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10 CFR 50.90

5928-08-20047

March 14, 2008

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Three Mile Island Nuclear Station, Unit 1
Facility Operating License No. DPR-50
NRC Docket No. 50-289

Subject: Three Mile Island Unit 1, Additional Information for Technical Specifications Regarding Control Room Envelope Habitability in Accordance with TSTF-448, Revision 3

References:
(1) Exelon/AmerGen Letter to USNRC, "Exelon/AmerGen Application to Revise Technical Specifications Regarding Control Room Envelope Habitability in Accordance with TSTF-448, Revision 3, Using the Consolidated Line Item Improvement Process," dated April 12, 2007

(2) Exelon/AmerGen Letter to USNRC, "Response to Request for Additional Information - Exelon/AmerGen Application to Revise Technical Specifications Regarding Control Room Envelope Habitability in Accordance with TSTF-448, Revision 3, Using the Consolidated Line Item Improvement Process," dated January 18, 2008.

This letter updates the previously submitted Three Mile Island Nuclear Station, Unit 1 (TMI Unit 1) Technical Specification (TS) Change Request involving TSTF-448, Revision 3, "Control Room Habitability," submitted to the NRC for review on April 12, 2007 (Reference 1).

TMI Unit 1 received a Nuclear Regulatory Commission (NRC) Request for Additional Information (RAI) via email on October 25, 2007 for the submitted TS changes. Exelon Generation Company, LLC (Exelon)/AmerGen Energy Company, LLC (AmerGen) responded to the NRC's RAI on January 18, 2008 (Reference 2). The Exelon/AmerGen response to NRC RAI #1 was questioned by the NRC via teleconference on February 15, 2008.

As a result of the February 15, 2008 telecon, AmerGen is submitting revisions to the proposed TS page 3-61 and TS BASES page 3-62 to align with TSTF-448 wording on timing of terminating irradiated fuel handling and achieving hot and cold shutdown. Enclosure 1 provides a complete, updated replacement set of the proposed Three Mile Island Unit 1 TS/TS BASES pages previously submitted in Reference 1, including revised pages 3-61 and 3-62.

Updated pages have been provided for Facility Operating License page 8 and TS BASES page 6-29 to reflect separate, unrelated changes approved by NRC letter dated July 18, 2007 and Amendment No. 261, dated September 27, 2007, respectively. These approvals were granted by the NRC subsequent to the Reference 1 submittal. The text inserts in the affected sections for this submittal remain unchanged; however, the section and page numbering has been updated accordingly.

Exelon/AmerGen has reviewed the information supporting a finding of no significant hazards consideration that was previously provided to the NRC in Reference 1. The additional information provided in this submittal does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration.

No new regulatory commitments are established by this submittal. If any additional information is needed, please contact Wendi Rapisarda at (610) 765-5726.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 14th day of March, 2008.

Sincerely,

Pamela B. Cowan
Director – Licensing and Regulatory Affairs
AmerGen Energy Company, LLC

Enclosure: 1) Proposed Technical Specification and Technical Specification Bases Changes

cc: Regional Administrator, NRC Region I
NRC Senior Resident Inspector – TMI Unit 1
P. J. Bamford, NRC Project Manager, TMI Unit 1
Director, Bureau of Radiation Protection, Pennsylvania Department of Environmental Resources
Chairman, Board of County Commissioners of Dauphin County, PA
Chairman, Board of Supervisors of Londonderry Township, PA
J. H. Riley – NEI
TMI File No. 04096 (TSCR No. 336)

ENCLOSURE 1

Three Mile Island Nuclear Station, Unit 1

Proposed Technical Specification and Technical Specification Bases Changes

TECHNICAL SPECIFICATION PAGES (Mark-ups)

TMI Unit 1

Facility Operating License

Page 8

Technical Specification
Pages

3-61
3-62
4-55
4-55a
6-29*

* Replaces Page 6-26 contained in the April 12, 2007 submittal to reflect a separate, unrelated amendment subsequently issued by the NRC.

(14) AmerGen shall provide decommissioning funding assurance of no less than $303 million, after payment of any taxes, to be held in the decommissioning trust(s) for TMI-1 at the time of the transfer of the TMI-1 license to AmerGen, including any amounts held in any decommissioning trust(s) that may continue to be maintained by GPU Energy for TMI-1 alter such license transfer.

(15) AmerGen shall take all necessary steps to ensure that the decommissioning trust is maintained in accordance with the application, the requirements of the Order Approving Transfer of License and Conforming Amendment, dated April 12, 1999, and the related Safety Evaluation dated April 12, 1999.

(16) AmerGen shall take no action to cause Exelon Generation Company, LLC (or successors or assigns of Exelon Generation Company, LLC approved by the NRC) to void, cancel, or diminish the $200 million contingency fund commitment from Exelon Generation Company, LLC (or successors or assigns of Exelon Generation Company, LLC approved by the NRC) dated December 22, 2003, or cause it to fail to perform or impair its performance under the commitment, or remove or interfere with AmerGen's ability to draw upon the commitment. Further, AmerGen shall inform the Director, Office of Nuclear Reactor Regulation, in writing, at such time that it draws upon the $200 million contingency fund. This provision does not affect the NRC's authority to assure that adequate funds will remain available to fund the transition to safe shutdown, should any question arise regarding availability of funds for such a purpose.

(17) Mitigation Strategy License Condition

The licensee shall develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

(a) Fire fighting response strategy with the following elements:
1. Pre-defined coordinated fire response strategy and guidance
2. Assessment of mutual aid fire fighting assets
3. Designated staging areas for equipment and materials
4. Command and control
5. Training of response personnel

(b) Operations to mitigate fuel damage considering the following:
1. Protection and use of personnel assets
2. Communications
3. Minimizing fire spread
4. Procedures for implementing integrated fire response strategy
5. Identification of readily-available pre-staged equipment
6. Training on integrated fire response strategy
7. Spent fuel pool mitigation measures

(c) Actions to minimize release to include consideration of:

1. Water spray scrubbing
2. Dose to onsite responders

→ INSERT (18)

INSERT TO TMI UNIT 1 FACILITY OPERATING LICENSE PAGE 8

(18) Upon implementation of Amendment No. XXX adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by Specification 4.12.1.5, in accordance with TS 6.19.c.(i), the assessment of CRE habitability as required by Specification 6.19.c.(ii), and the measurement of CRE pressure as required by Specification 6.19.d, shall be considered met. Following implementation:

(a) The first performance of Specification 4.12.1.5, in accordance with Specification 6.19.c,(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of Specification 1.25, as measured from August 21, 2000, the date of the most recent successful tracer gas test, as stated in the December 9, 2003 letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.

(b) The first performance of the periodic assessment of CRE habitability, Specification 6.19.c.(ii), shall be within 3 years, plus the 9-month allowance of Specification 1.25, as measured from August 21, 2000, the date of the most recent successful tracer gas test, as stated in the December 9, 2003 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.

(c) The first performance of the periodic measurement of CRE pressure, Specification 6.19.d, shall be within 24 months, plus the 180 days allowed by Specification 1.25, as measured from December 9, 2006, the date of the most recent successful pressure measurement test, or within 180 days if not performed previously.

3.15 AIR TREATMENT SYSTEMS

3.15.1 EMERGENCY CONTROL ROOM AIR TREATMENT SYSTEM

Applicability

Applies to the emergency control room air treatment system and its associated filters and to the Control Room Envelope Boundary.

Note

The Control Room Envelope (CRE) boundary may be opened intermittently under administrative control.

Objective

To specify minimum availability and efficiency for the emergency control room air treatment system and its associated filters.

Specifications

3.15.1.1 Except as specified in Specification 3.15.1.3 below, both emergency treatment systems, AH-E18A fan and associated filter AH-F3A and AH-E18B fan and associated filter AH-F3B shall be operable at all times, per the requirements of Specification 3.15.1.2 below; when containment integrity is required and when irradiated fuel handling operations are in progress.

