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DTE Energy



10 CFR 50.90

July 30, 2004
NRC-04-0043

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D C 20555-0001

- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) Detroit Edison Letter to NRC, "Proposed License Amendment for the Revision of Control Room Emergency Filtration System Technical Specification Surveillance Requirements Regarding Unfiltered Inleakage," NRC-02-0072, dated September 26, 2002
 - 3) Detroit Edison Letter to NRC, "Proposed License Amendment for the Implementation of Alternative Radiological Source Term Methodology," NRC-03-0007, dated February 13, 2003
 - 4) Detroit Edison Letter to NRC, "Resubmittal of Proposed License Amendment for the Revision of Control Room Emergency Filtration System Technical Specification Surveillance Requirements Regarding Unfiltered Inleakage," NRC-03-0016, dated March 31, 2003
 - 5) Detroit Edison Letter to NRC, "Special Report of Debonded and Damaged Control Center Heating, Ventilation, and Air Conditioning (CCHVAC) Duct Sealant," NRC-96-0012, dated January 23, 1996
 - 6) Detroit Edison Letter to NRC, "Detroit Edison's 60-Day Response to Generic Letter 2003-01, "Control Room Habitability,"" NRC-03-0060, dated August 11, 2003
 - 7) Detroit Edison Letter to NRC, "Proposed License Amendment for the Deferral of Control Room Emergency Filtration System Technical Specification Surveillance Requirement 3.7.3.6", NRC-03-0064, dated October 10, 2003

A001
A003

Subject: Proposed License Amendment for the Addition of a License Condition and Deletion of Control Room Emergency Filtration System Technical Specification Surveillance Requirement 3.7.3.6

Pursuant to 10 CFR 50.90, Detroit Edison proposes to amend Facility Operating License NPF-43 to add License Condition 2.C.(22) requiring an integrated tracer gas test of the Control Room Envelope (CRE) using methods described in American Society for Testing and Materials (ASTM) E741-00, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution," and to delete Surveillance Requirement (SR) 3.7.3.6, which requires verification that unfiltered inleakage from Control Room Emergency Filtration (CREF) system duct work outside the Control Room Envelope (CRE) is within limits.

Detroit Edison has followed the control room habitability issue closely over the last several years. We have monitored other utilities' Alternate Source Term (AST) and Technical Specification (TS) change submittals, and have noted their tracer gas test results. In References 2 and 4, we requested that Fermi 2 be allowed to perform a tracer gas test of the CRE in lieu of performing SR 3.7.3.6. We also proposed in Reference 3 a license amendment to revise the loss of coolant accident (LOCA) analysis using alternate source term (AST) methodology. Detroit Edison has responded to Generic Letter 2003-01, "Control Room Habitability", (Reference 6) and is continuing to address issues associated with Control Room Habitability.

As Detroit Edison monitored these issues and prepared the submittals noted above, it has become apparent that the safety benefits of conducting testing currently required by SR 3.7.3.6 are minimal and that sufficient basis exists for eliminating the requirement entirely. It should be noted Detroit Edison has been granted a deferral of TS SR 3.7.3.6 (Reference 7) until Refueling Outage 10 (RF-10), scheduled to start November 6, 2004. Performing SR 3.7.3.6 during RF-10 is not desirable due to the length of time the CREF system would not be available for refueling activities. Several days are required to perform the testing.

In Reference 6, Detroit Edison's 60-Day Response to Generic Letter 2003-01, "Control Room Habitability," we indicated that information confirming CRE unfiltered inleakage will be provided in response to Generic Letter 2003-01 no later than December 9, 2004. However, as discussed in this letter, it is anticipated that the baseline integrated test of the CRE would now be performed in the first quarter of 2005; therefore, information would not be available to support the December 9, 2004 date. This test will be performed no later than March 31, 2005. Receipt of the final contractor report of the test results and preparation of the submittal will be completed within approximately 60 days. Therefore, these results and the remaining information requested by Generic Letter 2003-01, "Control Room Habitability," will be provided by May 31, 2005.

