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SUBJECT: Forwards License Amend Request 96-02 to Licenses DPR-80 &
 DPR-82, revising Tech Specs 3/4.7.5, "Control Room
 Ventilation Sys" & 3/4.7.6, "Auxiliary Bldg Safeguards Air
 Filtration Sys."

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April 3, 1996



PG&E Letter DCL-96-085

U.S. Nuclear Regulatory Commission
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Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2

License Amendment Request 96-06

Revision of Technical Specifications 3/4.7.5, "Control Room Ventilation System;"
3/4.7.6, "Auxiliary Building Safeguards Air Filtration System;" and 3/4.9.12, "Fuel
Handling Building Ventilation System" - Testing Methodologies for Filters

Dear Commissioners and Staff:

Enclosed is an application for a License Amendment Request (LAR) to clarify the testing methodology utilized by PG&E to determine the operability of the charcoal and high efficiency particulate air (HEPA) filters in the engineering safeguards features (ESF) air handling units at the Diablo Canyon Power Plant (DCPP).

Currently, as discussed in Licensee Event Reports 2-94-003, "Auxiliary Building Ventilation System Outside Design Basis Due to Previous Nonconservative ASTM Testing" and 2-94-005, "Fuel Handling Building Ventilation System Outside Design Basis Due to Previous Nonconservative ASTM Testing," DCPP tests the charcoal in the ESF ventilation systems per ASTM D 3803-1989. PG&E believes that testing per ASTM D 3803-1989 meets the intent of Regulatory Guide (RG) 1.52, "Design Testing and Maintenance Criteria for Post Accident Engineered Safety Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light Water Cooled Nuclear Power Plants" as required by Technical Specifications (TS) 3/4.7.5, "Control Room Ventilation System;" 3/4.7.6, "Auxiliary Building Safeguards Air Filtration System;" and 3/4.9.12, "Fuel Handling Building Ventilation System," since ASTM D 3803-1989 is the current NRC recommended standard for performing charcoal sample testing. The new standard TSs (NUREG-1431, Rev. 1) reference ASTM D 3803-1989 for charcoal sample testing. PG&E is in the process of converting to the new standard TSs

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as discussed in PG&E Letter DCL-95-275 dated December 19, 1995. PG&E was planning to explicitly reference ASTM D 3803-1989 as part of its standard TS conversion program.

Additionally, the DCPD TSs require that other filter testing, such as filter visual inspections and in-place leak testing of HEPA filters and adsorber banks, also be performed in accordance with RG 1.52. RG 1.52 references ANSI N510-1975. ANSI N510-1975 describes the requirements for the required testing. However, PG&E uses ANSI N510-1980 for this filter testing. Testing required in accordance with ANSI N510-1980 encompasses the testing required by ANSI N510-1975. The new standard TSs allow the referencing of plant specific standards that are used for these tests.

PG&E believes testing performed in accordance with ASTM D 3803-1989 and ANSI N510-1980 satisfies the DCPD TS requirements. However, to improve the clarity of the TSs, PG&E is revising the TSs to directly reference ASTM D 3803-1989 and ANSI N510-1980 for the subject testing.

The proposed changes are not required to address an immediate safety concern. Therefore, PG&E request that the NRC review this LAR on a medium priority. PG&E requests that the associated License Amendment (LA) be effective immediately upon issuance of the LA.

Sincerely,



Gregbry M. Rueger

cc: Edgar Bailey, DHS
Stéven D. Bloom
L. J. Callan
Kenneth E. Perkins
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Enclosures

/MRZ

