

**U.S. Nuclear Regulatory Commission Staff Disposition of Comments to *Federal Register* Notice for Comment Technical Specifications Task Force Traveler TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 Hours per Month"**

The proposed model safety evaluation (SE) of TSTF-522 was published for comment in the *Federal Register* on March 22, 2012 (77 FR 16869). Comments were received from Mr. Brian Mann on behalf of the Technical Specifications Task Force (TSTF) on April 23, 2012 (Agencywide Documents Access and Management System Accession No. ML12115A305).

The changes recommended by the TSTF are listed below (paragraph location has changed due to restructuring of the SE to meet new LIC-101 guidance). Recommended additions are in italics and deletions are struck through. The NRC staff agreed with all the recommended changes and has incorporated them into the SE, with minor editorial revisions.

- Section 1.0, "Introduction," third paragraph:

The proposed change would revise Surveillance Requirements (SRs) which currently require operating the ~~heaters in~~ ventilation systems for at least [10 continuous hours] *with the heaters operating every 31 days* ~~[every 31 days]~~ / *[at a frequency controlled in accordance with the Surveillance Frequency Control Program]*. The SRs would be changed to require at least 15 continuous minutes of *ventilation system heater-operation* ~~[with the heaters operating]~~ *every 31 days* ~~[every 31 days]~~ / *[at a frequency controlled in accordance with the Surveillance Frequency Control Program]*.

- Section 1.0, "Introduction," fifth through ninth paragraphs:

In particular SRs [varies by paragraph] , which currently require operating the ~~heaters in the~~ respective systems for at least 10 continuous hours *with heaters operating every 31 days* ~~[every 31 days]~~ / *[at a frequency controlled in accordance with the Surveillance Frequency Control Program]*, would be changed to require at least 15 continuous minutes of *ventilation system heater-operation* ~~[with heaters operating]~~ *every 31 days* ~~[every 31 days]~~ / *[at a frequency controlled in accordance with the Surveillance Frequency Control Program]*.

- Section 2.0, "Regulatory Evaluation," second paragraph:

Current testing requirements for the air filtration and adsorption systems state that ~~heaters in the~~ systems should be operated for at least 10 continuous hours *with heaters operating every 31 days* ~~[every 31 days]~~ / *[at a frequency controlled in accordance with the Surveillance Frequency Control Program]*. These requirements are based on outdated NRC staff guidance for testing air filtration and adsorption systems. New NRC staff guidance states at least 15 continuous minutes of *ventilation system heater-operation* ~~with heaters operating every 31 days~~ is acceptable *for those plants that test ventilation system adsorption at a relative humidity of less than 95%. Plants that test ventilation system adsorption at a relative humidity of 95% do not require heaters for the ventilation system to perform its specified safety function and the bracketed phrase "with heaters operating" is not included in the Surveillance Requirements.*

- Section 2.0, "Regulatory Evaluation," ninth paragraph:

One of the reasons for the previous 10 hour requirement for *ventilation system heater*-operation *with heaters operating* was to minimize the effects of moisture on the adsorber's ability to capture gaseous activity. However, these effects are already accounted for in *the* Ventilation and Filter Testing Programs *by performing testing at a relative humidity of 95%*. The [PLANT] TS [5.5.11] Ventilation Filter Testing Program requires testing charcoal adsorbers in a manner to account for the effects of moisture on the adsorber's ability to capture gaseous activity. Therefore, the licensee proposed to remove the *requirement to operate heaters moisture elimination purpose* from SRs {for B&W Plants}[3.7.10.1, 3.7.12.1 and 3.7.13.1] {for Westinghouse Plants}[3.6.11.1 3.6.13.1, 3.7.10.1, 3.7.12.1, 3.7.13.1, and 3.7.14.1] {for Combustion Engineering Plants}[3.6.8.1, 3.6.10.1, 3.7.11.1, 3.7.13.1, 3.7.14.1 and 3.7.15.1] {for General Electric Plants}[3.6.4.3.1 and 3.7.4.1]..