

ATTACHMENT 2 TO AEP:NRG:0959B

PROPOSED REVISED TECHNICAL SPECIFICATION PAGES

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PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4. Verifying within 31 days after removal that a laboratory analysis of a carbon sample from either at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers demonstrates a removal efficiency of greater than or equal to 90% for radioactive methyl iodide when the sample is tested in accordance with ANSI N510-1980 (ASTM D 3803-1979, 30°C, 95% R.H.). The carbon samples not obtained from test canisters shall be prepared by either:

- a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or
- b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 25,000 cfm plus or minus 10%.

5. Verifying a system flow rate of 25,000 cfm plus or minus 10% during system operation when tested in accordance with ANSI N510-1980.

c. After every 720 hours of charcoal adsorber operation by either:

1. Verifying within 31 days after removal that a laboratory analysis of a carbon sample obtained from a test canister demonstrates a removal efficiency of greater than or equal to 90% for radioactive methyl iodide when the sample is tested in accordance with ANSI N510-1980 (ASTM D 3803-1979, 30°C, 95% R.H.); or
2. Verifying within 31 days after removal that laboratory analyses of at least two carbon samples demonstrate a removal efficiency of greater than or equal to 90% for radioactive methyl iodide when the samples are tested in accordance with ANSI N510-1980 (ASTM D 3803-1979, 30°C, 95% R.H.) and the samples are prepared by either:
 - a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or

REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS (Continued)

3. 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 N510-1980 while operating the exhaust ventilation system at a flow rate of 30,000 cfm plus or minus 10%.
4. Verifying within 31 days after removal that a laboratory analysis of a carbon sample from either at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers demonstrates a removal efficiency of greater than or equal to 90% for radioactive methyl iodide when the sample is tested in accordance with ANSI N510-1980 (ASTM D 3803-1979, 30°C, 95% R.H.). The carbon samples not obtained from test canisters shall be prepared by either:
 - (a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or
 - (b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 30,000 cfm plus or minus 10%.

5. Verifying a system flow rate of 30,000 cfm plus or minus 10% during system operation when tested in accordance with ANSI N510-1980.
- c. After every 720 hours of charcoal adsorber operation by either:
1. Verifying within 31 days after removal that a laboratory analysis of a carbon sample obtained from a test canister demonstrates a removal efficiency of greater than or equal to 90% for radioactive methyl iodide when the sample is tested in accordance with ANSI N510-1980 (ASTM D 3803-1979, 30°C, 95% R.H.); or

REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS (Continued)

2. Verifying within 31 days after removal that laboratory analyses of at least two carbon samples demonstrate a removal efficiency of greater than or equal to 90% for radioactive methyl iodide when the samples are tested in accordance with ANSI N510-1980 (ASTM D 3803-1979, 30°C, 95% R.H.) and the samples are prepared by either:
 - a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or
 - b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 30,000 cfm plus or minus 10%.

- d. At least once per 18 months by:
 1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than or equal to 6 inches Water Gauge while operating the exhaust ventilation system at a flow rate of 30,000 cfm plus or minus 10%.
 2. Deleted.
 3. Verifying that on a high-radiation signal, the system automatically directs its exhaust flow through the charcoal adsorber banks and automatically shuts down the storage pool ventilation system supply fans.
 4. Verifying that the exhaust ventilation system maintains the spent fuel storage pool area at a negative pressure of greater than or equal to 1/8 inches Water Gauge relative to the outside atmosphere during system operation.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4. Verifying within 31 days after removal that a laboratory analysis of a carbon sample from either at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers demonstrates a removal efficiency of greater than or equal to 90% for radioactive methyl iodide when the sample is tested in accordance with ANSI N510-1980 (ASTM D 3803-1979, 30°C, 95% R.H.). The carbon samples not obtained from test canisters shall be prepared by either:
- a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or
 - b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 25,000 cfm plus or minus 10%.

5. Verifying a system flow rate of 25,000 cfm plus or minus 10% during system operation when tested in accordance with ANSI N510-1980.
- c. After every 720 hours of charcoal adsorber operation by either:
- 1. Verifying within 31 days after removal that a laboratory analysis of a carbon sample obtained from a test canister demonstrates a removal efficiency of greater than or equal to 90% for radioactive methyl iodide when the sample is tested in accordance with ANSI N510-1980 (ASTM D 3803-1979, 30°C, 95% R.H.); or
 - 2. Verifying within 31 days after removal that laboratory analyses of at least two carbon samples demonstrate a removal efficiency of greater than or equal to 90% for radioactive methyl iodide when the samples are tested in accordance with ANSI N510-1980 (ASTM D 3803-1979, 30°C, 95% R.H.) and the samples are prepared by either:
 - a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or

REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS (Continued)

3. 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 N510-1980 while operating the exhaust ventilation system at a flow rate of 30,000 cfm plus or minus 10%.
4. Verifying within 31 days after removal that a laboratory analysis of a carbon sample from either at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers demonstrates a removal efficiency of greater than or equal to 90% for radioactive methyl iodide when the sample is tested in accordance with ANSI N510-1980 (ASTM D 3803-1979, 30°C, 95% R.H.). The carbon samples not obtained from test canisters shall be prepared by either:
 - (a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or
 - (b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 30,000 cfm plus or minus 10%.

5. Verifying a system flow rate of 30,000 cfm plus or minus 10% during system operation when tested in accordance with ANSI N510-1980.
- c. After every 720 hours of charcoal adsorber operation by either:
1. Verifying within 31 days after removal that a laboratory analysis of a carbon sample obtained from a test canister demonstrates a removal efficiency of greater than or equal to 90% for radioactive methyl iodide when the sample is tested in accordance with ANSI N510-1980 (ASTM D 3803-1979, 30°C, 95% R.H.)

REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS (Continued)

2. Verifying within 31 days after removal that laboratory analyses of at least two carbon samples demonstrate a removal efficiency of greater than or equal to 90% for radioactive methyl iodide when the samples are tested in accordance with ANSI N510-1980 (ASTM D 3803-1979, 30°C, 95% R.H.) and the samples are prepared by either:
 - (a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or
 - (b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 30,000 cfm plus or minus 10%.

- d. At least once per 18 months by:
 1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than or equal to 6 inches Water Gauge while operating the exhaust ventilation system at a flow rate of 30,000 cfm plus or minus 10%.
 2. Deleted.
 3. Verifying that on a high-radiation signal, the system automatically directs its exhaust flow through the charcoal adsorber banks and automatically shuts down the storage pool ventilation system supply fans.
 4. Verifying that the exhaust ventilation system maintains the spent fuel storage pool area at a negative pressure of greater than or equal to 1/8 inches Water Gauge relative to the outside atmosphere during system operation.



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