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Dominion®

April 29, 2014

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

Serial No. 13-226H
LIC/CDS/R0
Docket No. 50-305
License No. DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
SUPPLEMENT 4 AND RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING LICENSE AMENDMENT REQUEST 256, PERMANENTLY DEFUELED LICENSE AND TECHNICAL SPECIFICATIONS

By application dated May 29, 2013 (Reference 1), Dominion Energy Kewaunee, Inc. (DEK), requested an amendment to Renewed Facility Operating License Number DPR-43 (Operating License) for Kewaunee Power Station (KPS). The proposed amendment would revise the KPS Operating License and Technical Specifications (TS) to Permanently Defueled Technical Specifications (PDTS), consistent with the permanently defueled status of the plant. The application was supplemented on October 15, 2013 (Reference 2), January 7, 2014 (Reference 3), and March 13, 2014 (Reference 4).

During discussions with the Nuclear Regulatory Commission (NRC) staff (Reference 5), the staff requested changes to certain portions of the proposed TS 5.5.10, "Explosive Gas and Storage Tank Radioactivity Monitoring Program." Additionally, the NRC transmitted a request for additional information (RAI) regarding DEK's proposed removal of License Condition 2.C.(10), "Mitigation Strategy License Condition" (Reference 6).

The RAI question and associated DEK response is provided in Attachment 1 to this letter.

Attachment 2 to this letter provides a supplement to the proposed amendment addressing the staff's requested changes. The conclusions of the no significant hazards consideration and the environmental considerations contained in Reference 1 are not affected by, and remain applicable to, this supplement. Attachments 3 and 4 provide markups of the Operating License and TS pages, respectively, for the proposed changes.

The originally requested June 1, 2014, approval date remains unchanged.

A001
NRR

Please contact Mr. Jack Gadzala at 920-388-8604 if you have any questions or require additional information.

Sincerely,

Mark D. Sartain
Vice President – Nuclear Engineering

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Mark D. Sartain, who is Vice President – Nuclear Engineering of Dominion Energy Kewaunee, Inc. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 29th day of April, 2014.

My Commission Expires: December 31, 2016.

Notary Public

CRAIG D SLY
Notary Public
Commonwealth of Virginia
Reg. # 7518653
My Commission Expires December 31, 2016

Attachments:

1. Response to Request for Additional Information
2. Discussion of Change and Technical Analysis
3. Marked Up License Pages
4. Marked Up Technical Specifications Pages

References:

1. Letter from Eugene S. Grecheck (DEK) to NRC Document Control Desk, "License Amendment Request 256, Permanently Defueled License and Technical Specifications," dated May 29, 2013. (ADAMS Accession No. ML13156A037)
2. Letter from Mark D. Sartain (DEK) to NRC Document Control Desk, "Supplement 1 and Response to Request for Additional Information Regarding License Amendment Request 256, Permanently Defueled License and Technical Specifications," dated October 15, 2013. (ADAMS Accession No. ML13294A091)
3. Letter from Mark D. Sartain (DEK) to NRC Document Control Desk, "Supplement 2: License Amendment Request 256, Permanently Defueled License and Technical Specifications," dated January 7, 2014. (ADAMS Accession No. ML14009A393)

4. Letter from Mark D. Sartain (DEK) to NRC Document Control Desk, "Supplement 3: License Amendment Request 256, Permanently Defueled License and Technical Specifications," dated March 13, 2014. (ADAMS Accession No. ML14084A384)
5. Teleconference between NRC staff and DEK representatives regarding final review status of certain portions of Kewaunee Power Station Permanently Defueled Technical Specifications on February 24, 2014.
6. Email from William C. Huffman, Jr. (NRC) to Jack Gadzala (DEK) et al, "Draft RAI related to Kewaunee proposed deletion of License Condition on Mitigation Strategy," dated April 1, 2014.

Commitments made by this letter: None

cc: Regional Administrator, Region III
U. S. Nuclear Regulatory Commission
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ATTACHMENT 1

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION:
LICENSE AMENDMENT REQUEST 256
PERMANENTLY DEFUELED LICENSE AND TECHNICAL SPECIFICATIONS

KEWAUNEE POWER STATION
DOMINION ENERGY KEWAUNEE, INC.

