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

December 13, 2007
NOC-AE-07002230
10CFR50.90

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Supplement 2 to Request for License Amendment Related to
Application of the Alternate Source Term (TAC Nos. MC 4996 & MD 4997)

Reference: Letter from the STP Nuclear Operating Company to the NRC Document Control Desk, "Request for License Amendment Related to Application of the Alternate Source Term," dated March 22, 2007 (NOC-AE-07002127) (ML070890474)

In accordance with the provisions of 10 CFR 50.90, STP Nuclear Operating Company (STPNOC) hereby submits this supplement to the referenced license amendment request for South Texas Project Operating Licenses NPF-76 and NPF-80. The proposed amendment in the referenced letter proposed, in part, deletion of the applicability of Technical Specification (TS) 3/4.7.7, "Control Room Makeup and Cleanup Filtration System," for Modes 5 and 6. The proposal did not provide a justification for deleting the Surveillance Requirement (SR) to verify that the control room air temperature is within limits during these modes. This supplement to the license amendment request provides the technical justification.

Reference 1 also proposed a change to the Engineered Safety Features Actuation System Instrumentation TS that would result in a more restrictive requirement than is in current TS. This supplement provides a revised TS proposal. Upon approval, the TS Bases will be revised for consistency.

The Enclosure provides a technical and regulatory evaluation of the changes.

STPNOC requested that the Application of the Alternate Source Term amendment be approved by March 30, 2008. This supplement is part of that request. Once approved by the NRC, the complete amendment shall be implemented within 120 days due to the significant implementation scope of the subject changes. This implementation period will provide adequate time for the affected station documents to be revised using the appropriate change control mechanisms.

A001
NRR

STI: 32220700

The STPNOC Plant Operations Review Committee has reviewed and concurred with the proposed change to the Technical Specifications.

In accordance with 10 CFR 50.91(b), STPNOC is notifying the State of Texas of this request for a license amendment.

There are no new commitments in this letter.

If there are any questions regarding the proposed amendment, please contact Mr. Ken Taplett at (361) 972-8416 or me at (361) 972-7867.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/13/07.
Date

David W. Rencurrel
Vice President,
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Enclosure: Evaluation of the Proposed Change

cc:
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ENCLOSURE

Evaluation of the Proposed Change

Subject: Supplement 2 to Request for License Amendment Related to Application of the Alternate Source Term

1.0 SUMMARY DESCRIPTION

2.0 DETAILED DESCRIPTION

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ATTACHMENTS:

1. Affected Technical Specification Page
2. Affected Technical Requirements Manual Page (For Information Only)
3. Revised Proposed Change to Technical Specification Page 3/4 3-28

ENCLOSURE

1.0 SUMMARY DESCRIPTION

Reference 1 requests the application of the alternative source term (AST) methodology in evaluating design-basis accidents for the South Texas Project (STP) Units 1 and 2. The application requests, in part, that the applicability for Modes 5 and 6 for Technical Specification (TS) 3/4.7.7, "Control Room Makeup and Cleanup Filtration System," be deleted. The basis for this request is that the accident mitigation capabilities of this system are no longer credited in AST design-basis accident analysis during activities when fuel is being handled or during core alterations.

As a defense-in-depth measure to mitigate the consequences of a postulated fuel handling accident (FHA) beyond that required by the safety analyses, the STP Nuclear Operating Company (STPNOC) committed to maintain at least one Control Room Makeup and Cleanup Filtration System operable or capable of being restored to an operable status within two hours when irradiated fuel is being moved or when conducting crane operation with loads over the spent fuel pool. In Reference 1, STPNOC provided, for information only, a planned change to the Technical Requirements Manual (TRM) that will meet the commitment. The planned TRM requirement includes the same TS surveillance requirements (SR) as TS 3/4.7.7 with the exception that the surveillance to verify that the system automatically starts upon initiation of a high radiation or safety injection test signal is not included.

The current TS 3/4.7.7 has SR 4.7.7.a to verify at least once per 12 hours that the control room air temperature is less than or equal to 78°F. The proposed change in Reference 1 deletes this SR during Mode 5 and Mode 6 (when not moving fuel) without providing a justification for this change. The affected TS page from Reference 1 is provided as Attachment 1 to this Enclosure. The planned TRM requirement change (Attachment 2) will result in relocation of this SR to the TRM. This supplement to Reference 1 justifies relocation of the SR.

In addition, Reference 1 proposed a change to the Engineered Safety Features Actuation System Instrumentation TS that would result in a more restrictive requirement than is in current TS. This supplement provides a revised TS proposal.