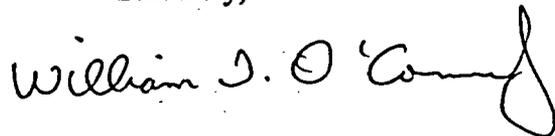
Attachment 1 provides a detailed description and an evaluation to support the new License Condition and requested deletion of SR 3.7.3.6. Attachment 2 provides the evaluation performed in accordance with 10 CFR 50.92(c), which concludes that no significant hazard is involved. Attachment 3 provides a marked-up as well as a typed version of the proposed Technical Specification change. Attachment 4 is an information only version of the Technical Specification Bases change supporting this amendment request.

Detroit Edison has reviewed the proposed changes against the criteria of 10 CFR 51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor do they significantly change the types or significantly increase the amounts of effluents that may be released offsite. The proposed changes do not significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, Detroit Edison concludes that the proposed changes meet the criteria provided in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement or an Environmental Assessment.

Detroit Edison requests NRC approval of this license amendment by September 30, 2004, with an implementation period of within 60 days following NRC approval. The requested approval date will allow timely planning for the upcoming refueling outage. Approval of the elimination of SR 3.7.3.6 as proposed in this submittal would negate the need for the changes requested in References 2 and 4. Therefore, this submittal supersedes the license amendment request of References 2 and 4. Detroit Edison intends to request removal of the License Condition upon resolution of generic industry issues associated with periodic control room habitability testing and the associated TS changes (TSTF-448).

Should you have any questions or require additional information, please contact Mr. Norman K. Peterson of my staff at (734) 586-4258.

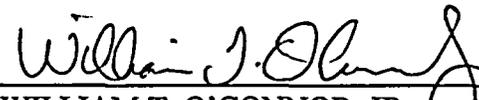
Sincerely,



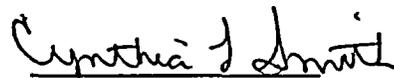
Attachments

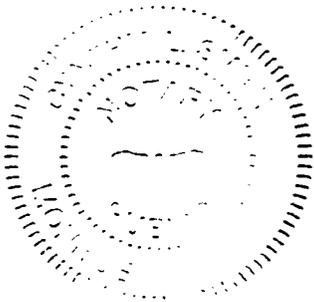
cc: D. P. Beaulieu
E. R. Duncan
NRC Resident Office
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

I, WILLIAM T. O'CONNOR, JR., do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.


WILLIAM T. O'CONNOR, JR.
Vice President - Nuclear Generation

On this 30 day of July, 2004 before me personally appeared William T. O'Connor, Jr., being first duly sworn and says that he executed the foregoing as his free act and deed.


Notary Public



CYNTHIA L. SMITH
Notary Public, Monroe County, MI
My Commission Expires Oct. 5, 2005

**ATTACHMENT 1 TO
NRC-04-0043**

**FERMI 2 NRC DOCKET NO. 50-341
OPERATING LICENSE NO. NPF-43**

**PROPOSED LICENSE AMENDMENT TO ADD A LICENSE CONDITION AND
ELIMINATE TECHNICAL SPECIFICATION SR 3.7.3.6**

DESCRIPTION AND EVALUATION

DESCRIPTION AND EVALUATION OF THE PROPOSED CHANGE

A. Summary of the Proposed Change

Detroit Edison proposes to add License Condition 2.C.(22) to require integrated tracer gas test of the Control Room Envelope (CRE) using methods described in American Society for Testing and Materials (ASTM) E741-00, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution." This testing will ensure operability of the Control Room Emergency Filtration (CREF) system by verifying inleakage is maintained below assumed limits. Tracer gas testing will provide a measurement of the CRE inleakage from all potential sources and not just those sources monitored by Technical Specification (TS) Surveillance Requirement (SR) 3.7.3.6.

