Technical Specification Change Request No. 58 (Appendix A)

Replace pages 3/4 3-23, 3/4 3-24, 3/4 3-25, and 3/4 7-21 with the attached revised pages 3/4 3-23, 3/4 3-24, 3/4 3-25, and 3/4 7-21.

Proposed Change

This change will move the surveillance requirement for testing the high radiation initiation of the control room emergency ventilation system from Specification 3/4.7.7.1 to Specification 3/4.3.3.1.

Reason for Proposed Change

Specification 4.7.7.1.e.2 presently requires the control room emergency ventilation system to automatically switch into a recirculation mode of operation with either an ESFAS test signal or a high radiation test signal. In order to comply with the high radiation portion of this specification, RM-A5 must be operable. There is no redundancy built into RM-A5. Therefore, each time RM-A5 fails both ventilation systems should technically be declared inoperable, since we cannot meet the surveillance requirements which demonstrate system operability. This will envoke the requirements of Specification 3.0.3 which dictates a one-hour shutdown.

This surveillance requirement is poorly structured to fit the requirements of system operability. Failure of the systems' ability to automatically shift to recirculation upon a high radiation test signal does not compromise the system operability, especially if the system is manually placed in the recirculation mode when the automatic function is deactivated. The system will still circulate, filter, and cool the air in the control room.

What we are really addressing in this specification is the function of a process radiation monitor. Therefore, the surveillance requirements of RM-A5 would be more appropriately located under Specification 3.3.3.1, Radiation Monitoring Instrumentation. By this action, the interlock functions of RM-A5 will be properly addressed and tested, and the appropriate action taken upon a failure. These changes are consistent with the Babcock and Wilcox Standard Technical Specifications, Rev. 3, July 1979 (page 3/4 3-26, 3-27, and 7-16) as well.

Safety Analysis of Proposed Change

There are no additional safety concerns involved with these changes. The control complex emergency ventilation system will be adequately tested so that it will perform its intended function. Additionally, the operability of RM-A5 will be tested such that it will provide the interlock function to the control complex ventilation system when required. Therefore, both systems will function as designed and no unreviewed safety question is involved.

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TABLE 3.3-6

RADIATION MONITORING INSTRUMENTATION

	INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ALARM/TRIP SETPOINT	MEASUREMENT RANGE	ACTION
1.	AREA MONITORS					
	a. Fuel Storage Pool Area					
	i. Criticality Monitor	1	*	$\leq$15 mr/hr	10^{-1} - 10^{4} mr/hr	14
2.	PROCESS MONITORS					
	a. Fuel Storage Pool Area					
	i. Gaseous Activity - Ventilation System Isolation	1	**	$\leq$2 x background	10^{1} - 10^{6} cpm	16
	b. Reactor Building					
	i. Gaseous Activity -					
	a) Purge Exhaust Duct Isolation	1	6	***	10^{1} - 10^{5} cpm	17
	b) RCS Leakage Detection	1	1, 2, 3 & 4	Not Applicable	10^{1} - 10^{6} cpm	15
	ii. Iodine Activity - RCS Leakage Detection	1	1, 2, 3 & 4	Not Applicable	10^{1} - 10^{6} cpm	15
	c. Control Room					
	i. Iodine Activity - Ventilation System Isolation/ Recirculation	1	All Modes	$\leq$2 x background	10^{1} - 10^{6} cpm	18

*With fuel in the storage pool or building
**With irradiated fuel in the storage pool
***Determined by requirements of Appendix "B", Tech. Specs., Section 2.4.2 - Crystal River 3 Operating License No. DPR-72.

TABLE 3.3-6 (Continued)

TABLE NOTATION

ACTION 14 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, perform area surveys of the monitored area with portable monitoring instrumentation at least once per 24 hours.

ACTION 15 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the action requirements of Specification 3.4.6.1.

ACTION 16 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.9.12.

ACTION 17 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.9.9.

ACTION 18 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, within 1 hour initiate and maintain operation of the control room emergency ventilation system in the recirculation mode of operation.

TABLE 4.3-3

RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
1. AREA MONITORS				
a. Fuel Storage Pool Area				*
i. Criticality Monitor	S	R	M	
2. PROCESS MONITORS				
a. Fuel Storage Pool Area				
i. Gaseous Activity - Ventilation System Isolation	S	R	M	**
b. Reactor Building				
i. Gaseous Activity -				
a) Purge Exhaust Duct Isolation	S	Q	M	6
b) RCS Leakage Detection	S	R	M	1, 2, 3, α 4
ii. Iodine Activity - RCS Leakage Detection	S	R	M	1, 2, 3, α 4
c. Control Room				
i. Iodine Activity - Ventilation System Isolation/ Recirculation	S	R	M	All Modes

*With fuel in the storage pool or building
**With irradiated fuel in the storage pool

SURVEILLANCE REQUIREMENTS (Continued)

1. Verifying that, with the system operating at a flow rate of 43,500 cfm ±10%, and exhausting through the HEPA filters and charcoal adsorbers, the total bypass flow of the system to the facility vent, including leakage through the system diverting valves, is ≤1% when the system is tested by admitting cold DOP at the system intake.

2. Verifying that the ventilation system satisfies the in-place testing acceptance criteria, and uses the test procedures of Regulatory Positions C.5.a, C.5.c*, and C.5.d* of Regulatory Guide 1.52, Revision 1, July 1976, and the system flow rate is 43,500 cfm ±10%.

3. Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample, obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 1, July 1976, meets the laboratory testing criteria of Regulatory Position C.6.1 of Regulatory Guide 1.52, Revision 1, July 1976.

4. Verifying a system flow rate of 43,500 cfm ±10% during system operation, when tested in accordance with ANSI N10-1975.

d. After every 720 hours of charcoal absorber operation, by verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample, obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 1, July 1976, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 1, July 1976.

e. At least once per 18 months, by:

1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is <6 inches Water Gauge while operating the system at a flow rate of 43,500 cfm ±10%.

2. Verifying that on a containment isolation test signal, the system automatically switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks.