

Omaha Public Power District
1623 Harney Omaha, Nebraska 68102-2247
402/536-4000

October 4, 1989
LIC-89-911

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, DC 20555

- References:
1. Docket No. 50-285
 2. Letter OPPD (K. J. Morris) to NRC (Document Control Desk) dated September 8, 1989 (LIC-89-850)
 3. Letter OPPD (K. J. Morris) to NRC (Document Control Desk) dated August 28, 1989 (LIC-89-770)

Gentlemen:

SUBJECT: Request for Enforcement Discretion relative to the Control Room HVAC System

Reference 2 provided additional information concerning OPPD's request for Enforcement Discretion relative to the Control Room HVAC System. In a telephone conversation on September 25, 1989, with Mr. Paul Bemis and other members of my staff, Mr. Tony Bournia of the NRC Staff requested further information on this matter.

Per Mr. Bournia's request the following information is provided on the 9 in. water allowable pressure drop.

From the information supplied by the filter manufacturer, Flanders Filters, the following pressure drops were obtained:

| | <u>dP Clean</u> ("water) | <u>dP Dirty</u> ("water) |
|---------------|--------------------------|--------------------------|
| Prefilter | .62" | 1.24" |
| HEPA Filter | .82" | 1.64" |
| Carbon Filter | 1.25" | N/A |

With the filter arrangement of 1 prefilter, 2 HEPA filter banks, and 2 carbon filter trays per unit, the following total pressure drops are obtained:

Clean: $.62 + (2 \times .82) + (2 \times 1.25) = 4.76$ in. water
Dirty: $1.24 + (1.64 \times 2) + (1.25 \times 2) = 7.02$ in. water

In addition to this, pressure drops for the air straightener, heater and velocity losses must be added.

8910160252 891004
FDR ADOCK 05000285
P PDC

Good
11/11

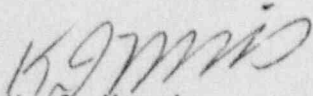
The manufacturer sized the motor blowers to provide rated flow at 9 in. water filter pressure drop plus 1 in. w.g. external pressure drop. This allows for added operational flexibility as the HEPA filters can be loaded in excess of the recommended changeout dP without decreasing removal efficiency. The 9 in. water pressure drop included in SAO-89-002 is thus derived from a combination of recommended values from the filter manufacturer, motor-blower capability, and operational experience.

We hope this information resolves any questions concerning the allowable filter pressure drop included in SAO-89-002.

During the telephone call on September 25, 1989, Mr. Bemis agreed to provide three drawings at the request of the NRC Staff. These drawings are attached. Also, this letter confirms the statement made by Mr. Bemis concerning the applicability of the present Technical Specifications to the new HVAC System: Until the NRC's approval of FLC-89-002, OPPD will test the new filters as follows: 1. OPPD will commission the new filters using modification (MR-FC-87-20) test procedures to demonstrate initial operability; 2. Subsequent testing will be performed utilizing revised surveillance procedures. All testing procedures and acceptance criteria will meet the requirements of the existing Technical Specifications.

If you have further questions or comments, please contact us.