Proposed License Condition 2.C.(22):

DECo shall perform an integrated tracer gas test to measure Control Room inleakage using methods described in ASTM E741-00, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution." This test will be performed by March 31, 2005. Further periodic assessments and testing will be performed in accordance with the guidance provided in NRC Regulatory Guide 1.197, (May 2003) "Demonstrating Control Room Envelope Integrity At Nuclear Power Reactors," Section D, Implementation, using the six year cycle described. In accordance with the Regulatory Guide, a self assessment will be performed after three years and a periodic test after 6 years.

The date selected for the License Condition is influenced by Fermi's upcoming refueling outage. Planning and scheduling for the outage, which is scheduled to start November 6, 2004, and contractor availability, prevents performance of the testing before Refueling Outage 10. Upon resumption of full power operation, when any unanticipated factors associated with recovering from the outage have been resolved, scheduling for the tracer gas testing can occur. Taking into account contractor availability and Fermi's own 13 week maintenance scheduling requirements as well as system outage planning and a margin for contingencies, Fermi commits to performing the on-line integrated tracer gas testing by March 31, 2005. Further periodic assessments and testing will be performed in accordance with the guidance provided in NRC Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity At Nuclear Power Reactors." This would entail conducting a self assessment after three years and performing a periodic test after six years as described in Regulatory Guide 1.197.

Tracer gas testing provides a reliable and comprehensive method of determining CRE inleakage. Technical Specification 3.7.3, "Control Room Emergency Filtration (CREF) System," SR 3.7.3.6, requires verifying that unfiltered inleakage from those CREF system duct work sections outside the Control Room Envelope (CRE), at negative pressure during accident conditions, are

within limits. This SR is required to be performed every 36 months, and can be performed only when the CREF system is not required to be Operable (i.e., in MODES 4 or 5, with no operations with a potential for draining the reactor vessel (OPDRV's)). Detroit Edison proposes to permanently delete SR 3.7.3.6 from the Technical Specifications and replace it with the requirement to perform tracer gas testing. In addition to performing tracer gas testing, two other TS surveillance tests will continue to provide adequate assurance of the integrity of the CRE.

In view of the proposed License Condition to perform tracer gas testing and the remaining Surveillance Requirements, which adequately ensure the integrity of the CREF system, Detroit Edison believes that there is no significant safety benefit in continuing to perform the test required by SR 3.7.3.6.

B. Basis for the Current Requirement

Surveillance Requirement 3.7.3.6 was introduced into the TS by License Amendment No. 88, issued on October 15, 1992. This amendment deleted License Condition 2.C.(7) which was included in the Fermi 2 operating license during the original licensing of the plant. This License Condition resulted from NRC concerns regarding the use of silicone sealant material to seal the joints on the CREF duct work outside the control room. A periodic visual inspection of silicone sealant on accessible portions of CREF system ductwork outside the control room that are at negative pressure during accident conditions (SR 3.7.3.3) was also added by License Amendment No. 88. The qualified life of the silicone sealant is specified as 40 years. Based on this 12 month Frequency for visually inspecting the silicone sealant (SR 3.7.3.3), and considering both the qualified life of the silicone sealant (40 years), and the difficulty in obtaining the plant conditions necessary to perform the test (i.e., shutdown for several days), a frequency of every other refueling outage (36 months) was chosen for performing SR 3.7.3.6.

In addition to the above, SR 3.7.3.5 requires verifying that each CREF subsystem can maintain a positive pressure of greater than or equal to 0.125 inches water gauge relative to the outside during the recirculation mode of operation at a makeup flow rate of less than or equal to 1800 cfm.

C. Evaluation of the Proposed Changes

Detroit Edison proposes to add License Condition 2.C.(22) to require integrated tracer gas testing of the Control Room Envelope using methods described in American Society for Testing and Materials (ASTM) E741-00, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution". This testing will ensure operability of the Control Room Emergency Filtration (CREF) system by verifying inleakage is maintained below assumed limits. Tracer gas testing will provide a measurement of the CRE inleakage from all potential sources and not just those sources monitored by TS SR 3.7.3.6.

