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September 2, 1982  
NRC/TMI-82-051

Docket No. 50-320

Hr. B.K. Kanga  
Director, TMI-2  
GPU Nuclear Corporation  
P.O. Box 480  
Middletown, PA 17057

Dear Sir:

Subject: Recovery Operations Plan Change Request No. 17

Reference: Letter from B.K. Kanga to L.H. Barrett, same subject, dated August 16, 1982

We have reviewed the referenced letter which transmits your Recovery Operations Plan (ROP) Change Request No. 17. This change incorporates operability requirements on the two (2) AMS-3 EPICOR II prefilter monitors used to measure particulate airborne levels in both the blockhouse and HEPA filtering system effluents. These operability requirements have been prepared to assure that potential airborne pathways are being monitored during all evolutions of EPICOR II prefilter purging and inerting.

Based on the proposed AMS-3 operability tests (i.e., channel check, calibration and functional test), and the frequency of these tests, the NRC staff agrees that sufficient monitoring checks exist to ensure the proper operation of these two airborne particulate monitors. In order to make the effluent AMS-3 monitor consistent with other plant effluent particulate monitors, the staff has incorporated a lower limit of detectability (LLD) requirement in the Surveillance Requirement section of the ROP (see attached page 4.3-1). With these above changes, the staff has determined that acceptable controls exist to both ensure the health and safety of the public and to alert operations

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personnel of any potential airborne radioactive particulate levels within the blockhouse and storage cell during liner inerting and handling operations. We are approving the above mentioned changes and are enclosing the amended sections to the Recovery Operations Plan as approved Change No. 16.

Lake H. Barrett  
Deputy Program Director  
TMI Program Office

Attachment: As stated

cc: J.J. Barton  
L.P. King  
J.E. Larson  
J.W. Thiesing  
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## SURVEILLANCE REQUIREMENTS

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### 4.3 INSTRUMENTATION

#### 4.3.1 NEUTRON MONITORING INSTRUMENTATION

4.3.1.1 Each neutron monitoring instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations during RECOVERY MODE and at the frequency shown in Table 4.3-1.

#### 4.3.2 ENGINEERING SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

4.3.2.1 Each ESFAS instrumentation channel shall be demonstrated OPERABLE (per occupational exposure considerations) by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations during RECOVERY MODE and at the frequencies shown in Table 4.3-2.

#### 4.3.3 MONITORING INSTRUMENTATION

##### RADIATION MONITORING INSTRUMENTATION

4.3.3.1 Each fuel storage pool area radiation monitoring instrumentation channel shall be demonstrated OPERABLE (per occupational exposure considerations) by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-3 and by verifying the alarm/trip setpoints are adjusted in accordance with procedures approved pursuant to Technical Specification 6.8.2 for the gaseous activity monitor, radioactive iodine monitor and particulate activity monitor.

4.3.3.2 Each AMS-3 particulate monitor used for the EPICOR II Prefilter purging and inerting operation shall be demonstrated operable by the performance of the channel checks, calibrations, and functional tests at the frequencies shown in Table 4.3-3 and by verifying alarm/trip setpoints are adjusted in accordance with procedures approved pursuant to Technical Specification 6.8.2.

Particulate air samples collected by the effluent monitor shall be analyzed for gamma emitting isotopes. Upon detection of any gamma emitter, the sample shall be analyzed for Sr-90 contents. The analytical methods used shall provide for LLD of at least  $1 \times 10^{-12}$  uCi/cc for both gamma emitters and Sr-90.

##### SEISMIC INSTRUMENTATION

4.3.3.3.1 Each of the accessible (per occupational exposure considerations) seismic monitoring instruments shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-4.

4.3.3.3.2 Each of the accessible (per occupational exposure considerations) seismic monitoring instruments actuated during a seismic event shall be restored to OPERABLE status within 24 hours and a CHANNEL CALIBRATION performed within 5 days following the seismic event. Data shall be retrieved from actuated instruments and analyzed to determine the magnitude of the vibratory ground motion. A Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 10 days describing the magnitude, frequency spectrum and resultant effect upon facility features important to safety.

TABLE 4.3-3RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL FUNCTIONAL TEST</u>
1. PROCESS MONITORS			
a. Fuel Storage Pool Area			
i. Gaseous Activity	S	R	M
ii. Particulate Activity	S	R	M
iii. Radioactive Iodine	S	R	M
2. EPICOR II Purge Monitors (AMS-3)	D	SA	W