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION: LICENSE AMENDMENT REQUEST 256 PERMANENTLY DEFUELED LICENSE AND TECHNICAL SPECIFICATIONS

By application dated May 29, 2013 (Reference 1), Dominion Energy Kewaunee, Inc. (DEK), requested an amendment to Renewed Facility Operating License Number DPR-43 (Operating License) for Kewaunee Power Station (KPS). The proposed amendment would revise the KPS Operating License and Technical Specifications (TS) to Permanently Defueled Technical Specifications (PDTS), consistent with the permanently defueled status of the plant. The application was supplemented on October 15, 2013 (Reference 2), January 7, 2014 (Reference 3), and March 13, 2014 (Reference 4).

Subsequently, the Nuclear Regulatory Commission (NRC) transmitted a request for additional information (RAI) regarding the proposed removal of License Condition 2.C.(10), "Mitigation Strategy License Condition," in the amendment (Reference 5). The RAI question and associated DEK response is provided below.

NRC Question

The licensee is requesting to remove License Condition 2.C.(10), "Mitigation Strategy License Condition," from the license. This License Condition requires the licensee to develop and maintain strategies for addressing large fires and explosions. As stated in the amendment request, in accordance with 10 CFR 50.54 (hh)(3), the requirements in 10 CFR 50.54(hh)(2) will not apply after both certifications have been filed under 10 CFR 50.82.

The Commission added 10 CFR 50.54(hh)(3) in the Power Reactor Security Requirements final rule in response to a comment that the requirements of 10 CFR 50.54(hh) should not apply to "reactor facilities currently in decommissioning and for which the certifications required under 10 CFR 50.82(a)(1) have been submitted" because "it is inappropriate that 10 CFR 50.54(hh) should apply to a permanently shut-down and defueled reactor where the fuel was removed from the site or moved to an [ISFSI]." 74 Fed. Reg. 13933 (Mar. 27, 2009) (emphasis added). The NRC stated in the Statement of Considerations for the final rule that it "agree[d] with this comment and revised the final requirements in 10 CFR 50.54(hh) so they do not apply to facilities for which certifications have been filed under 10 CFR 50.82(a)(1) or 10 CFR 52.110(a)(1)."Id. The NRC staff position expressed in this Statement of Considerations does not express a conclusion that continued storage of fuel in the spent fuel pool of a reactor facility without the mitigating strategies would provide reasonable assurance that the health and safety of the public would not be endangered and would not be inimical to the common defense and security, which is necessary to conclude that amendment of License DPR-43 to remove License Condition 2.C.(10) would be appropriate.

While the plain language of 10 CFR 50.54(hh)(3) exempts all facilities that have submitted cessation of operation certifications without regard to whether there is still fuel onsite that is not in an ISFSI – i.e., fuel in the pool, NRR has recognized that this may not be a proper resolution of the comment to the Power Reactor Security Rulemaking and currently is considering rulemaking to affect changes to apply the 10 CFR 50.54(hh)(2) requirements to decommissioning facilities with fuel still in the spent fuel pool.

Given that the licensee must continue to provide adequate emergency response under 10 CFR 50.47, and that the spent fuel must be protected against the design basis threat of radiological sabotage under 10 CFR 73.55, for each element of the License Condition 2.C.(10), provide justification that elimination of that element will not result in operations that would endanger the health and safety of the public or be inimical to the common defense and security, or otherwise, indicate that the element will be maintained in effect:

2.C.(10) Mitigation Strategy License Condition

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

Response:

DEK proposes that all 14 elements of License Condition 2.C.(10), "Mitigation Strategy License Condition," be maintained in effect. The proposed changes in the original application (Reference 1) included deletion of License Condition 2.C.(10). This license condition provides mitigation strategy and response procedure requirements for loss of large areas of the plant due to large area fires and explosions. The proposed deletion of this license condition was based on 10 CFR 50.54(hh)(3), which states that 10 CFR 50.54(hh) no longer applies to a permanently defueled reactor that has submitted the certifications under 10 CFR 50.82(a).