Proposed License Condition 2.C.(22):

DECo shall perform an integrated tracer gas test to measure Control Room inleakage using methods described in ASTM E741-00, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution." This test will be performed by March 31, 2005. Further periodic assessments and testing will be performed in accordance with the guidance provided in NRC Regulatory Guide 1.197, (May 2003) "Demonstrating Control Room Envelope Integrity At Nuclear Power Reactors," Section D, Implementation, using the six year cycle described. In accordance with the Regulatory Guide, a self assessment will be performed after three years and a periodic test after 6 years.

The CREF system provides a radiologically controlled environment from which the plant can be safely operated following a radiological accident. Upon sensing conditions that could result in radiation exposure to control room personnel, the system automatically switches to the recirculation mode of operation to prevent infiltration of contaminated air into the control room. SR 3.7.3.6 was intended to verify maintenance of the accident analysis assumptions concerning unfiltered inleakage through the CREF system duct work outside the CRE that would be under negative pressure during accident conditions. The acceptance criteria for the cumulative total inleakage for all four ducts affected by this SR, under the two limiting scenarios for the design basis accident analyses, are 11 and 34 cfm, respectively. Performing tracer gas testing will provide reliable and comprehensive results regarding CRE inleakage.

There is no significant safety benefit in continuing to perform the test required by SR 3.7.3.6. This surveillance has been performed three times since it was added to the TS in 1992. The results of these three tests are as follows:

Test Date or Acceptance Criteria	Leak Rate (cfm) No Damper Failure	Leak Rate (cfm) Single Damper Failure
July 1994	3.92	10.91
October 1997	6.49	13.56
April 2000	5.82	13.43
Acceptance Criteria	11.00	34.00

As can be seen from the data, SR 3.7.3.6 has been performed successfully every time, with considerable margin to the acceptance criteria.

Additionally, performance of SR 3.7.3.6 is difficult to schedule, requires coordination of multiple organizations, up to 10 days to prepare and perform, and is very intrusive to the CREF system. The CREF ducts are tested in accordance with ANSI/ASME N510 1989, using the pressure decay method. This requires that blanks be installed in the four ducts tested, and worse case, drawn down to 1.25 times the negative pressure caused by a single failure of a return fan damper. The most negative pressure is about -6.4 inches w.c. Drawing the ducts down to this pressure

presents a fatigue challenge to the ducts due to flexing caused by the application of negative pressure. Installation of blanks has caused damage to control room envelope penetrations during flange disassembly for blank installation, which resulted in leakage requiring repair. Some blanks are very large and time consuming to install. For example, two blanks for the intake and exhaust CREF ducting are 4 feet in diameter and one multi piece blank is approximately 100 square feet. The blank installation requires use of silicone while the CREF system is operating in the recirculation mode, which can contaminate the emergency filter carbon and requires off-site carbon sampling for methyl iodide testing after completion of CREF duct leak testing.

Detroit Edison has continued to perform two other surveillance tests at their normal frequency. These tests are targeted at identifying degradation in the integrity of the control room boundary.

The first is SR 3.7.3.3, which is performed every 12 months. Per Fermi 2 Technical Specification Bases, "This SR verifies that the silicone sealant applied to CREF system duct work outside of the CRE has not degraded. The duct work of concern received a general coating of sealant on the duct seams. This SR includes a visual inspection for cracking, debonding, and other abnormal degradation of the applied silicone sealant. Such degradation could be indicative of lack of duct integrity." The Bases also state that "Degradation of the silicone sealant does not necessarily indicate that the CREF system is inoperable. However, the condition must be promptly investigated and resolved. The 12 month Frequency is based on experience that shows the condition of the silicone does not change appreciably over this time period." The results of this SR to date have been very good, with only one silicone inspection noted as unsatisfactory (very small areas showing signs of poor application technique from the original application, Reference 5) since SR 3.7.3.3 was added to the TS in 1992. Since that time, all inspections have shown satisfactory results, with no noticeable degradation in sealant quality. The most recent surveillance performance was November 25, 2003. There has been no sign of general degradation of the silicone sealant since it was first applied, and no repairs have been necessary except for those described in Reference 5.

