March 13th were considerably higher than the previous night's testing. Investigation found that a response to an unrelated plant condition necessitated frequent entries into the Control Room envelope. This test was

considered invalid because it was not conducted under static conditions to determine Control Room inleakage in the absence of Control Room envelope ingress and egress.

Conclusion: STP is essentially a zero inleakage Control Room envelope. Therefore, the test results are consistent with our design bases and GDC 19 criteria.

ATTACHMENT 3

Technical Specification Page Mark-ups

PLANT SYSTEMS

3/4.7.7 CONTROL ROOM MAKEUP AND CLEANUP FILTRATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.7 Three independent Control Room Makeup and Cleanup Filtration Systems shall be OPERABLE.

APPLICABILITY: All MODES.

ACTION:

MODES 1, 2, 3, and 4:

a. With one Control Room Makeup and Cleanup Filtration System inoperable, restore the inoperable system 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 two Control Room Makeup and Cleanup Filtration Systems inoperable, restore at least two systems to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

c. With three Control Room Makeup and Cleanup Filtration Systems inoperable, suspend all operations involving movement of spent fuel, and crane operation with loads over the spent fuel pool, and restore at least one system to OPERABLE status within 12 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

MODES 5 and 6:

a. With one Control Room Makeup and Cleanup Filtration System inoperable, restore the inoperable system to OPERABLE status within 7 days or initiate and maintain operation of the remaining OPERABLE Control Room Makeup and Cleanup Filtration Systems in the recirculation and makeup air filtration mode, or suspend all operations involving CORE ALTERATIONS, operations involving positive reactivity additions that could result in loss of required SHUTDOWN MARGIN or required boron concentration, movement of spent fuel, and crane operation with loads over the spent fuel pool.

b. With more than one Control Room Makeup and Cleanup Filtration System inoperable, or with the OPERABLE Control Room Makeup and Cleanup Filtration Systems required to be in the recirculation and makeup air filtration mode by ACTION a. not capable of being powered by an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS, operations involving positive reactivity additions that could result in loss of required SHUTDOWN MARGIN or required boron concentration, movement of spent fuel, and crane operations with loads over the spent fuel pool.

SURVEILLANCE REQUIREMENTS

4.7.7 Each Control Room Makeup and Cleanup Filtration System shall be demonstrated OPERABLE:

a. At least once per 12 hours by verifying that the control room air temperature is less than or equal to 78°F;

b. At least once per 92 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers of the makeup and cleanup air filter units and verifying that the system operates for at least 10 continuous hours with the makeup filter unit heaters operating;

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

c. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the system by:

1) Verifying that the makeup and cleanup systems satisfy the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% for HEPA filter banks and 0.10% for charcoal adsorber banks and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 6000 cfm ± 10% for the cleanup units and 1000 cfm ± 10% for the makeup units;

2) Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon," for a methyl iodide penetration of less than 1.0% when tested at a temperature of 30°C and a relative humidity of 70%; and

3) Verifying a system flow rate of 6000 cfm ± 10% for the cleanup units and 1000 cfm ± 10% for the makeup units during system operation when tested in accordance with ANSI N510-1980.

d. After every 720 hours of charcoal adsorber operation, by verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989 for a methyl iodide penetration of less than 1.0% when tested at a temperature of 30°C and a relative humidity of 70%.

e. At least once per 18 months by:

1) Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6.1 inches Water Gauge for the makeup units and 6.0 inches Water Gauge for the cleanup units while operating the system at a flow rate of 6000 cfm ± 10% for the cleanup units and 1000 cfm ± 10% for the makeup units;

2) Verifying that on a control room emergency ventilation test signal (High Radiation and/or Safety Injection test signal), the system automatically switches into a recirculation and makeup air filtration mode of operation with flow through the HEPA filters and charcoal adsorber banks of the cleanup and makeup units;

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

3) Verifying that the system maintains the control room envelope at a positive pressure of greater than or equal to 1/8 inch Water Gauge at less ~~that~~ **than** or equal to a pressurization flow of 2000 cfm relative to adjacent areas during system operation **(1)**, and

4) Verifying that the makeup filter unit heaters dissipate 4.5 ± 0.45 kW when tested in accordance with ANSI N510-1980.

f. After each complete or partial replacement of a HEPA filter bank, by verifying that the HEPA filter bank satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 for a DOP test aerosol while operating the system at a flow rate of 6000 cfm ± 10% for the cleanup units and 1000 cfm ± 10% for the makeup units; and

g. After each complete or partial replacement of a charcoal adsorber bank, by verifying that the charcoal adsorber bank satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.10% in accordance with ANSI N510-1980 for a halogenated hydrocarbon refrigerant test gas while operating the system at a flow rate of 6000 cfm ± 10% for the cleanup units and 1000 cfm ±10% for the makeup units.

(1) Measured points at a positive pressure but less than 1/8 inch Water Gauge are acceptable if an evaluation, considering appropriate compensatory action, demonstrates that the condition meets the requirements of GDC-19. The provisions of this note expire at 0800 on September 19, 2005.

ATTACHMENT 4

Differences between Oral and Written Enforcement Discretion Requests

Differences between 03/17/2004 Oral and Follow-up Written Enforcement Discretion Requests

Section	Description of Change
Attachment 1, General	Renumbered and relocated Sections in Attachment 1 to be consistent with 11/02/2001 Part 9900 NOED format and content guidance.
Attachment 1, Section 1	Clarified that enforcement discretion request is for both Units 1 and 2.
Attachment 1, Section 1	Clarified that Standby Diesel Generator 11 is inoperable at the time of the enforcement discretion request.
Attachment 1, Section 2	Added clarification as to the number of test points for the Component Test method versus the Technical Specification surveillance test.
Attachment 1, Section 3	PRA insights were clarified to provide more detail on how Control Room ventilation system is modeled in the STP PRA, and the ability to provide protection to the Control Room operators.
Attachment 1, Section 5	As a result of discussions regarding clarification of PRA insights in Attachment 1 Section 3, Part c (margin of safety) of the No Significant Hazards Consideration will not address the PRA.
Attachment 1, Section 6	Discussion wording was replaced with categorical exclusion statement.
Attachment 1, Section 7	As discussed with the staff in follow-up discussions, proposed compensatory measures will include ensuring that evaluations will limit acceptable thyroid dose to 30 rem.
Attachment 3	As discussed in the enforcement discretion request teleconference, and in subsequent discussions with the NRC staff, the proposed change to Surveillance Requirement 4.7.7.e.3 will specify that measured points must be positive relative pressure, and the provisions of the requested change will expire on September 19, 2005 .
Attachment 4	Added Attachment 4 as aid to reviewers.