Based on 10 CFR 50.54(hh)(3), DEK concluded that 10 CFR 50.54(hh) was no longer applicable to KPS, since DEK had submitted the certifications required by 10 CFR 50.82(a). However, the statements in the NRC's RAI (Reference 5) indicate that the 50.54(hh) mitigating strategies should continue to apply to plants who have submitted the certifications under 50.82(a) but that continue to store spent fuel in the spent fuel pool. Therefore, a license condition for mitigation strategies associated with the spent fuel pool continues to be necessary because spent fuel assemblies are currently being stored in the KPS spent fuel pool.

In response to the staff's comments, DEK is retracting the originally proposed deletion of License Condition 2.C.(10). As a result, DEK proposes that License Condition 2.C.(10) remain in effect and unchanged.

The 14 elements contained in License Condition 2.C.(10) require strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities as described in the NRC safety evaluation (SE) that provided the basis for issuance of the license condition (Reference 6). For a permanently defueled facility, strategies to maintain or restore core cooling and containment capabilities are no longer required. As discussed in the NRC RAI (Reference 5), the remaining purpose of this license condition is to require administrative controls for spent fuel pool mitigation strategy while spent fuel assemblies are stored in the spent fuel pool (consistent with the statements regarding the intent of 10 CFR 50.54(hh)).

The SE that issued License Condition 2.C.(10) (Reference 6) described the appropriate process for changes to the underlying implementing details of the required mitigating strategies. It contains, *inter alia*, the following two statements.

1. The required strategies for all three phases would be covered by the license condition and all implementing details would be managed by NEI 99-04 [commitment management process].
2. If the licensee makes future changes to its strategies within its commitment management program, this SE will be useful to the NRC staff in determining if the changed strategies are adequate to meet the license condition.

As such, those measures that are no longer necessary considering the permanently defueled status of the facility may be appropriately changed using the process described in the SE. Those mitigation strategy measures needed to protect the spent fuel pool will continue to be required by License Condition 2.C.(10).

Attachment 2 contains a supplement to the proposed amendment which requests that License Condition 2.C.(10) be maintained as it currently exists.

References

1. Letter from Eugene S. Grecheck (DEK) to NRC Document Control Desk, "License Amendment Request 256, Permanently Defueled License and Technical Specifications," dated May 29, 2013. (ADAMS Accession No. ML13156A037)
2. Letter from Mark D. Sartain (DEK) to NRC Document Control Desk, "Supplement 1 and Response to Request for Additional Information Regarding License Amendment Request 256, Permanently Defueled License and Technical Specifications," dated October 15, 2013. (ADAMS Accession No. ML13294A091)
3. Letter from Mark D. Sartain (DEK) to NRC Document Control Desk, "Supplement 2: License Amendment Request 256, Permanently Defueled License and Technical Specifications," dated January 7, 2014.
4. Letter from Mark D. Sartain (DEK) to NRC Document Control Desk, "Supplement 3: License Amendment Request 256, Permanently Defueled License and Technical Specifications," dated March 13, 2014. (ADAMS Accession No. ML14084A384)
5. Email from William C. Huffman, Jr. (NRC) to Jack Gadzala (DEK) et al, "Draft RAI related to Kewaunee proposed deletion of License Condition on Mitigation Strategy," dated April 1, 2014.
6. Letter (and enclosed Safety Evaluation) from Margaret H. Chernoff (NRC) to David A. Christian (DEK), "Kewaunee Power Station - Conforming License Amendment to Incorporate the Mitigation Strategies Required by Section B.5.b. of Commission Order EA-02-026 (TAC NO. MD4543)," dated August 2, 2007.

ATTACHMENT 2

SUPPLEMENT 4:
LICENSE AMENDMENT REQUEST 256
PERMANENTLY DEFUELED LICENSE AND TECHNICAL SPECIFICATIONS

DISCUSSION OF CHANGE AND TECHNICAL ANALYSIS

KEWAUNEE POWER STATION
DOMINION ENERGY KEWAUNEE, INC.