2.0 DETAILED DESCRIPTION

Reference 1 proposes to revise TS 3/4.7.7 removing Modes 5 and 6 as applicable modes for the LCO requirements for the Control Room Makeup and Cleanup Filtration System. See Attachment 1. As a defense-in-depth measure to mitigate the consequences of a postulated fuel handling accident (FHA) beyond that required by the safety analyses, the STPNOC committed to maintain at least one Control Room Makeup and Cleanup Filtration System operable or capable of being restored to an operable status within two hours when irradiated fuel is being moved or when conducting crane operation with loads over the spent fuel pool. The proposed TRM

requirement is provided in Attachment 2. This proposal will result in relocation of the SR to verify control room air temperature is within limits from the TS to the TRM.

If the control room air temperature can not be maintained within limits under the current TS, the required action in Modes 5 and 6 is to suspend the movement of spent fuel and suspend crane operations with loads over the spent fuel pool. Note that other actions for this condition in current TS include suspending all operations involving core alterations and suspending operations involving positive reactivity additions that could result in loss of required shutdown margin or required boron concentration. Justification for deleting these actions is provided in Reference 1.

Reference 1 proposes a new TRM Limiting Condition for Operation (LCO) requirement for ensuring that one operable Control Room Makeup and Cleanup Filtration System is maintained or capable of being restored to operable status within two hours. The proposed requirement includes a verification that the control room air temperature is less than or equal to 78°F. See Attachment 2. If the LCO is not met, all operations involving the movement of irradiated fuel and crane operation with loads over the spent fuel pool must be suspended.

The proposed TRM action is equivalent to the current TS action for a condition where control room air temperature can not be maintained within limits during Modes 5 and 6.

The following evaluation provides justification for re-locating the specific requirement of maintaining control room air temperature limits from the TS in Modes 5 and 6 to the TRM.

Reference 1 proposed a change to Table 3.3-3, "Engineering Safety Features Actuation System Instrumentation," for the condition when the number of operable channels of Control Room Intake Air Radioactivity instrumentation is two less than the minimum channels operable requirement. Specifically, the change modifies the ACTION 28 requirement for Functional Unit 10.d, "Control Room Intake Air Radioactivity – High," to delete suspension of core alterations, movement of irradiated fuel, and crane operation with loads over the spent fuel pool because the accident mitigation capabilities of this system are no longer credited in AST design basis accident analysis during these activities. The proposed change to ACTION 28 requires for a condition if both intake air radioactivity monitors are inoperable, within 1 hour, initiate and maintain operation of the Control Room Makeup and Cleanup Filtration System in the recirculation and makeup filtration mode at 100% capacity for MODES 1 though 4.

The current TS requires for a condition if both intake air radioactivity monitors are inoperable, within 1 hour, initiate and maintain operation of the Control Room Makeup and Cleanup Filtration System in the recirculation and makeup filtration mode at 100% capacity for MODES 1 though 4. If this can not be accomplished, the current TS requires immediately to suspend core alterations, movement of irradiated fuel, and crane operation with loads over the spent fuel pool and within 12 hours initiate and maintain operation of the Control Room Makeup and Cleanup Filtration System in the recirculation and makeup filtration mode at 100% capacity.

With the proposed deletion of the requirements to suspend core alterations, movement of irradiated fuel, and crane operation with loads over the spent fuel pool, there is no need to place the Control Room Makeup and Cleanup Filtration System in the recirculation and makeup filtration mode at 100% capacity within one hour. This is an overly restrictive requirement. The 12 hour requirement to complete this action is appropriate and remains consistent with TS 3/4 .7.7 that allows all trains of Control Room Makeup and Cleanup Filtration System to be inoperable for 12 hours.

This supplement to Reference 1 proposes to change ACTION 28 in Table 3.3-3, item b. to read:

> "With the number of OPERABLE channels two less than the Minimum Channels OPERABLE requirement, within 12 hours, initiate and maintain operation of the Control Room Makeup and Cleanup Filtration System (at 100% capacity) in the recirculation and makeup filtration mode."

3.0 TECHNICAL EVALUATION

The operability of the Control Room Makeup and Cleanup Filtration System ensures that (1) the ambient air temperature does not exceed the allowable temperature for continuous-duty rating for the equipment and instrumentation cooled by this system, and (2) the control room will remain habitable for operations personnel during and following credible accident conditions.

For Modes 1 through 4, the control room occupancy requirements to maintain a habitable control room for 30 days of continuous occupancy following a design basis accident are unaffected by this change because the temperature verification SR remains in TS 3/4.7.7. During the movement of irradiated fuel or when conducting crane operation with loads over the spent fuel pool, the proposed TRM requirement specifies that one Control Room Makeup and Cleanup Filtration System shall be operable or capable of being restored to operable status within two hours, including the SR of ensuring that the control room air temperature is within requirements. If the control room air temperature is not maintained within limits, the LCO is not met and the actions required by the TRM proposal are the equivalent to those in current TS during fuel handling or during operations with loads over the spent fuel pool.

