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AUTH.NAME AUTHOR AFFILIATION
BYRAM,R.G. Pennsylvania Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Provides suppl info re application of scrubbing methodology provisions of Section 6.5.5 of Standard Review Plan (NUREG-0800) & evaluation of conformance to "acceptance criteria."

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PP&L Pennsylvania Power & Light Company
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

Robert G. Byram
Senior Vice President-Nuclear
610/774-7502
Fax: 610/774-5019

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SUSQUEHANNA STEAM ELECTRIC STATION
SUPPLEMENTAL INFORMATION
APPLICATION OF STANDARD REVIEW PLAN PROVISIONS
PLA-4510 FILE R41-2

Docket Nos. 50-387
and 50-388

Reference: *PLA-4500, "Application of Standard Review Pan 6.5.5 Provisions, Secondary Containment Bypass Leakage Criteria," dated September 12, 1996.*

As requested by your Mr. C. Poslusny in a September 1996 telephone discussion with our Mr. James Kenny, this letter provides supplemental information regarding application of the scrubbing methodology provisions of Section 6.5.5 of the Standard Review Plan (NUREG-0800). In addition to describing PP&L's general approach to applying the methodology, this letter provides our evaluation of conformance to the "acceptance criteria" defined within Standard Review Plan (SRP) Section 6.5.5.

Change Definition

Application of the provisions of SRP 6.5.5 represents a change to the methodology utilized to evaluate the radiological dose consequences of the DBA LOCA, described in FSAR Chapter 15. The change in methodology allowed a revision of input assumptions, and specifically allows an increase in the assumed Secondary Containment Bypass Leakage (SCBL) from 5 scfh to 9 scfh, with no increase in the onsite/offsite radiological dose consequences. The staff found the SRP methodology to be superior to former techniques in that it acknowledges the physical phenomenon of pool scrubbing, which will occur during the postulated DBA-LOCA. Prior techniques did not provide for such treatment.

This SCBL assumption of 5 scfh was identified in Chapter 15 of the Final Safety Analysis Report. Consequently, in accordance with 10 CFR 50.59, a safety evaluation was performed. The safety evaluation, approved by our engineering staff and Plant Operations Review Committee, concluded that the change to the SAR could be implemented without prior Commission approval, as permitted by 10 CFR 50.59.

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Conformance Evaluation

The attachment to this letter is a summary matrix describing PP&L conformance to the acceptance criteria delineated in SRP Section 6.5.5. This conformance evaluation represented a critical element within the safety evaluation.

Radiological Dose Calculation

The current SSES DBA-LOCA dose calculation was revised to include the effect of suppression pool scrubbing as described in SRP Section 6.5.5. Suppression pool retention of iodine in the scrubbing process lessens the net amount of iodine available for release from primary containment to the environment, thereby reducing the radiological dose consequences of the DBA LOCA. SRP Section 6.5.5 permits a scrubbing decontamination factor (DF) of 10 to be applied with no requirement for independent evaluation by the NRC reviewer. Based on General Electric (GE) research (NEDO-25420) demonstrating realistic suppression pool decontamination factors of 100 to 1000 actually existing in practice, a suppression pool scrubbing DF of 10 was selected to be applied to the SSES DBA-LOCA methodology. This decontamination factor was then adjusted to account for suppression pool bypass leakage as required in SRP 6.5.5, and resulted in a net DF of 7.96. With this net scrubbing DF of 7.96 applied to the SSES DBA-LOCA methodology, the maximum containment bypass leakage flow which results in dose consequences in all categories to be below current Chapter 15.6.5 DBA-LOCA values was determined to be 9 scfh.

I hope this information is responsive to your needs. If you have any additional questions, please contact Mr. J. M. Kenny at (610) 774-7535.

Very truly yours,

R. G. Byram

Attachment: Table A: Evaluation of SSES Conformance to SRP 6.5.5

cc: NRC Region I
Mr. K. Jension, NRC Sr. Resident Inspector
Mr. C. Poslusny, NRC Sr. Project Manager

Table A: Evaluation of SSES Conformance to SRP 6.5.5

No.	References	Acceptance Criterion	SSES Conformance
1	SRP 6.5.5/II	The acceptance criteria for the fission product cleanup function of the suppression pool are based upon the relevant requirements of the following regulations: GDC 41 as it relates to the control of fission products following postulated accidents. GDC 42 as it relates to the periodic inspections of engineered safety features. GDC 43 as it relates to the periodic functional testing of engineered safety features.	Conformance of the SSES design with the provisions of these General Design Criteria is established in FSAR sections 3.1.2.4.12 through 3.1.2.4.14.
2	SRP 6.5.5/II	Specific Criterion #1: The drywell and its penetrations must be designed to ensure that, even with a single active failure, all releases from the reactor core must pass into the suppression pool, except for small bypass leakage.	As discussed in FSAR section 6.2.4, all drywell penetrations are designed to assure that two barriers against containment leakage exist, thereby taking into account the potential for a single active failure. This assures that all releases from the reactor core will pass through the suppression pool (with the exception of the small bypass leakage described in criterion #8 regarding pool bypass factor below). Furthermore, the design of the drywell is such that there is no other release pathway, other than the vent paths, which leads to the suppression pool. Therefore, compliance with this acceptance criteria is achieved.
3	SRP 6.5.5/II SRP 6.2.1.1.C	Specific Criterion #2: The bypass leakage assumed for purposes of evaluating fission product retention must be no less than that accepted in the review under SRP Section 6.2.1.1.C... Appendix A of SRP Section 6.2.1.1.C stipulates the suppression pool bypass leakage capability for SSES as *"The containment should have a steam bypass capability for small breaks of the order of: .05 ft^2 $(A/(k)^{1/2})$ for Mark II plants..."*	SSES has demonstrated steam bypass capability based on a design steam bypass of 0.0535 ft^2 $(A/(k)^{1/2})$ which bounds the bypass area recommended in Appendix A of SRP Section 6.2.1.1.c. Technical Specification 3.6.2.1 requires that the actual bypass area be less than 10% of the design bypass area of 0.0535 ft^2 $(A/(k)^{1/2})$ and demonstrates this by testing. As noted in SSER Supplement 3, the NRC staff concluded that the suppression pool bypass design and testing for SSES is in conformance with SRP 6.2.1.1.c. Furthermore, the analysis for evaluating fission product retention assumes a suppression pool bypass leakage area of 0.0535 ft^2 $(A/(k)^{1/2})$ despite the fact that TS 3.6.2.1 demonstrates by test that the actual bypass area is a factor of 10 less than the design value.