SUPPLEMENT 4
LICENSE AMENDMENT REQUEST 256
PERMANENTLY DEFUELED LICENSE AND TECHNICAL SPECIFICATIONS

DISCUSSION OF CHANGE AND TECHNICAL ANALYSIS

1.0 DESCRIPTION

By application dated May 29, 2013 (Reference 1), Dominion Energy Kewaunee, Inc. (DEK), requested an amendment to Renewed Facility Operating License Number DPR-43 (Operating License) for Kewaunee Power Station (KPS). The proposed amendment would revise the KPS Operating License and Technical Specifications (TS) to Permanently Defueled Technical Specifications (PDTS), consistent with the permanently defueled status of the plant. The application was supplemented on October 15, 2013 (Reference 2), January 7, 2014 (Reference 3), and March 13, 2014 (Reference 4).

As recently discussed with NRC staff (Reference 5), and in a subsequent request for additional information (Reference 6), the staff requested changes to certain portions of the proposed Technical Specifications regarding TS 5.5.10, "Explosive Gas and Storage Tank Radioactivity Monitoring Program," and to the proposed license regarding License Condition 2.C.(10), "Mitigation Strategy License Condition."

This supplement to the proposed amendment addresses the staff's requested changes. Attachments 3 and 4 provide markups of the Operating License and TS pages, respectively, reflecting the proposed changes.

2.0 PROPOSED CHANGE

License Condition 2.C.(10), "Mitigation Strategy License Condition"

The originally proposed request to delete the second paragraph of License Condition 2.C.(10), regarding mitigating strategy provisions, is hereby retracted. This paragraph will be maintained unchanged as shown below.

(10) Mitigation Strategy License Condition

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

Attachment 3 contains the marked-up License page affected by this revision.

Indicated revisions to other sections appearing on this license page in Attachment 2 are shown as previously proposed in the original request (Reference 1), as supplemented by Reference 3, and remain marked up for consistency with these previous submittals.

The conclusions of the no significant hazards consideration and the environmental considerations contained in Reference 1 are not affected by, and remain applicable to, this revision.

TS 5.5.10, "Explosive Gas and Storage Tank Radioactivity Monitoring Program"

During a discussion with NRC staff (Reference 5), the staff requested changes to certain portions of the proposed Technical Specifications. Specifically, the staff requested that portions of the Explosive Gas and Storage Tank Radioactivity Monitoring Program, currently required by TS 5.5.10, be maintained to the extent required to support storage of liquid radioactive waste that might be generated in the future.

In response to the staff's comments, DEK is revising the originally proposed amendment. Rather than deleting TS 5.5.10 in its entirety, the revised request maintains the portions of the program to the extent required to support storage of liquid radioactive waste that might be generated in the future.

Attachment 4 contains the marked-up TS pages affected by this revision. Proposed additions to the currently existing TS 5.5.10 are shown in underlined text. Deletions are shown in strikethrough text. Indicated revisions to other sections appearing in Attachment 3 are shown as previously proposed in the original request (Reference 1) and remain marked up for consistency with previous submittals.

The conclusions of the no significant hazards consideration and the environmental considerations contained in Reference 1 are not affected by, and remain applicable to, this revision.

3.0 TECHNICAL ANALYSIS

License Condition 2.C.(10), "Mitigation Strategy License Condition"

Retraction of the originally proposed change results in no change being proposed to the currently existing License Condition 2.C.(10), "Mitigation Strategy License Condition." License Condition 2.C.(10) is therefore being maintained as it currently exists. Maintaining this license condition unchanged has no impact on the remainder of the changes proposed in LAR 256 (Reference 1).

TS 5.5.10, "Explosive Gas and Storage Tank Radioactivity Monitoring Program"

The technical analysis for this revision is unchanged from that provided in LAR 256 (Reference 1). The original justification for deletion of TS 5.5.10 in its entirety remains applicable to the partial deletion being proposed herein.

KPS is a permanently shutdown facility with spent fuel stored in the spent fuel pool and independent spent fuel storage installation (ISFSI). The reactor coolant system (RCS) has been drained and vented. 10 CFR 50.82(a)(2) prohibits operation of the reactor or placement or retention of fuel into the reactor vessel. Consequently, there is no longer a continuing source of radioactive gases being produced to contribute to the contents of storage tanks (which was the purpose of this program).