The proposed TRM requirement ensures that the ambient air temperature does not exceed the allowable temperature for continuous-duty rating for the equipment and instrumentation in the control room and also ensures a habitable environment for control room personnel in the event of a fuel handling accident. Reference 1 provides an analysis that demonstrates that the control room will remain habitable for personnel during and following a fuel handling accident (i.e., filtration is not required to meet accident dose limits).

Control room temperature limits are routinely met with one Control Room Makeup and Cleanup Filtration System operating with cooling provided to the system air handling unit by the same train Essential Chilled Water System. In the event of a fuel handling accident, the heat load in the control room is not affected such that one Control Room Makeup and Cleanup Filtration System is sufficient to meet temperature limits. Therefore, only one Control Room Makeup and

Cleanup Filtration System needs to be operable or capable of being restored to an operable status within two hours to ensure sufficient cooling is available.

The temperature monitoring requirement for the control room meets none of the criteria of 10 CFR 50.36(c)(2)(ii) (see Section 4.1) for information or requirements to be included in the Technical Specifications.

(a) Control room temperature monitoring has no function with regard to detection of failure of the reactor coolant pressure boundary.

(b) Control room temperature is not an accident analysis parameter.

(c) Control room temperature monitoring system does not serve any primary safety function and has no actuation functions for accident mitigation.

(d) Temperature monitors in the control room are located in areas that are readily accessible to the operators. The loss of control room temperature monitoring was found to be a low risk contributor to core damage frequency and offsite releases.

The proposed relocation of verifying that the control room air temperature remains within limits from the TS to the TRM for the modes of operation of concern is justified because (1) the required actions are equivalent if the limits can not be maintained and (2) the temperature monitoring requirement for the control room meets none of the criteria of 10 CFR 50.36(c)(2)(ii).

The proposed change to ACTION 28 of Table 3.3-3 is consistent with current TS because the alternate actions of suspension of core alterations, movement of irradiated fuel, and crane operation with loads over the spent fuel pool are no longer credited in AST design basis accident analysis during these activities.

4.0 REGULATORY ANALYSIS

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 50.36(c)(2)(ii) provides the criteria for establishing the limiting conditions for operation in Technical Specifications. These criteria are:

(a) *Criterion 1.* Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

(b) *Criterion 2.* A process variable, design feature, or operating restriction that is an initial condition of a design-basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

(c) *Criterion 3.* A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design-basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

(d) *Criterion 4.* A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

10 CFR 50.59 controls changes to the facility, tests and experiments. The Technical Requirements Manual will be maintained pursuant to 10 CFR 50.59.

4.2 Precedent

Area temperature monitoring requirements for other vital areas serving the South Texas Project units were approved for relocation from the STP TS to the TRM by License Amendments 100 (Unit 1) and 87 (Unit 2). (Reference 2)

4.3 Significant Hazards Consideration

STPNOC proposes that the requirement for verifying control room temperature during Modes 5 and 6 be relocated from the current Technical Specifications to the Technical Requirements Manual. STPNOC has evaluated the proposed change from the TS to the TRM using the criteria in 10 CFR 50.36(c)(2)(ii) and determined that SR 4.7.7.a does not meet the requirements for incorporation in the Technical Specifications for Modes 5 and 6.

The evaluation in Reference 1 whether a significant hazards consideration is involved with the proposed amendment bounds this supplemental change to the amendment. STP concludes that this supplemental change to the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c); and accordingly, the finding provided in Reference 1 of "no significant hazards consideration" requires no additional justification.

4.4 Conclusions

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 with this supplement will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATIONS

A review has determined that the amendment proposed in Reference 1 with this supplement 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 with this supplement does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment with this supplement 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 need be prepared in connection with the proposed amendment with this supplement.