Table A: Evaluation of SSES Conformance to SRP 6.5.5

4	SRP 6.5.5/II	Specific Criterion #3: For plants that have already received a construction permit, the iodine retention calculated using this section must not be used to justify removal of the standby gas treatment or other filtered exhaust system from status as engineered safety features, and any change in plant design, proposed testing, surveillance or maintenance must be supported by considerations of lowered operator dose and other projected benefits. For such plants, the charcoal filters must be at least maintained to the minimum level of Table 2 in Regulatory Guide 1.52, Revision 2. [Note: At SSES, this requirement is applicable to both Standby Gas Treatment System (SGTS) and Control Structure Emergency Outside air Supply System (CSEOASS). It is to be noted that both of these systems are not in-containment recirculation systems, but rather are secondary systems as defined in the SRP Section 6.5.1.]	Per Table 2 of Regulatory Guide 1.52, Rev. 2, both the SGTS and CSEOASS filters are assigned 99% decontamination efficiencies both for Elemental iodine and Organic iodine based on testing to be performed per paragraph 5b of Table 5-1 of ANSI N509-1975. Currently, laboratory testing of charcoal is performed per ASTM D3803 (1979), method A and the efficiency requirement is 99.825%. ASTM D3803 (1979) is an updated standard for laboratory testing of charcoal identified in Table 5-1 of ANSI N509-1980. Therefore, the SSES method of laboratory testing of activated carbon exceeds the requirements identified in R.G. 1.52, Rev. 2. New charcoal for these systems is procured under PP&L specification M1455, Rev.0 which specifies Regulatory Guide 1.52, Rev. 2 (1978), ANSI N509 (1980 implied), and ASTM D3803 (1979). Therefore it meets the applicable requirements of paragraph 3.0 of SRP 6.5.5.
5	SRP 6.5.5/II SRP 6.5.5/ III/1	Acceptable methods for computing fission product retention by the suppression pool are given in subsection III, "REVIEW PROCEDURES." Pool Decontamination Factor: "...If the time-integrated DF values claimed by the applicant for removal of particulate and elemental iodine are 10 or less for a Mark II or a Mark III containment, or are 5 or less for a Mark I containment, the applicant's values may be accepted without any need to perform calculations. A DF value of one (no retention) should be used for noble gases and for organic iodides. The applicant should provide justification for any DF values greater than those given above."	The decontamination factor to be used in the radiological analysis was determined using the equation and guidance provided in the in SRP 6.5.5. This determination is documented in calculation EC-LOCA-1003, revision 1, which determined a decontamination factor of 7.97. Since this is less than the value of 10 specified in the SRP for a Mark II containment, this criteria is satisfied. It should be further noted that the basis for comparison to 10 for SSES is appropriate for the minimum suppression pool level of 22 feet based on the results of NEDO-25420, where GE performed a generic evaluation of suppression pool scrubbing for BWRs.

Table A: Evaluation of SSES Conformance to SRP 6.5.5

6	SRP 6.5.5/II SRP 6.5.5/III/2	Acceptable methods for computing fission product retention by the suppression pool are given in subsection III, "REVIEW PROCEDURES." Pool Bypass Fraction: The fraction of drywell atmosphere bypassing the suppression pool by leaking through the drywell penetrations is obtained as a product of the review under SRP Section 6.2.1.1.C. If B is the bypass fraction and DF is the time-integrated pool decontamination factor, then the overall decontamination, D, to be used for accident dose calculations, may be taken as: $D = DF/[1 + B(DF-1)]$. The reviewer should clearly distinguish that fraction of B, which may be further treated by the standby gas treatment system from that fraction of B which also bypasses the secondary containment building.	A decontamination factor (DF) of 10 is being applied to this analysis based on the above guidance for a Mark II containment. It should be noted that the basis for comparison to 10 for SSES is appropriate for the minimum suppression pool level of 22 feet based on the results of NEDO-25420, where GE performed a generic evaluation of suppression pool scrubbing for BWR's. However, this DF is being corrected for containment leakage that bypasses the suppression pool using the equation and guidance provided in the in SRP Section 6.5.5. This determination is documented in calculation EC-LOCA-1003, Rev. 0, which determined a decontamination factor of 7.96. The components making up the bypass fraction used in the correction are comprised of SCBL, primary to secondary containment leakage (i.e., L_a), and suppression pool steam bypass leakage. While SCBL makes up a component of the bypass fraction, it is only subject to passing un-scrubbed gas during the initial minutes of the event. The long term leakage would be at the scrubbed conditions which occur after the non-condensables are blown down to the suppression pool and return to the drywell.
7	SRP 6.5.5/ III/3	System Design: The information on the design of the suppression pool is reviewed to familiarize the reviewer with the expected temperature histories, depth of fission product entry expected during postulated accidents, and potential leakage paths through drywell penetrations.	No conformance evaluation necessary.
8	SRP 6.5.5/ III/4	Testing and Technical Specifications: The details of the applicants proposed preoperational tests and, at the operating license stage, the surveillance requirements are reviewed to ensure that the pool depth and amount of leakage bypassing the pool are maintained consistent with the assumptions used in assessing the pool's effectiveness in fission product cleanup.	See item #6 above and Tech Spec 3/4.6.1.2.