3.15.1.2 a. The results of the in-place DOP and halogenated hydrocarbon tests at design flows on HEPA filters and charcoal absorber banks shall show < 0.05% DOP penetration and < 0.05% halogenated hydrocarbon penetration, except that the DOP test will be conducted with prefilters installed.

b. The results of laboratory carbon sample analysis shall show ≥ 95% radioactive methyl iodide decontamination efficiency when tested in accordance with ASTM D3803-1989 at 30°C, 95% R.H.

c. The fans AH-E18A and B shall each be shown to operate within ± 4000 CFM of design flow (40,000 CFM).

d. The Control Room Envelope boundary shall be maintained such that the CRE occupant dose from a large radioactive release does not exceed the calculated dose in the licensing basis consequences analyses for DBA's and that CRE occupants are protected from hazardous chemicals and smoke.

3.15.1.3 From and after the date that one control room air treatment system is made or found to be inoperable for ~~any~~ reason other than 3.15.1.2d, reactor operation or irradiated fuel handling operations are permissible only during the succeeding 7 days provided the redundant system is verified to be OPERABLE.

3.15.1.4 From the date that both control room air treatment systems are made or found to be inoperable for a reason other than 3.15.1.2d, or if the inoperable system of 3.15.1.3 cannot be made operable in 7 days, irradiated fuel handling operations shall be terminated in 2 hours and reactor shutdown shall be initiated and the reactor shall be in cold shutdown within 48 hours.

3.15.1.5 From the date that one or both control room air treatment systems are made or found to be inoperable due to an inoperable Control Room Envelope boundary, actions to implement mitigating actions shall be initiated immediately, verification that the

mitigating actions ensure CRE occupant exposures to radiological, chemical, and smoke hazards will not exceed limits shall be performed within 24 hours, and the CRE boundary shall be restored to operable status within 90 days. Irradiated fuel handling operations shall be terminated ~~IF 2 hours~~. If the CRE boundary cannot be made operable in 90 days, reactor shutdown shall be initiated and the reactor shall be in cold shutdown within ~~48~~ 36 hours.

immediately

Hot Shutdown within 6 hours and in

Amendment No. ~~55, 67, 78, 149, 199~~, 226

Bases

The emergency control room air treatment systems AH-E18A and 18B and their associated filters are two independent systems designed to filter the control room atmosphere for intake air and/or for recirculation during control room isolation conditions. Air is recirculated and filtered in the Control Room Envelope (CRE) and within a CRE boundary that limits the inleakage of unfiltered air. Ductwork, valves or dampers, doors, barriers, and instrumentation also form part of the systems. The control building is designed to be automatically placed in the recirculation mode upon an RM-A1 high radiation alarm, air tunnel device actuation, ESAS actuation or station blackout condition. The emergency control room air treatment fan and filter AH-E18A or B and AH-F3A or B is designed to be manually started by the operator if a high radiation alarm from RM-A1 is indicated.

Prefilters and high efficiency particulate absolute (HEPA) filters are installed before the charcoal absorbers to prevent clogging of the iodine adsorbers and remove particulate activity. The charcoal adsorbers are installed to reduce the potential intake of radiolodine to the control room. If the efficiencies of the HEPA filters and charcoal adsorbers are as specified, the resulting doses will be less than the allowable levels stated in Criterion 19 of the General Design Criteria for Nuclear Power Plants, Appendix A to 10 CFR Part 50. Operation of the fans significantly different from the design flow will change the removal efficiency of the HEPA filters and charcoal adsorbers.

If one system is found to be inoperable for reasons other than an inoperable control room envelope boundary, there is no immediate threat to the control room and reactor operation or refueling may continue for a limited period of time while repairs are being made. If the system cannot be repaired within 7 days, the reactor is shut down and brought to cold shutdown within 48 hours and irradiated fuel handling operations are terminated within 2 hours.

If both systems are found to be inoperable for reasons other than an inoperable control room envelope boundary, reactor shutdown shall be initiated and the reactor will be brought to cold shutdown in 48 hours and irradiated fuel handling operations will be stopped within 2 hours.