The other surveillance currently performed to verify CRE integrity is SR 3.7.3.5, which is performed at a frequency of 18 months on a staggered test basis. Again, as stated in the Bases, "This SR verifies the integrity of the control room enclosure and the assumed inleakage rates of potentially contaminated air. The control room positive pressure, with respect to potentially contaminated adjacent areas, is periodically tested to verify proper function of the CREF system. During the emergency mode of operation, the CREF system is designed to slightly pressurize the control room to at least 0.125 inches water gauge positive pressure with respect to the atmosphere outside of the control room to prevent unfiltered inleakage. The CREF system is designed to maintain this positive pressure with a makeup flow rate of less than 1800 cfm to the control room in the recirculation mode. The frequency of 18 months on a staggered test basis is consistent with industry practice and with other filtration system SRs." The results of this SR to date have also been very good, with the most recent results recorded on April 30, 2003, as 1419 cfm, a 21% margin to the acceptance criteria of 1800 cfm. The next scheduled performance of SR 3.7.3.5 is during Refueling Outage 10.

The NRC and the industry have been working together for several years to develop better guidance to address Control Room Habitability (CRH) concerns, including development of improved testing methods to demonstrate the ability of control room designs to meet GDC 19. This effort has culminated in the NRC issuing Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," dated May 2003, and Generic Letter 2003-01, "Control Room Habitability," dated June 12, 2003. These documents note that the current methods for demonstrating CRE integrity may not be adequate, and recommend an integrated CRE inleakage test (such as a tracer gas test).

Based on adding a License Condition to perform tracer gas testing and the continued performance of SR 3.7.3.3 and SR 3.7.3.5 on their normal schedule, the elimination of SR 3.7.3.6 is not expected to result in any significant potential for degradation in performance of the affected ductwork to go undetected.

**ATTACHMENT 2 TO
NRC-04-0043**

**FERMI 2 NRC DOCKET NO. 50-341
OPERATING LICENSE NO. NPF-43**

**PROPOSED LICENSE AMENDMENT TO ADD A LICENSE CONDITION AND
ELIMINATE TECHNICAL SPECIFICATION SR 3.7.3.6**

10 CFR 50.92 SIGNIFICANT HAZARDS CONSIDERATION

10 CFR 50.92 SIGNIFICANT HAZARDS CONSIDERATION

In accordance with 10 CFR 50.92, Detroit Edison has made a determination that the proposed amendment involves no significant hazards consideration. The proposed revision to eliminate SR 3.7.3.6, does not involve a significant hazards consideration for the following reasons:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change is to add a License Condition for tracer gas testing and eliminate SR 3.7.3.6. The Control Room Emergency Filtration (CREF) system provides a configuration for mitigating radiological consequences of accidents; however, it is not considered an initiator of any previously analyzed accident. Therefore, the proposed change cannot increase the probability of any previously evaluated accident.

The CREF system provides a radiologically controlled environment from which the plant can be safely operated following a radiological accident. The current TS surveillance (SR 3.7.3.6) measures inleakage from four sections of CREF system duct work outside the Control Room Envelope (CRE) that are at negative pressure during accident conditions. Performance of tracer gas testing will provide essentially the same degree of assurance that CRE integrity is being maintained as before. Therefore, the proposed change does not significantly increase the radiological consequences of any previously analyzed accident.

Based on the above, the proposed change does not significantly increase the probability or consequences of any accident previously evaluated.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change to add a License Condition for tracer gas testing and to eliminate SR 3.7.3.6 does not alter the design or function of the system involved, nor does it introduce any new modes of plant or CREF system operation. Therefore, the proposed change does not create the potential for a new or different kind of accident from any accident previously evaluated.