Table A: Evaluation of SSES Conformance to SRP 6.5.5

9	SRP 6.5.5/II SRP 6.2.1.1.C/II	While granting credit for suppression pool scrubbing in the calculations of accident doses, the acceptance criteria of containment leakage in SRP 6.2.1.1.C and the acceptance criteria of the engineered safety feature atmosphere cleanup systems in SRP 6.5.1 should still be met. The acceptance criteria given below applies to...containment. CSB accepts the containment design if the relevant requirements of GDC 4, 16, 50 and 53 are met. Specific Criterion #1: In meeting the requirements of GDC 16 and 50...the peak calculated values of pressure and temperature for the drywell and wetwell should not exceed the respective design values. Also the peak deck differential pressure for Mark II plants should not exceed the design values.	FSAR Sections 3.1.2.1.4, 3.1.2.2.7, 3.1.2.5.1, and 3.1.2.5.4 demonstrates PP&L's compliance with GDC's 4, 16, 50, and 53, respectively, regarding containment leakage. Additionally, FSAR section 6.2.1 provides assurance that the specific criterion in SRP 6.2.1.1.C associated with negative pressure across the drywell floor are satisfied.
10	SRP 6.2.1.1.C/II	Specific Criterion #2: "...calculation of dynamic loads should be based on appropriate analytical models and supported by applicable test data...."	The acceptance criteria in SRP Section 6.2.1.1.C, Revision 6, related to containment leakage are associated primarily with conformance to GDC's 16, 50, and 53 as delineated throughout SRP Section 6.2.1.1.C, as well as, the suppression pool bypass leakage discussed in acceptance criteria 5 above. The specific acceptance criteria considered are #2, #4, #6, and #7. FSAR Sections 3.1.2.2.7, 3.1.2.5.1, and 3.1.2.5.4 demonstrate PP&L's compliance with GDC's 16, 50, and 53 respectively regarding containment leakage. Additionally, FSAR section 6.2.1 provides assurance that the specific criterion in SRP 6.2.1.1.C associated with negative pressure across the drywell floor are satisfied.
11	SRP 6.2.1.1.C/II	Specific Criterion #3: Not applicable to Mark II.	Not applicable to Mark II containments.

Table A: Evaluation of SSES Conformance to SRP 6.5.5

12	SRP 6.2.1.1.C/II	Specific Criterion #4: "...the maximum allowable leakage area for steam bypass of the suppression pool should be greater than the technical specification limit for leakage measured in the periodic drywell-wetwell leakage tests...."	See item #3 above.
13	SRP 6.2.1.1.C/II	Specific Criterion #5: Not applicable to Mark II.	Not applicable to Mark II containments.
14	SRP 6.2.1.1.C/II	Specific Criterion #6: "...following ways to protect the drywell and wetwell...and the operating deck of Mark II plants...(a) structures should be designed to withstand the maximum pressure, and (b) vacuum relief devices should be provided....	See item #9 above.
15	SRP 6.2.1.1.C/II	Specific Criterion #7: "...the external design pressures for the structures, including the design upward deck differential pressure for Mark II plants should provide an adequate margin above the maximum calculated external pressures to account for uncertainties in the analyses."	See item #9 above.
16	SRP 6.2.1.1.C/II	Specific Criterion #8: The acceptability of the reactor coolant system safety/relief valve in-plant confirmatory test program shall be based on conformance with the guidelines specified in Section 6, 7, and 8 of NUREG-0763.	Not applicable to containment leakage.
17	SRP 6.2.1.1.C/II	Specific Criterion #9: "...the local suppression pool temperature should not exceed 200F or the acceptance criteria specified in NUREG-0783."	Not applicable to containment leakage.