Sincerely,


K. J. Morris
Division Manager
Nuclear Operations

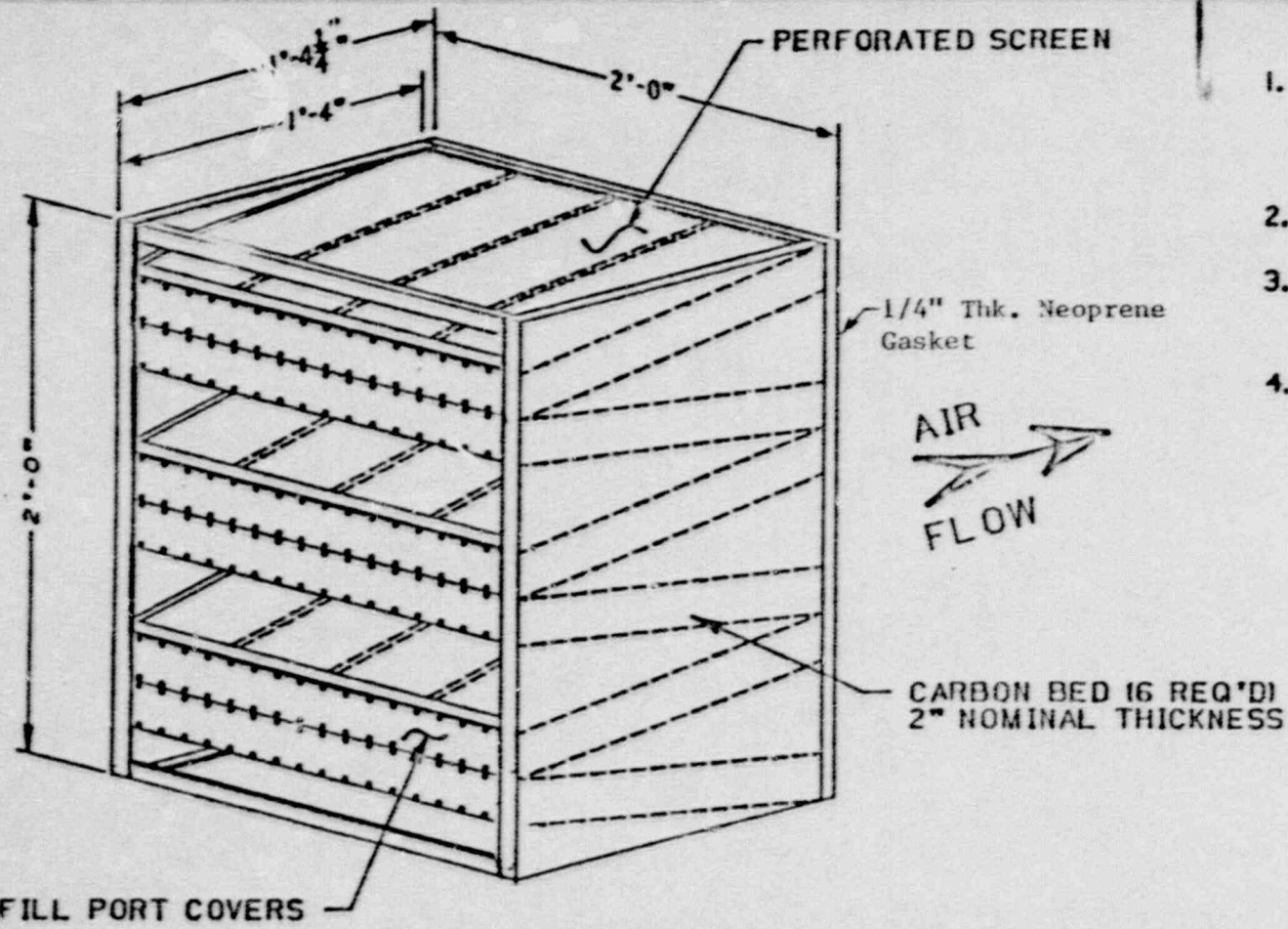
Attachments: 1. Drawing, information only, CRHVAC
2. Drawing, information only, 2V-N63-G16, Size: GG16
3. Drawing, information only, Seismic E-6 (304) L Type I
Filter Train

KJM/pjc

c: LeBoeuf, Lamb, Leiby, and MacRae
R. D. Martin, NRC Regional Administrator
A. Bournia, NRC Project Manager
P. H. Harrell, NRC Senior Resident Inspector

SPECIFICATIONS

1. MATERIAL: FRAME - 14 GA. T-304 S/S
 SCREENS - 26 GA T-304 S/S
 Z-BARS - 18 GA. T-304 S/S
 POP RIVET - T-305 S/S
2. CONSTRUCTION: WELDED AND POP RIVETED
3. CARBON: CAMERON CARBON INC.
 NUCLEAR GRADE CARBON
 TYPE CY-4069, 8 X 16 MESH
4. FACTORY TEST: UNITS ARE TO BE TESTED WITH FREON TO ENSURE A MINIMUM OF 99.9% MECHANICAL EFFICIENCY.



