ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION CHANGES

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
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H. CONTROL ROOM AIR FILTRATION SYSTEM

1. The control room air filtration system shall be operable at all times when containment integrity is required.

2. From the date that the control room air filtration system becomes and remains inoperable for any reason, operations requiring containment integrity are permissible only during the succeeding 3.5 days. At the end of this 3.5 days period, if the conditions for the control room air filtration system cannot be met, the reactor shall be placed in the hot shutdown condition utilizing normal operating procedures. If the conditions are not satisfied within an additional 48 hours, the reactor shall be placed in the cold shutdown condition utilizing normal operating procedures.

I. CABLE TUNNEL VENTILATION FANS

1. The reactor shall not be made critical unless the two cable tunnel ventilation fans are operable.

2. During power operation, the requirement of 3.3.I.1 may be modified to allow one cable tunnel ventilation fan to be inoperable for seven days, provided the other fan is operable.

The exhaust line penetrates the containment and then is divided into two parallel lines. Each parallel line contains a pressure sensor and all the valves necessary for controlling the venting operation. The two lines then rejoin and the exhaust passes through a flow sensor and a temperature sensor before passing through roughing, HEPA and charcoal filters. The exhaust is then directed to the plant vent.

The post-accident containment venting system is a passive system in the sense that a differential pressure between the containment and the outside atmosphere provides the driving force for the venting process to take place. The system is designed such that a minimum internal containment pressure of 2.14 psig is required for the system to operate properly.

The flow rate and the duration of venting required to maintain the hydrogen concentration at or below 3 percent of the containment volume are determined from the containment hydrogen concentration measurements and the hydrogen generation rate. The containment pressure necessary to obtain the required vent flow is then determined. Using one of the air compressors, hydrogen-free air is pumped into the containment until the required containment pressure is reached. The air supply is then stopped and the supply/exhaust line is isolated by valves outside the containment. The addition of air to pressurize the containment dilutes the hydrogen; therefore, the containment will remain isolated until analysis of samples indicates that the concentration is again approaching 3 percent by volume. Venting will then be started. This process of containment pressurization followed by venting is repeated as may be necessary to maintain the hydrogen concentration at or below 3 volume percent.

The post-accident venting system is used only in the absence of hydrogen recombiners and only when absolutely necessary. From the standpoint of minimizing offsite radiation doses, the optimum starting time for the venting system, if needed, is the latest possible time after the accident. Consistent with this philosophy, the selected venting initiation point of 3 percent hydrogen maximizes the time period before venting is required while at the same time allows a sufficient margin of safety below the lower flammability limit of hydrogen.

The control room air filtration system is designed to filter the control room atmosphere for intake air and/or for recirculation during control room isolation conditions. The control room system is designed to automatically start upon control room isolation. Control room isolation is initiated either by a safety injection signal or by detection of high radioactivity in the control room. If the control room air filtration system is found to be inoperable, there is no immediate threat to the control room and reactor operation may continue for a limited period of time while repairs are being made. If the system cannot be repaired within 3.5 days, the reactor is placed in the hot shutdown condition.

The cable tunnel is equipped with two temperature-controlled ventilation fans. Each fan has a capacity of 21,000 cfm and is connected to a 480v bus. One fan will start automatically when the temperature in the tunnel reaches 100°F. Under the worst conditions, i.e., loss of outside power and all the Engineered Safety Features in operation, one ventilation fan is capable of maintaining the tunnel temperature below 104°F. Under the same worst conditions, if no ventilation fans were operating, the natural air circulation through the tunnel would be sufficient to limit the gross tunnel temperature to below the tolerable value of 140°F. However, in order to provide for ample tunnel ventilation capacity, the two ventilation fans are required to be operable when the reactor is made critical. If one ventilation fan is found inoperable, the other fan will ensure that cable tunnel ventilation is available.

Valves 856A, C, D and E are maintained in the open position during plant operation to assure a flow path for high-head safety injection during the injection phase of a loss-of-coolant accident. Valves 856B and F are maintained in the closed position during plant operation to prevent hot-leg injection during the injection phase of a loss-of-coolant accident. As an additional assurance of preventing hot-leg injection, the valve motor operators are de-energized to prevent spurious opening of these valves. Power will be restored to these valves at an appropriate time in accordance with plant operating procedures after a loss-of-coolant accident in order to establish hot-leg recirculation.

Valves 842 and 843 in the mini-flow return line from the discharge of the safety injection pumps to the refueling water storage tank are de-energized in the open position to prevent an extremely unlikely spurious closure which would cause the safety injection pumps to overheat if the reactor coolant system pressure is above the shutoff head of the pumps.