Table A: Evaluation of SSES Conformance to SRP 6.5.5

18	SRP 6.2.1.1.C/II	Specific Criterion #10: "...instrumentation capable of operating in the post-accident environment should be provided to monitor the containment atmosphere pressure and temperature and the suppression pool water level and temperature following an accident. The instrumentation should have adequate range, accuracy and response...Items II.F. 1 of NUREG-073 and NUREG-0718 and Regulatory Guide 1.97...should be followed."	Not applicable to containment leakage.
19	SRP 6.5.1/II	ETSB acceptance criteria for ESF atmosphere cleanup systems are based on meeting the relevant requirements of GDC 19, 41, 42, 43, 61 and 64.	SSES conformance with these general design criteria are established in FSAR Sections 3.1.2.2.10, 3.1.2.4.12, 3.1.2.4.13, 3.1.2.4.14, 3.1.2.6.2, and 3.1.2.6.5.
20	SRP 6.5.1/II	Specific Criterion: The ESF atmosphere cleanup systems should be designed so that they can operate after a design basis accident and can retain radioactive material after a DBA. The system should have provisions to prefilter air, remove moisture and meet the Regulatory Guide 1.52 requirements for charcoal adsorption. The systems should be redundant, be designed to start automatically, and be limited to an air flow rate of approximately 30,000 cfm.	Standby Gas Treatment System (SGTS) is designed to operate after a DBA and retain radioactive material prior to release to the atmosphere. SGTS is designed to include moisture separators, prefilters, electric heating coils, upstream HEPA filters, 8" deep charcoal filter, downstream HEPA filters and meets the intent of Regulatory Guide 1.52, Rev. 1, July 1976. FSAR section 3.13.1, and Table 6.5-2 includes item by item details of design conformance to this Regulatory Guide. SGTS is designed to be redundant, actuates automatically, meets Seismic category I design requirements and has a design airflow rate of 10,500 cfm. SGTS design details are included in FSAR Section 6.5.1.1. Control Structure Emergency Outside Air Supply System (CSEOASS) is designed to operate after a DBA and filter radioactive material and airborne contaminants from outside air prior to supply into the control room. CSEOASS is designed to include prefilters, electric heating coils, upstream HEPA filters, 4" deep charcoal filters, downstream HEPA filters and meets the design intent of Regulatory Guide 1.52, Rev. 1, July 1976. FSAR section 3.13.1, and table 6.5-2 includes item by item details of design conformance to this regulatory guide. CSEOASS is designed to be redundant, actuates automatically, meets Seismic category I design requirements and has a design airflow rate of 6,000 cfm. CSEOASS design details are included in FSAR Section 6.5.1.2.

Table A: Evaluation of SSES Conformance to SRP 6.5.5

21	SRP 6.5.1/II	Specific Criterion: Design of instrumentation for ESF atmosphere cleanup systems should conform to the guidelines of Regulatory Guide 1.52 and to the recommendations of ANSI N509. Minimum instrumentation, readout, recording and alarm provisions for ESF atmosphere cleanup systems are given in Table 6.5.1-1 of this SRP section.	Design of instrumentation for SGTS and CSEOASS meets the intent of the guidelines of Regulatory Guide 1.52, Rev. 1. FSAR section 3.13.1, and Table 6.5-2 include item-by-item details of design conformance to this Regulatory Guide. FSAR sections 6.5.1.1 and 6.5.1.2 provide the design details of these systems. The SSES provided instrumentation, readout, recording, alarm provisions and controls for SGTS and CSEOASS, do not fully meet the minimum requirements identified in table 6.5.1-1 of SRP 6.5.1, Rev. 2. However, the instrumentation and controls currently installed is adequate to perform the design function of these systems. Where the minimum requirements are not met, the instrument is either not applicable to the SSES design, or it is not germane to the ability of these systems to perform their safety function.
22	SRP 6.5.1/II	Specific Criterion: Environmental design guidelines for acceptability are based on the conditions following a DBA. Radiation source terms should be consistent with the guidelines in Regulatory Guides 1.3, 1.4, 1.7 and 1.25.	SSES conformance to the guidelines of Regulatory Guides 1.3, 1.4, 1.7, and 1.25 is discussed in FSAR section 3.13.1.
23	SRP 6.5.1/II	Specific Criterion: Components such as demisters, heaters, prefilters, HEPA filters, mounting frames, filter housings, adsorbent, fans, ductwork and dampers should be designed, constructed and tested in accordance with ANSI 509-1980 design and qualification testing criteria. Water drain design and the accessibility of components and ease of maintenance should be in accordance without he recommendations of ERDA 76-21 and ANSI 509.	SGTS Filtration Trains were procured under Bechtel Specification M321, SGTS fans were procured under Bechtel Specification M362, dampers were procured under Bechtel Specification M336A and ductwork was procured and installed under Bechtel Specification M323C. Equipment was manufactured and installed per industry standards current at the time of issue of the purchase orders for these equipment. Regulatory guide 1.52. Rev. 0 was specified on M321. IOM 135 from the CVI Corporation, includes the manufacturing and factory testing details for the SGTS filter trains. Equipment design details and requirements identified in these specifications were reviewed against the requirements identified in ANSI N509-1980 as specified in various positions shown in Regulatory Guide 1.52, Rev.2. From the review, PP&L can conclude that although the SSES SGTS design does not conform to all of the specific requirements of ANSI N509-1980, it is fully capable of performing its intended safety function. Therefore, SSES SGTS design meets the intent of this criterion. CSEOASS Filtration Trains were procured under Bechtel Specification M325, CSEOASS fans were procured under Bechtel Specification M307, dampers were procured under Bechtel Specification M336A and

