

Three Mile Island Nuclear Station, Unit II
Operating License No. DPR-73
Docket No. 50-320

Recovery Operations Plan Change Request No. 2

The licensee requests that pages 4.9-1 and 4.9-2 of the Recovery Operations Plan for TMI-II be replaced. The replacement pages are attached to this submittal.

Reason for Change

After the March 28, 1979, incident at Three Mile Island, the plant ventilation stack, used to provide an effluent pathway for Auxiliary Building and Fuel Handling Building ventilation exhaust flow streams, was fitted with an end cap to render it inoperable. Supplementary ventilation units, consisting of additional fans and filters, were added to the ventilation system to: (1) increase system flow rates, and (2) provide additional filtering of the flow stream prior to discharge.

Because of the addition of the supplementary ventilation system to the existing building ventilation system, increased system flow rates were achieved.

Upon return of the ventilation system to its normal operational configuration, the supplementary fans will no longer be available for the achievement of higher than design ventilation flow rates. The design flow rates for each of the building ventilation systems are:

Auxiliary Building	65,000 cfm
Fuel Handling Building	36,000 cfm

These flow rate values are reported in Sections 9.4.2.2 and 9.4.3.2 of the TMI-II Final Safety Analysis Report and are sufficient for the performance of proper ventilation system operation to accomplish the objectives of:

- (1) building heat removal,
- (2) maintenance of the building at a negative pressure, relative to the atmosphere, and
- (3) atmospheric radiological control.

Although supplementary ventilation units have been added to the ventilation flow stream, it is not prudent to require that this flow stream operate at a higher flow rate than the original system design. Therefore, the proposed Recovery Operations Plan change request is based on the original ventilation system design flow rates for the accomplishment of the above-listed objectives.

Safety Evaluation Justifying Change

No safety evaluation is required for the justification of this change. This proposed change requires the verification of system operation in accordance with its design.

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Amendment Class

The proposed change is a change to the TMI-II Recovery Operations Plan. Since these changes do not require payment of a fee for processing the change, no payment is enclosed.

SURVEILLANCE REQUIREMENTS

4.9 LIQUID RADIOACTIVE WASTE STORAGE

FUEL HANDLING BUILDING/AUXILIARY BUILDING AIR CLEANUP SYSTEMS

4.9.12 The fuel handling building air cleanup system and the auxiliary building air cleanup system shall be demonstrated OPERABLE:

- a. At least once per 31 days by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that each filter train operates for at least 15 minutes.
- b. Initially and at least once per 18 months of (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:
 1. Verifying a flow rate of 23,000 cfm \pm 10% for each fuel handling building exhaust filter train when tested in accordance with ANSI N510-1975.
 2. Verifying a flow rate of 36,000 cfm \pm 10% for each auxiliary building exhaust filter train when tested in accordance with ANSI N510-1975.
- c. At least once per 18 months by:
 1. Verifying an exhaust flow rate of at least 36,000 cfm for the fuel handling building air cleanup system with two fuel handling building supply fans and two fuel handling building exhaust fans in operation.
 2. Verifying an exhaust flow rate of at least 65,000 cfm for the auxiliary building air cleanup system with two auxiliary building supply fans and two auxiliary building exhaust fans in operation.
 3. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks of each fuel handling building filter train is less than 6 inches Water Gauge while it operates at a flow rate of 23,000 cfm \pm 10%.
 4. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks of each auxiliary building filter train is less than 6 inches Water Gauge while it operates at a flow rate of 36,000 cfm \pm 10%.

SURVEILLANCE REQUIREMENTS

5. Verifying that the fuel handling building air cleanup system maintains the fuel handling building at a negative pressure of greater than or equal to 1/8 inch Water Gauge relative to the outside atmosphere during system operation.
 6. Verifying that the auxiliary building air cleanup system maintains the auxiliary building at a negative pressure of greater than or equal to 1/8 inch Water Gauge relative to the outside atmosphere during system operation.
 7. Verifying that each fuel handling building filter train satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a and C.5.c of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 23,000 cfm \pm 10%.
 8. Verifying that each auxiliary building filter train satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a and C.5.c of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 36,000 cfm \pm 10%.
- d. After each complete or partial replacement of a HEPA filter bank in a fuel handling building filter train by verifying that the HEPA filter banks in this filter train remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the filter train at a flow rate of 23,000 cfm \pm 10%.
 - e. After each complete or partial replacement of a HEPA filter bank in an auxiliary building filter train by verifying that the HEPA filter banks in this filter train remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the filter train at a flow rate of 36,000 cfm \pm 10%.