In-place testing for penetration and system bypass shall be performed in accordance with ANSI N510-1980. Charcoal samples shall be obtained in accordance with ANSI N509-1980. Any HEPA filters found defective shall be replaced with filters qualified according to Regulatory Guide 1.52, Revision 2. Any lot of charcoal adsorber which fails the laboratory test criteria shall be replaced with new adsorbent qualified according to ASTM D3803-1989.

Laboratory testing of charcoal samples will be performed in accordance with the methods prescribed by ASTM D3803-1989. Design basis accident analyses assume the carbon adsorber is 90% efficient in its total radiolodine removal. Therefore, using a Safety Factor of 2 (Ref. 3), the acceptance criteria for the laboratory test of carbon adsorber is set at greater than or equal to 95% [(100 – 90) / 2 = 5% penetration].

The CRE is the area within the confines of the CRE boundary that contains the spaces that control room occupants inhabit to control the unit during normal and accident conditions. This area encompasses the control room, and may encompass other non-critical areas to which frequent personnel access or continuous occupancy is not necessary in the event of an accident. The CRE is protected during normal operation, natural events, and accident conditions. The CRE boundary is the combination of walls, floor, roof, ducting, doors, penetrations and equipment that physically form the CRE. The OPERABILITY of the CRE boundary must be maintained to ensure that the inleakage of unfiltered air into the CRE will not exceed the inleakage assumed in the licensing basis analysis of design basis accident (DBA) consequences to CRE occupants. The CRE and its boundary are defined in the Control Room Envelope Habitability Program.

In order for the Emergency Control Room Air Treatment trains to be considered OPERABLE, the CRE boundary must be maintained such that the CRE occupant dose from a large radioactive release does not exceed the calculated dose in the licensing basis consequence analyses for DBAs, and that CRE occupants are protected from hazardous chemicals and smoke.

~~The emergency control room air treatment system provides protection from smoke and hazardous chemicals to the CRE occupants.~~ The analysis of hazardous chemical releases demonstrates that the toxicity limits are not exceeded in the CRE following a hazardous chemical release ~~(Ref. 3)~~. The evaluation of a smoke challenge demonstrates that it will not result in the inability of the CRE occupants to control the reactor either from the control room or from the remote shutdown panels (Ref. 1).

INSERT A

The control room envelope (CRE) boundary may be opened intermittently under administrative control. This only applies to openings in the CRE boundary that can be rapidly restored to the design condition, such as doors, hatches, floor plugs, and access panels. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls should be proceduralized and consist of stationing a dedicated individual at the opening who is in continuous communication with the operators in the control room. This individual will have a method to rapidly close the opening and to restore the CRE boundary to a condition equivalent to the design condition when a need for CRE isolation is indicated.

If the unfiltered inleakage of potentially contaminated air past the CRE boundary and into the CRE can result in CRE occupant radiological dose greater than the calculated dose of the licensing basis analyses of DBA consequences (allowed to be up to 5 rem TEDE), or inadequate protection of CRE occupants from hazardous chemicals or smoke, the CRE boundary is inoperable. Actions must be taken to restore an OPERABLE CRE boundary within 90 days.

During the period that the CRE boundary is considered inoperable, action must be initiated to implement mitigating actions to lessen the effect on CRE occupants from the potential hazards of a radiological or chemical event or a challenge from smoke. Actions must be taken within 24 hours to verify that in the event of a DBA, the mitigating actions will ensure that CRE occupant radiological exposures will not exceed the calculated dose of the licensing basis analyses of DBA consequences, and that CRE occupants are protected from hazardous chemicals and smoke. These mitigating actions (i.e., actions that are taken to offset the consequences of the inoperable CRE boundary) should be preplanned for implementation upon entry into the condition, regardless of whether entry is intentional or unintentional. The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period, and the use of mitigating actions. The 90 day Completion Time is reasonable based on the determination that the mitigating actions will ensure protection of CRE occupants within analyzed limits while limiting the probability that CRE occupants will have to implement protective measures that may adversely affect their ability to control the reactor and maintain it in a safe shutdown condition in the event of a DBA. In addition, the 90 day Completion Time is a reasonable time to diagnose, plan and possibly repair, and test most problems with the CRE boundary.

INSERT B

References

(1) FSAR Section 9.8
(2) ~~FSAR Figure 9-21~~ DELETED
(3) NRC Generic Letter 99-02, dated June 3, 1999.
(4) FSAR Section 7.4.5

Insert to TMI Unit 1 TS BASES Page 3-62

Insert A

This is because there are no credible hazardous chemical releases that exceed toxicity limits in the CRE (Ref. 4).

Insert B

In the event that irradiated fuel handling operations shall be terminated immediately, this does not preclude the movement of fuel to a safe position.

4.12 AIR TREATMENT SYSTEM

4.12.1 EMERGENCY CONTROL ROOM AIR TREATMENT SYSTEM

Applicability

Applies to the emergency control room air treatment system and associated components.

Objective

To verify that this system and associated components will be able to perform its design functions.

Specification

4.12.1.1 At least every refueling interval, the pressure drop across the combined HEPA filters and charcoal adsorber banks of AH-F3A and 3B shall be demonstrated to be less than 6 inches of water at system design flow rate (±10%).

4.12.1.2 a. The tests and sample analysis required by Specification 3.15.1.2 shall be performed initially and at least once per year for standby service or after every 720 hours of system operation and following significant painting, steam, fire or chemical release in any ventilation zone communicating with the system that could contaminate the HEPA filters or charcoal adsorbers.

b. DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing which could affect the HEPA filter bank bypass leakage.

c. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of the charcoal adsorber bank or after any structural maintenance on the system housing which could effect the charcoal adsorber bank bypass leakage.

d. Each AH-E18A and B (AH-F3A and B) fan/filter circuit shall be operating at least 10 hours every month.

4.12.1.3 At least once per refueling interval, automatic initiation of the required Control Building dampers for isolation and recirculation shall be demonstrated as operable.

4.12.1.4 An air distribution test shall be performed on the HEPA filter bank initially, and after any maintenance or testing that could affect the air distribution within the system . The air distribution across the HEPA filter bank shall be uniform within ±20%. The test shall be performed at 40,000 cfm (±10%) flow rate.

4.12.1.5 Control Room Envelope unfiltered air inleakage testing shall be performed in accordance with the Control Room Envelope Habitability Program.

BASES

Pressure drop across the combined HEPA filters and charcoal adsorbers of less than 6 inches of water at the system design flow rate will indicate that the filters and adsorbers are not clogged by excessive amounts of foreign matter. Pressure drop should be determined at least once per refueling cycle to show system performance capability.

The frequency of tests and sample analysis are necessary to show that the HEPA filters and charcoal adsorbers can perform as evaluated. Tests of the charcoal adsorbers with halogenated hydrocarbon shall be performed in accordance with approved test procedures. Replacement adsorbent should be qualified according to ASTM D3803-1989. The charcoal adsorber efficiency test procedures should allow for the removal of one adsorber tray, emptying of one bed from the tray, mixing the adsorbent thoroughly and obtaining at least two samples. Each sample should be at least two inches in diameter and a length equal to the thickness of the bed. If test results are unacceptable all adsorbent in the system shall be replaced. Tests of the HEPA filters with DOP aerosol shall also be performed in accordance with approved test procedures. Any HEPA filters found defective should be replaced with filters qualified according to Regulatory Guide 1.52 March 1978.

Operation of the system for 10 hours every month will demonstrate operability of the filters and adsorber system and remove excessive moisture built up on the adsorber.

If significant painting, steam, fire or chemical release occurs such that the HEPA filter or charcoal adsorber could become contaminated from the fumes, chemicals or foreign materials, the same tests and sample analysis shall be performed as required for operational use. The determination of significance shall be made by the Vice President-TMI Unit 1.

Demonstration of the automatic initiation of the recirculation mode of operation is necessary to assure system performance capability. Dampers required for control building isolation and recirculation are specified in UFSAR Sections 7.4.5 and 9.8.1.