Although KPS currently has no outdoor liquid radwaste tanks, maintaining the existing portions of this program that are applicable to such tanks would ensure that appropriate controls remain in place should such tanks be constructed and placed into service in the future.

4.0 SUMMARY

License Condition 2.C.(10), "Mitigation Strategy License Condition," is being maintained unchanged.

The revisions being proposed in this supplement to TS 5.5.10, "Explosive Gas and Storage Tank Radioactivity Monitoring Program," ensure appropriate requirements for administrative controls.

These supplemental changes have no impact on the remainder of the changes proposed in LAR 256 (Reference 1), as supplemented.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Consideration

The conclusions of the no significant hazards consideration contained in Reference 1 are not affected by, and remain applicable to, this proposed change.

5.2 Applicable Regulatory Requirements/Criteria

The applicable regulatory requirements/criteria contained in Reference 1 are not affected by, and remain applicable to, this proposed change.

6.0 ENVIRONMENTAL CONSIDERATION

The conclusions of the environmental considerations contained in Reference 1 are not affected by, and remain applicable to, this proposed change.

7.0 REFERENCES

1. Letter from Eugene S. Grecheck (DEK) to NRC Document Control Desk, "License Amendment Request 256, Permanently Defueled License and Technical Specifications," dated May 29, 2013 (ADAMS Accession No. ML13156A037)
2. Letter from Mark D. Sartain (DEK) to NRC Document Control Desk, "Supplement 1 and Response to Request for Additional Information Regarding License Amendment Request 256, Permanently Defueled License and Technical Specifications," dated October 15, 2013 (ADAMS Accession No. ML13294A091)
3. Letter from Mark D. Sartain (DEK) to NRC Document Control Desk, "Supplement 2: License Amendment Request 256, Permanently Defueled License and Technical Specifications," dated January 7, 2014. (ADAMS Accession No. ML14009A393)
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5. Teleconference between NRC staff and DEK representatives, regarding final review status of certain portions of Kewaunee Power Station Permanently Defueled Technical Specifications, on February 24, 2014
6. Email from William C. Huffman Jr (NRC) to Jack Gadzala (DEK) et al, "Draft RAI related to Kewaunee proposed deletion of License Condition on Mitigation Strategy," dated April 1, 2014.

ATTACHMENT 3

SUPPLEMENT 4:
LICENSE AMENDMENT REQUEST 256
PERMANENTLY DEFUELED LICENSE AND TECHNICAL SPECIFICATIONS

MARKED UP LICENSE PAGES

KEWAUNEE POWER STATION
DOMINION ENERGY KEWAUNEE, INC.

(4) Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21 is entitled: "Nuclear Management Company Kewaunee Nuclear Power Plant Physical Security Plan (Revision 0)" submitted by letter dated October 18, 2004, and supplemented by letter dated October 21, 2004, July 26, 2005, and May 15, 2006.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 210.

(5) Deleted

(6) Deleted~~Steam Generator Upper Lateral Supports~~

~~The design of the steam generator upper lateral supports may be modified by reducing the number of snubbers from four (4) to one (1) per steam generator.~~

NOTE: Deletion of License Condition 2.C.(6) is justified separately in LAR 256.

(7) Deleted

(8) Deleted

(9) Deleted

(10) Mitigation Strategy License Condition

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

(11) Seismic Analysis Methodology for Auxiliary Building Crane

The licensee shall use the seismic analysis methodology submitted by letter dated July 7, 2008, supplemented on September 19, 2008, and March 17, 2009, and approved by the NRC staff in Amendment No. 205, for analysis of the Auxiliary Building crane. The licensee shall update the USAR to reflect this approval and in accordance with the schedule specified by 10 CFR 50.71(e).

(12) Implementation of New and Revised Surveillance Requirements

(a) For Surveillance Requirements (SRs) that are new in Amendment No. 207, the first performance is due at the end of the first surveillance interval, which begins on the date of implementation of that amendment.

(b) For SRs that existed prior to Amendment No. 207 whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of that amendment.