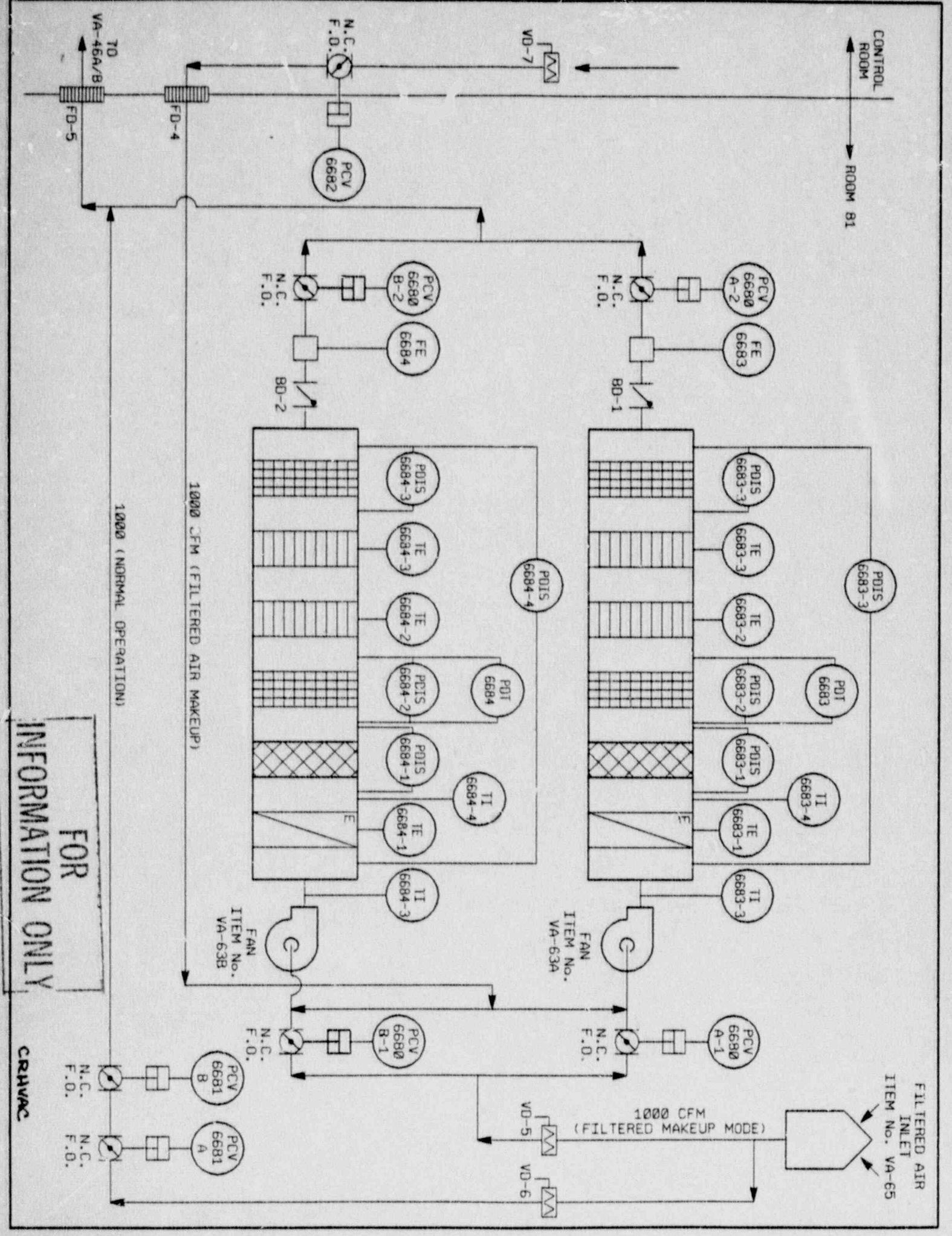
| PART NUMBER | | RATED FLOW |
|------------------|--------|----------------------|
| T-2V-N63-G16 | | 1000 CFM |
| RESIDENCE TIME | | VELOCITY THROUGH BED |
| .125 SEC. | | 85 FPM |
| WEIGHT IN POUNDS | | PRESSURE DROP |
| TARE | FILLED | |
| 100 | 180 | 1.25" W.G. |

FOR
INFORMATION ONLY

| | | |
|---|---------------------|------------------------------|
| CUSTOMER <u>Omaha Public Power District</u> <u>Ft. Calhoun Station</u> | | |
| CUSTOMER ORDER NO. <u>5042512</u> | | |
| FLANDERS ORDER NO. <u>C890504</u> | | |
| DR: <u>R. Harris</u> | DATE <u>6/12/89</u> | SCALE <u>1/8" =</u> |
| CHK: <u>[Signature]</u> | | TOL. <u>±0.01/16"</u> |
| APPR: <u>[Signature]</u> | | |
| TITLE: <u>2V-N63-G16, SIZE: GG-16</u> | | |
| FLANDERS FILTERS, INC. RABINSON, D.C. | | DRAWING NO. <u>CA-1289-1</u> |

| REV. | DESCRIPTION | DATE | APPR. |
|------|-------------|------|-------|
| | | | |

CONTROL ROOM ROOM 81



FOR INFORMATION ONLY

CRHVAC

PLEASE NOTE:

DRAWING 3 WHICH IS A FULL SIZE DRAWING IS NOT
INCLUDED IN THIS COPY.