Control Room Envelope unfiltered air inleakage testing verifies the OPERABILITY of the CRE boundary by testing for unfiltered air inleakage past the CRE boundary and into the CRE. The details of the testing are specified in the Control Room Envelope Habitability Program.

The CRE is considered habitable when the radiological dose to CRE occupants calculated in the licensing basis analyses of DBA consequences is no more than 5 rem TEDE and the CRE occupants are protected from hazardous chemicals and smoke. Air inleakage testing verifies that the unfiltered air inleakage into the CRE is no greater than the flow rate assumed in the licensing basis analyses of DBA consequences. When unfiltered air inleakage is greater than the assumed flow rate, Section 3.15.1.5 must be entered. The required actions allow time to restore the CRE boundary to OPERABLE status provided mitigating actions can ensure that the CRE remains within the licensing basis habitability limits for the occupants following an accident. Compensatory measures are discussed in Regulatory Guide 1.196, Section C.2.7.3, (Ref. 1) which endorses, with exceptions, NEI 99-03, Section 8.4 and Appendix F (Ref. 2). These compensatory measures may also be used as mitigating actions as required by Section 3.15.1.5. Temporary analytical methods may also be used as compensatory measures to restore OPERABILITY (Ref. 3). Options for restoring the CRE boundary to OPERABLE status include changing the licensing basis DBA consequence analysis, repairing the CRE boundary, or a combination of these actions. Depending upon the nature of the problem and the corrective action, a full scope inleakage test may not be necessary to establish that the CRE boundary has been restored to OPERABLE status.

References:

1. Regulatory Guide 1.196.
2. NEI 99-03, "Control Room Habitability Assessment Guidance", June 2001.
3. Letter from Eric J. Leeds (NRC) to James W. Davis (NEI) dated January 30, 2004, "NEI Draft White Paper, Use of Generic Letter 91-18 Process and Alternative Source Terms in the Context of Control Room Habitability." (ADAMS Accession No. ML040300694).

TMI-1's kinetic expansion repairs installed in the 1980's, and without flaws exceeding the criteria of 6.19.c.1.b, may remain in service subject to the requirements of TS Sections 3.1.1.2, 4.19, and 6.19.

TMI-1's 80" Inconel-690 rolled sleeves installed in 1991 and 1993, and without flaws exceeding the repair criteria of 6.19.c.2 or 6.19.c.3, may remain in service subject to the requirements of TS Sections 3.1.1.2, 4.19, and 6.19.

Installation of new repair methods, additional kinetic expansions, or additional sleeves, requires prior NRC approval.

NOTE: Refer to Section 6.9.6 for reporting requirements for periodic SG tube inspections.

→ INSERT 6.20

Insert to TMI Unit 1 TS Page 6-29

6.20
~~6.19~~ Control Room Envelope Habitability Program

A Control Room Envelope (CRE) Habitability Program shall be established and implemented to ensure that CRE habitability is maintained such that, with an OPERABLE Emergency Control Room Air Treatment System, CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under design basis accident (DBA) conditions without personnel receiving radiation exposures in excess of 5 rem total effective dose equivalent (TEDE) for the duration of the accident. The program shall include the following elements:

a. The definition of the CRE and the CRE boundary.

b. Requirements for maintaining the CRE boundary in its design condition including configuration control and preventive maintenance.

c. Requirements for (i) determining the unfiltered air inleakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.

d. Measurement, at designated locations, of the CRE pressure relative to all external areas adjacent to the CRE boundary during the pressurization mode of operation by one train of the Control Room Ventilation System, operating at the design flow rate, at a Frequency of 24 months. The results shall be trended and used as part of the 24 month assessment of the CRE boundary.

e. The quantitative limits on unfiltered air inleakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air inleakage measured by the testing described in paragraph c. The unfiltered air inleakage limit for radiological challenges is the inleakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air inleakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis.

f. The provisions of Section 1.25 are applicable to the frequencies for assessing CRE habitability, determining CRE unfiltered inleakage, and measuring CRE pressure and assessing the CRE boundary as required by paragraphs c and d, respectively.