Table A: Evaluation of SSES Conformance to SRP 6.5.5

			ductwork was procured and installed under Bechtel Specification M323C. Equipment was manufactured and installed per industry standards current at the time of issue of the purchase orders for these equipment. Regulatory Guide 1.52. Rev. 0 was specified on M325. IOM 182 from the FARR Company includes the manufacturing and factory testing details for the CSEOASS filter trains. Equipment design details and requirements identified in these specifications were reviewed against the requirements identified in ANSI N509-1980 as specified in various positions shown in Regulatory guide 1.52, Rev.2. From the review, PP&L can conclude that although the SSES CSEOASS design does not conform to all of the specific requirements of ANSI N509-1980, it is fully capable of performing its intended safety function. Therefore, SSES CSEOASS design meets the intent of this criterion.
24	SRP 6.5.1/II	Specific Criterion: Acceptability with respect to the in-place testing should include meeting the requirements of ANSI N510-1980. For laboratory testing of activated carbon adsorbent, conformance with the ANSI N509-1980 will be used as an acceptability criterion.	Tech. Spec. 3/4.6.5.3 identify that SGTS in-place testing be performed to meet the requirement of Regulatory Guide 1.52, rev.2 positions c.5.a, c.5.c, c.5.d c.6.a and c.6.b, and that the heater performance meet the requirements of ANSI N510-1975. These RG positions specify various sections of ANSI N510-1975 and ANSI N509-1976. SSES surveillance test procedures SE-070-A09/B09 and SE-070-A10/B10 meet these requirements. PP&L has reviewed applicable sections of ANSI N510-1980 and has concluded that there are differences between these two standards. However, PP&L concludes that the current SSES SGTS testing is adequate to ensure the integrity and operability of SGTS. Tech. Spec. 3/4.7.2 identifies that SGTS in-place testing be performed to meet the requirement of RG 1.52, rev.2 positions c.5.a, c.5.c, c.5.d c.6.a and c.6.b, and that the heater meet the requirements of ANSI N510-1975. These RG positions specify various sections of ANSI N510-1975 and ANSI N509-1976. SSES surveillance test procedures SE-030-A09/B09 and SE-030-A10/B10 meet these requirements. PP&L has reviewed applicable sections of ANSI N510-1980 and conclude that there are differences between these two standards. However, PP&L concludes that the current SSES CSEOASS surveillance test procedures are adequate to ensure the integrity and operability of SGTS. At SSES, the laboratory testing of activated carbon adsorbent is performed in conformance with ASTM D3803(1979) which is identified in Table 5-1 of ANSI N509-1980. Per above discussion, PP&L concludes that we meet the intent of this criterion.