(c) For SRs that existed prior to Amendment No. 207 that have modified acceptance criteria, the first performance subject to the modified acceptance criteria is due at the end of the surveillance interval that began on the date the surveillance was last performed prior to the implementation of that amendment.

(d) For SRs that existed prior to Amendment No. 207 whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of that amendment.

ATTACHMENT 4

SUPPLEMENT 4:
LICENSE AMENDMENT REQUEST 256
PERMANENTLY DEFUELED LICENSE AND TECHNICAL SPECIFICATIONS

MARKED UP TECHNICAL SPECIFICATIONS PAGES

KEWAUNEE POWER STATION
DOMINION ENERGY KEWAUNEE, INC.

5.5 Programs and Manuals

~~5.5.9 Ventilation Filter Testing Program (VFTP) (continued)~~

~~d. Demonstrate for each of the safety related systems listed below that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the value specified below when tested in accordance with ANSI N510-1975 at the system flowrate specified below ± 10%.~~

NOTE: Deletion of TS 5.5.9 is justified separately in LAR 256.

~~Safety Related System~~	~~Combined Delta P (in. wc)~~	~~Flow Rate (cfm)~~
~~SBVS~~	~~< 6.3~~	~~5700~~
~~ASV System~~	~~< 6.3~~	~~9000~~
~~CRPAR System~~	~~< 2.4~~	~~2500~~

~~e. Demonstrate for each of the safety related systems listed below that when tested at the system flowrate specified below (± 10%) the air distribution is uniform within ± 20%.~~

~~Safety Related System~~	~~Flow Rate (cfm)~~
~~SBVS~~	~~5700~~
~~ASV System~~	~~9000~~

~~The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.~~

5.5.10 ~~Explosive Gas and~~ Storage Tank Radioactivity Monitoring Program

This program provides controls for ~~potentially explosive gas mixtures contained in the Gaseous Radioactive Waste Disposal System, the quantity of radioactivity contained in gas storage tanks or fed into the offgas treatment system, and~~ the quantity of radioactivity contained in unprotected outdoor liquid storage tanks. ~~The gaseous radioactivity quantities shall be determined following the methodology in Branch Technical Position (BTP) ETSB 11-5, "Postulated Radioactive Release due to Waste Gas System Leak or Failure."~~ The liquid radwaste quantities shall be determined in accordance with Standard Review Plan, Section 15.7.3, "Postulated Radioactive Release due to Tank Failures."

The program shall include:

a. ~~The limits for concentrations of hydrogen and oxygen in the Gaseous Radioactive Waste Disposal System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion);~~

~~5.5.10 Explosive Gas and Storage Tank Radioactivity Monitoring Program (continued)~~

~~b. A surveillance program to ensure that the quantity of radioactivity contained in each gas storage tank and fed into the offgas treatment system is less than the amount that would result in a whole body exposure of ≥ 0.5 rem to any individual in an unrestricted area, in the event of an uncontrolled release of the tank's contents; and~~

~~c.~~ A surveillance program to ensure that the quantity of radioactivity contained in all outdoor liquid radwaste tanks that are not surrounded by liners, dikes, or walls, capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains connected to the Waste Disposal System is less than the amount that would result in concentrations less than the limits of 10 CFR 20, Appendix B, Table 2, Column 2, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the ~~Explosive Gas and~~ Storage Tank Radioactivity Monitoring Program Surveillance Frequencies.

5.5.11 Deleted~~Diesel Fuel Oil Testing Program~~

~~A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:~~

NOTE: Deletion of TS 5.5.11 is justified separately in LAR 256.

~~for use prior to addition to storage tanks by has:~~

~~1. An API gravity or an absolute specific gravity within limits;~~

~~2. A flash point and kinematic viscosity within limits for ASTM 2D fuel oil; and~~

~~3. A clear and bright appearance with proper color or a water and sediment content within limits;~~

~~b. Within 31 days following addition of the new fuel oil to storage tanks, verify that the properties of the new fuel oil, other than those addressed in a., above, are within limits for ASTM 2D fuel oil; and~~

~~c. Total particulate concentration of the fuel oil is ≤ 10 mg/l when tested every 92 days.~~

~~The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies.~~