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TO:        GERLACH\*ROSE M          11/28/2006

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A001

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# SSSES MANUAL

Manual Name: TRM2

Manual Title: TECHNICAL REQUIREMENTS MANUAL UNIT 2

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3.11 Radioactive Effluents

3.11.2 Gaseous Effluents

3.11.2.5 VENTILATION EXHAUST TREATMENT SYSTEM

TRO 3.11.2.5 The appropriate subsystems of the VENTILATION EXHAUST TREATMENT SYSTEM, as described in the Offsite Dose Calculation Manual (ODCM), shall be OPERABLE.

-----NOTE-----

Appropriate subsystems of the VENTILATION EXHAUST TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when projected doses due to gaseous effluent releases from either reactor unit to areas at and beyond the SITE BOUNDARY would exceed 0.3 mrem to any organ in a 31 day period.

APPLICABILITY: At all times.

ACTIONS

-----NOTE-----

1. Separate Condition entry is allowed for each subsystem.
2. The provisions of TRO 3.0.4 are not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. A subsystem of the VENTILATION EXHAUST TREATMENT SYSTEM inoperable.	A.1 Restore subsystem to OPERABLE status.	31 days
B. Required Action and Associated Completion Time of Condition A not met.  <u>OR</u>  Gaseous waste from either reactor unit being discharged without appropriate treatment and in excess of 0.3 mrem to any organ in a 31 day period.	B.1 Prepare and submit a Special Report to the Commission.	30 days

TECHNICAL REQUIREMENT SURVEILLANCE

SURVEILLANCE		FREQUENCY
TRS 3.11.2.5.1	Perform dose projection due to gaseous releases from each reactor unit to areas at and beyond the SITE BOUNDARY in accordance with the methodology and parameters in the ODCM.	31 days
TRS 3.11.2.5.2	<p>-----NOTE-----                      Not required if the appropriate subsystem has been utilized to process radioactive gaseous effluents during the previous 92 days.</p> <p>Verify each subsystem of the VENTILATION EXHAUST TREATMENT SYSTEM is OPERABLE by operating the subsystem <math>\geq</math> 10 minutes.</p>	92 days

## B 3.11.2.5 VENTILATION EXHAUST TREATMENT SYSTEM

BASES

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TRO This TRO ensures that the appropriate subsystems of the VENTILATION EXHAUST TREATMENT SYSTEM, as described in the Offsite Dose Calculation Manual (ODCM) are OPERABLE at all times. The TRO is modified by a Note which requires that the appropriate subsystems of the VENTILATION EXHAUST TREATMENT SYSTEM be used to reduce radioactive materials in gaseous waste prior to their discharge when projected doses due to gaseous effluent releases from either reactor unit to areas at and beyond the SITE BOUNDARY would exceed 0.3 mrem to any organ in a 31 day period. This requirement provides reasonable assurance that the releases of radioactive materials in gaseous effluents will be kept "as low as reasonably achievable." This TRO implements the requirements of 10 CFR Part 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50, and the design objectives given in Section II.D of Appendix I to 10 CFR Part 50. The limits governing the use of appropriate subsystems of the systems were specified as a suitable fraction of the dose design objectives set forth in Sections II.B and II.C of Appendix I, 10 CFR Part 50, for gaseous effluents (Ref. 1).

The VENTILATION EXHAUST TREATMENT SYSTEM is comprised of the following Unit 2 subsystems, as described in the ODCM:

The Unit 2 Zone 2 Reactor Building filtered exhaust subsystem, including the following filters:

2F255A, 2F255B, 2F257A, 2F257B, 2F258A AND 2F258B.

The Unit 2 Zone 3 Reactor Building filtered exhaust subsystem, including the following filters:

2F216A, 2F216B, 2F217A, 2F217B, 2F218A, and 2F218B.

The Unit 2 Turbine Building filtered exhaust subsystem, including the following filters:

2F157A, 2F157B, 2F158A, and 2F158B.

(continued)

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B 3.11.2.5 VENTILATION EXHAUST TREATMENT SYSTEM

BASES

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TRO

(continued)

This section of the TRM is part of the ODCM (Ref. 2) and implements the requirements of the Radiological Effluent Controls Program (Ref. 3).

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ACTIONS

The ACTIONS have been modified by a Note that allows separate Conditions entries for each subsystem. The ACTIONS are defined to ensure proper corrective measures are taken in response to the inoperable components.

(continued)

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## B 3.11.2.5 VENTILATION EXHAUST TREATMENT SYSTEM

BASES

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ACTIONS  
(continued)A.1

The appropriate subsystem of the VENTILATION EXHAUST TREATMENT SYSTEM will be declared inoperable if any of the following conditions exist:

1. Failure of a surveillance test;
2. Broken or non-functional component which prevents the subsystem from being run (e.g., both 100% fans or one 50% fan in the subsystem); or
3. Bypass or degradation of subsystem filtration in which effluent flow continues without full treatment.

With a subsystem of the VENTILATION EXHAUST TREATMENT SYSTEM inoperable, action must be taken to restore it to OPERABLE status. The 31 day Completion Time is a reasonable time frame to repair the inoperable components.

B.1

If the Required Action and Completion Time of Condition A are not met, or gaseous waste is being discharged without treatment and in excess of the TRO limit, a Special Report must be prepared and submitted to the Commission. The 30 day Completion Time is reasonable for preparation of the report. The Special Report should include the following information:

1. Identification of the inoperable equipment or subsystems and the reason for inoperability;
2. Action(s) taken to restore the inoperable equipment to OPERABLE status; and
3. Summary description of action(s) taken to prevent a recurrence.

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(continued)

## B 3.11.2.5 VENTILATION EXHAUST TREATMENT SYSTEM

BASES (continued)

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TRS The TRSs are performed at the specified Frequency to ensure that the VENTILATION EXHAUST TREATMENT SYSTEM is maintained OPERABLE.

TRS 3.11.2.5.1

This surveillance requires that a dose projection be performed in accordance with the methodology and parameters in the ODCM. The dose projection is performed based on the most recently available effluent data. If it is known prior to performing the dose projection that a treatment subsystem will be out of service, and if data exists which indicates how the lack of treatment will impact effluents, these factors will be considered when performing the dose projection. The 31 day Frequency is consistent with Reference 3.

TRS 3.11.2.5.2

This surveillance verifies that each of the subsystems of the VENTILATION EXHAUST TREATMENT SYSTEM is OPERABLE by operating the system  $\geq 10$  minutes. Operation of the subsystem for at least 10 minutes provides sufficient time to verify the appropriate parameters are within their normal operating range. The Frequency of 92 days is appropriate considering the performance of monthly dose projections.

This TRS is modified by a Note which states that the TRS is not required to be performed if the appropriate subsystem has been utilized to process radioactive gaseous effluents during the previous 92 days. This allowance is appropriate because actual processing of radioactive gaseous effluents demonstrates subsystem OPERABILITY.

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- REFERENCES
1. 10 CFR Part 50.
  2. Technical Specification 5.5.1 - Offsite Dose Calculation Manual.
  3. Technical Specification 5.5.4 - Radioactive Effluent Controls program.
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