6.0 REFERENCES

1. Letter from the STP Nuclear Operating Company to the NRC Document Control Desk, "Request for License Amendment Related to Application of the Alternate Source Term," dated March 22, 2007 (NOC-AE-07002127) (TAC Nos. MD 4996 and MD 4997) (Accession No. ML070890474)

2. South Texas Project, Units 1 and 2 – Amendment Nos. 100 and 87 to Facility Operating Licenses Nos. NPF-76 and NPF-80, dated November 18, 1998 (ST-AE-NOC-000301) (TAC Nos. MA2506 AND MA2507) (Accession No. ML021330383)

ENCLOSURE, ATTACHMENT 1

Affected Technical Specification Page

[Previously provided in Attachment 2 to Reference 1)

Note : The attached page reflects the TS, with proposed revisions, at the time of the submittal of Reference 1. On July 13, 2007, STPNOC received approval from the NRC of License Amendments 179 (Unit 1) and 166 (Unit 2) for implementing risk-informed TS. These amendments allowed application of the requirements of the Configuration Risk Management Program to Actions a, b and c on the attached page. The proposal in Reference 1 does not impact the change approved for implementation of risk-informed TS. Upon approval of the AST license amendment request, the final TS pages will be reconciled.

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 1, 2, 3, and 4

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;

ENCLOSURE, ATTACHMENT 2

Affected TRM Page

(For Information Only)

[Previously provided in Attachment 4 to Reference 1)

REFUELING OPERATIONS

3/4.9.14 CONTROL ROOM MAKEUP AND CLEANUP FILTRATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.9.14 One Control Room Makeup and Cleanup Filtration System shall be OPERABLE
OR
If not OPERABLE, capable of being restored to an OPERABLE status within two hours.

APPLICABILITY: During the movement of irradiated fuel or when conducting crane operation with loads over the spent fuel pool.

ACTION: With no Control Room Makeup and Cleanup Filtration Systems OPERABLE or capable of being restored to an OPERABLE status within two hours, suspend all operations involving movement of irradiated fuel and crane operation with loads over the spent fuel pool.

SURVEILLANCE REQUIREMENTS

4.9.14 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;

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.

ENCLOSURE, ATTACHMENT 3

Revised Proposed Change to Technical Specification Page 3/4 3-28

Instructions: Replace page 3/4 3-28 in Reference 1 with the attached page.

TABLE 3.3-3 (Continued)

ACTION STATEMENTS (Continued)

ACTION 23 - With the number of OPERABLE channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within 6 hours and in at least HOT SHUTDOWN within the following 6 hours.

ACTION 24 - With the number of OPERABLE channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or declare the associated valve inoperable and take the ACTION required by Specification 3.7.1.5.

ACTION 25 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 24 hours, or be in at least HOT STANDBY within the next 6 hours; however, one channel may be bypassed for up to 4 hours for surveillance testing per Specification 4.3.2.1 provided the other channel is OPERABLE.

ACTION 26 - With the number of OPERABLE channels less than the Minimum Channels OPERABLE requirement, declare the affected Auxiliary Feedwater Pump inoperable and take ACTION required by Specification 3.7.1.2.

ACTION 27 - For an inoperable channel, declare its associated ventilation train inoperable and apply the actions of Specification 3.7.7.

ACTION 28 - a. With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, within 7 days initiate and maintain operation of the Control Room Makeup and Cleanup Filtration System (at 100% capacity) in the recirculation and makeup filtration mode.

b. With the number of OPERABLE channels two less than the Minimum Channels OPERABLE requirement, within ~~1 hour~~ **12 hours** initiate and maintain operation of the Control Room Makeup and Cleanup Filtration System (at 100% capacity) in the recirculation and makeup filtration mode~~, **OR**~~

~~**immediately suspend CORE ALTERATIONS, movement of irradiated fuel assemblies and crane operations with loads over the spent fuel pool, AND within 12 hours initiate and maintain operation of the Control Room Makeup and Cleanup Filtration System (at 100%capacity) in the recirculation and makeup filtration mode. CORE ALTERATIONS, movement of irradiated fuel assemblies, and crane operations with loads over the spent fuel pool are permitted during operation of the Control Room Makeup and Cleanup Filtration System (at 100% capacity) in the recirculation and makeup filtration mode.**~~

c. With required ACTION 28a. or 28b. not met in MODE 1,2,3, or 4, ~~**immediately suspend movement of irradiated fuel assemblies and crane operations with loads over *the* spent fuel pool. AND**~~ be in MODE 3 in 6 hours and in MODE 5 in the following 30 hours.

~~**d. With required ACTION 28a. or 28b. not met in MODE 5 or 6, immediately suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and crane operations with loads over the spent fuel pool.**~~

~~**ACTION 29 - For an inoperable channel, declare its associated ventilation train inoperable and apply the actions of Specification 3.7.8.**~~

~~**ACTION 30 - With irradiated fuel in the spent fuel pool: With the number of OPERABLE channels less than the Minimum Channels OPERABLE requirement, fuel movement within the spent fuel pool or crane operation with loads over the spent fuel pool may proceed provided the FHB exhaust air filtration system is in operation and discharging through at least one train of HEPA filters and charcoal adsorbers.**~~