3. The proposed change does not involve a significant reduction in the margin of safety.

The proposed change to add a License Condition for tracer gas testing and to eliminate SR 3.7.3.6 will not affect the radiological release from a design basis accident. The postulated dose to the control room occupants as a result of an accident will remain approximately the same. Therefore, the proposed changes will not result in a significant reduction in the margin of safety.

Based on the above, Detroit Edison has determined that the proposed license amendment does not involve a significant hazards consideration.

**ATTACHMENT 3 TO
NRC-04-0043**

**FERMI 2 NRC DOCKET NO. 50-341
OPERATING LICENSE NO. NPF-43**

**PROPOSED LICENSE AMENDMENT TO ADD A LICENSE CONDITION AND
ELIMINATE TECHNICAL SPECIFICATION SR 3.7.3.6**

MARKUP AND TYPED COPIES OF THE PROPOSED CHANGE

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. Required Action and associated Completion Time of Condition A not met during movement of recently irradiated fuel assemblies in the secondary containment, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p>	
	<p>D.1 Place OPERABLE CREF subsystem in recirculation mode.</p>	<p>Immediately</p>
	<p><u>OR</u></p> <p>D.2.1 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p>
	<p><u>AND</u></p> <p>-----NOTE----- Not required for a CREF System or subsystem inoperable for performance of SR 3.7.3.6 due to failure to provide the required filtration efficiency, or due to replacement of charcoal filtration media. -----</p>	<p>delete</p>
<p>D.2.2 Suspend movement of recently irradiated fuel assemblies in the secondary containment.</p>	<p>Immediately</p>	

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>E. Two CREF subsystems or a non-redundant component or portion of the CREF System inoperable in MODE 1, 2, or 3 for reasons other than Condition B.</p>	<p>E.1 Enter LCO 3.0.3.</p>	<p>Immediately</p>
<p>F. Two CREF subsystems or a non-redundant component or portion of the CREF System inoperable during movement of recently irradiated fuel assemblies in the secondary containment, or during OPDRVs.</p>	<p>.....NOTE..... LCO 3.0.3 is not applicable.</p> <p>F.1 Initiate action to suspend OPDRVs.</p> <p><u>AND</u></p> <p>.....NOTE..... Not required for a CREF System or subsystem inoperable for performance of SR 3.7.3.6 due to failure to provide the required filtration efficiency, or due to replacement of charcoal filtration media.</p> <p>F.2 Suspend movement of recently irradiated fuel assemblies in the secondary containment.</p>	<p>Immediately</p> <p>delete</p> <p>Immediately</p>

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.7.3.5 Verify each CREF subsystem can maintain a positive pressure of ≥ 0.125 inches water gauge relative to the outside atmosphere during the recirculation mode of operation at a makeup flow rate of ≤ 1800 cfm.	18 months on a STAGGERED TEST BASIS
SR 3.7.3.6 Verify that unfiltered inleakage from CREF system duct work outside the Control Room envelope that is at negative pressure during accident conditions is within limits.	36 months[#] delete

~~[#] This surveillance requirement may be extended on a one-time basis to prior to startup from RF-10.~~

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. Required Action and associated Completion Time of Condition A not met during movement of recently irradiated fuel assemblies in the secondary containment, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p>	
	<p>D.1 Place OPERABLE CREF subsystem in recirculation mode.</p>	<p>Immediately</p>
	<p><u>OR</u></p>	
	<p>D.2.1 Initiate action to suspend OPDRVs.</p> <p><u>AND</u></p>	<p>Immediately</p>
	<p>-----NOTE----- Not required for a CREF System or subsystem inoperable due to failure to provide the required filtration efficiency, or due to replacement of charcoal filtration media. -----</p>	
	<p>D.2.2 Suspend movement of recently irradiated fuel assemblies in the secondary containment.</p>	<p>Immediately</p>