The specified quantities of water for the RWST include unavailable water (4687 gals) in the tank bottom, inaccuracies (24,800 gals) in the alarm setpoints, the minimum quantity required during the injection (246,000 gals)[12] for accident mitigation and the minimum quantity required during the recirculation phase (60,000 gals) for accident mitigation. The minimum RWST inventory (i.e., 345,000 gals) provides approximately 9,500 gallons margin.

4. At least once every Refueling Interval(#) by:

a. verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches water gauge while operating the system at ambient conditions and at a flow rate of 1840 cfm ±10%.

b. verifying that, on a Safety Injection Test Signal or a high radiation signal in the control room, the system automatically switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks. [1]

c. verifying that the system maintains the control room at a neutral or positive pressure relative to the outside atmosphere during system operation.

5. After each complete or partial replacement of an HEPA filter bank, by verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at ambient conditions and at a flow rate of 1840 cfm ±10%.

6. After each complete or partial replacement of a charcoal adsorber bank, by verifying that the charcoal adsorbers remove greater than or equal to 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at ambient conditions and at a flow rate of 1840 cfm ±10%.

F. FUEL STORAGE BUILDING AIR FILTRATION SYSTEM

The fuel storage building air filtration system specified in Specification 3.8 shall be demonstrated operable:

1. At least once per 31 days by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 minutes.

Description of Proposed Changes:

1) T.S. 3.3.H.3: delete this section in its entirety.

2) T.S. 3.3. Basis pages 3.3-15 and 3.3-16: delete the description of the toxic gas monitoring system beginning with the last paragraph on page 3.3-15 "The control room ventilation system is equipped with a toxic gas ..." through the second paragraph on page 3.3-16 "... Study dated June 10, 1991."

3) T.S. 4.5.E.7: delete this section in its entirety.

All of the above Specifications and associated Bases will be transferred as written to UFSAR. Any subsequent changes to the above provisions will be controlled in accordance with 10 CFR 50.59 and 10 CFR 50.71 (e).

Discussion:

The NRC has issued Generic Letter 95-10 to provide guidance to Licensees to relocate certain instrumentation requirements to Licensee controlled documents or programs. Relocating these requirements will reduce costs for Licensees by allowing them to change these requirements without necessarily amending their licenses. The relocation of these requirements will also reduce NRC staff time by decreasing the number of plant specific changes to the affected Technical Specifications. The staff has concluded that the specifications listed in the Generic Letter were not required to be included in the Technical Specifications required by 10 CFR 50.36. The improved standard Technical Specifications also reflect the staff's position that these requirements do not meet the 10 CFR 50.36 criteria for inclusion in Technical Specifications. The staff also concluded that the instrumentation addressed in these specifications are not related to dominant contributors to plant risk.

The proposed changes are administrative in nature because the instrumentation requirements for the plant remain the same. However, the location where these requirements reside and the applicable regulatory requirements for their modification will be different. The proposed changes do not represent a change in the configuration or operation of the plant. The proposed changes will not affect any system or functional or operability requirements. Once in the UFSAR, future changes to these requirements will be controlled under 10 CFR 50.59.

Basis for No Significant Hazards Consideration Determination

The proposed changes do not involve a significant hazards consideration because:

1. **There is no significant increase in the probability or consequences of an accident previously evaluated.**

The proposed changes are administrative in nature. The Specifications and associated Bases will be transferred verbatim to the UFSAR.

These changes do not affect possible initiating events for accidents previously evaluated or alter the configuration or operating of the facility. The Limiting Safety Systems Settings and Safety Limits specified in the current Technical Specifications remain unchanged. Therefore, the proposed changes to the subject Technical Specification would not increase the probability or consequences of an accident previously evaluated.

2. **The possibility of a new or different kind of accident from any accident previously evaluated has not been created.**

As stated above, the proposed changes are administrative in nature. The safety analysis of the facility remains complete and accurate. There are no physical changes to the facility, and the plant conditions for which the design basis accidents have been evaluated are still valid. The operating procedures and emergency procedures are unaffected. Consequently, no new failure modes are introduced as a result of the proposed changes. Therefore, the proposed changes will not initiate any new or different kind of accident.

3. **There has been no significant reduction in the margin of safety.**

The proposed changes are administrative in nature. Since there are no changes to the operation of the facility or physical design, the Updated Final Safety Analysis Report (UFSAR) design basis, accident assumptions are not affected. Therefore, the proposed changes will not result in a reduction in the margin of safety.

The proposed changes have been reviewed by both the Station Nuclear Safety Committee (SNSC) and the Con Edison Nuclear Facility Safety Committee (NFSC). Both Committees concur that the proposed changes do not represent a significant hazards consideration.