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.7.3.5 Verify each CREF subsystem can maintain a positive pressure of ≥ 0.125 inches water gauge relative to the outside atmosphere during the recirculation mode of operation at a makeup flow rate of ≤ 1800 cfm.	18 months on a STAGGERED TEST BASIS

**ATTACHMENT 4 TO
NRC-04-0043**

**FERMI 2 NRC DOCKET NO. 50-341
OPERATING LICENSE NO. NPF-43**

**PROPOSED LICENSE AMENDMENT TO ADD A LICENSE CONDITION AND
ELIMINATE TECHNICAL SPECIFICATION SR 3.7.3.6**

**FOR INFORMATION ONLY MARKUP OF THE PROPOSED CHANGES TO THE
TECHNICAL SPECIFICATION BASES**

BASES

ACTIONS (continued)

During movement of recently irradiated fuel assemblies in the secondary containment or during OPDRVs, if the inoperable CREF subsystem cannot be restored to OPERABLE status within the required Completion Time, the OPERABLE CREF subsystem may be placed in the recirculation mode. This action ensures that this remaining subsystem is OPERABLE, that no failures that would prevent automatic actuation will occur, and that any active failure will be readily detected.

An alternative to Required Action D.1 is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, movement of recently irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and the subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

delete

A Note is applied to Required Action D.2.2. This Note allows these Required Actions to not be required ~~when the inoperability is due to CREF system duct work testing required by SR 3.7.3.6 or when the system charcoal filter train filter media cannot provide the required efficiency or is being replaced.~~ Dose calculations have shown that the CREF system is not needed during the activities that would otherwise be suspended by these Required Actions.

E.1

If both CREF subsystems or a non-redundant component or portion of the CREF System are inoperable in MODE 1, 2, or 3 for reasons other than an inoperable control room boundary (i.e., Condition B), the CREF System may not be capable of performing the intended function and the unit is in a condition outside the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

BASES

ACTIONS (continued)

F.1 and F.2

The Required Actions of Condition F are modified by a Note indicating that LCO 3.0.3 does not apply. If moving recently irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of recently irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

During movement of recently irradiated fuel assemblies in the secondary containment or during OPDRVs, with two CREF subsystems or a non-redundant component or portion of the CREF System inoperable, action must be taken immediately to suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, movement of recently irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. If applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

delete

A Note is applied to Required Action F.2. This Note allows these Required Actions to not be required ~~when the inoperability is due to CREF system duct work testing required by SR 3.7.3.6 or when the system charcoal filter train filter media cannot provide the required efficiency or is being replaced.~~ Dose calculations have shown that the CREF system is not needed during the activities that would otherwise be suspended by these Required Actions.

BASES

SURVEILLANCE REQUIREMENTS (continued)

outside of the control room to prevent unfiltered inleakage. The CREF System is designed to maintain this positive pressure with a makeup flow rate of ≤ 1800 cfm to the control room in the recirculation mode. The Frequency of 18 months on a STAGGERED TEST BASIS is consistent with industry practice and other filtration systems SRs.

~~SR 3.7.3.6~~

~~This SR verifies that the accident analysis assumptions concerning leakage in through CREF system duct work outside the control room envelope that would be under negative pressure (less than atmospheric) during accident conditions and where any inleakage would not be filtered are maintained. This test is needed since the CREF system duct work seams have had silicone sealant applied. Since the underlying welds have not been leak tested without silicone sealant and the qualities of the silicone sealant have not been demonstrated over time, a periodic program of verifying the integrity of these sections of duct is required.~~

~~Since the accident analyses assume a single damper failure, the test pressures must account for the worst case negative pressure in each duct of concern.~~

~~The SR Frequency is based upon the long-term nature of the concern and the additional assurance that the condition of the silicone is not changing provided by the annual inspection of the accessible duct work required by~~

~~SR 3.7.3.3.~~

delete

REFERENCES

1. UFSAR, Chapter 6.
2. UFSAR, Chapter 9.
3. UFSAR, Chapter 15.
4. Regulatory Guide 1.52, Revision 2, March 1978.