3.7 LIMITING CONDITIONS FOR OPERATION	4.7 SURVEILLANCE REQUIREMENTS
Treatment System and an alternate electrical power source, consisting of the associated Emergency Diesel Generator or Vernon tie, for each standby gas treatment circuit shall be operable at all times when secondary containment integrity is required.	
2. a. The results of the in-place cold DOP and halogenated hydrocarbon tests at design flows on HEPA and charcoal filter banks shall show ≥99% DOP removal and ≥99% halogenated hydrocarbon removal.	2. a. The tests and sample analysis of Specification 3.7.B.2 shall be performed initially and at least once per operating cycle not to exceed 18 months, and following painting, fire or chemical release in any ventilation zone communicating with the system, while the system is operating, that could contaminate the HEPA filters or charcoal adsorbers.
	b. Cold DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank.
b. The results of laboratory carbon sample analysis shall show ≥95% radioactive methyl iodide removal. (130°C, 95% RH). Laboratory analysis results shall be verified acceptable within 31 days following sample removal or the applicable train of the Standby Gas Treatment System shall be considered in-operable and the requirements of Specification 3.7.B.3 shall apply.	c. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of the charcoal filter bank. In addition, the sample analysis of Specification 3.7.B.2.b and the halogenated hydrocarbon test shall be performed after every 720 hours of normal system operation.
c. System fans shall be shown to operate within ±10% of design flow.	d. Each circuit shall be operated with the heaters on at least 10 hours every month.
	e. An ultrasonic leak test shall be performed on the gaskets sealing the housing panels downstream of the HEPA filters and adsorbers at least

BASES: 3.7 (Cont'd)

The Standby Gas Treatment System (SGTS) is designed to filter and exhaust the Reactor Building atmosphere to the stack during secondary containment isolation conditions, with a minimum release of radioactive materials from the Reactor Building to the environs. To insure that the standby gas treatment system will be effective in removing radioactive contaminates from the Reactor Building air, the system is tested periodically to meet the intent of ANSI N510-1975. Both standby gas treatment fans are designed to automatically start upon containment isolation and to maintain the Reactor Building pressure to approximately a negative 0.15 inch water gauge pressure; all leakage should be in-leakage. Should the fan fail to start, the redundant alternate fan and filter system is designed to start automatically. Each of the two fans has 100% capacity. This substantiates the availability of the operable circuit and results in no added risk; thus, reactor operation or refueling operation can continue. If neither circuit is operable, the plant is brought to a condition where the system is not required.

When the reactor is in cold shutdown or refueling the drywell may be open and the Reactor Building becomes the only containment system. During cold shutdown the probability and consequences of a DBA LOCA are substantially reduced due to the pressure and temperature limitations in this mode. However, for other situations under which significant radioactive release can be postulated, such as during operations with a potential for draining the reactor vessel, during core alterations, or during movement of irradiated fuel in the secondary containment, operability of standby gas treatment is required. An alternate electrical power source for the purposes of Specification 3.7.B.1.b shall consist of either an Emergency Diesel Generator (EDG) or the Vernon Hydro tie line. Maintaining availability of the Vernon Hydro tie line as an alternative to one of the EDGs in this condition provides assurance that standby gas treatment can, if required, be operated without placing undue constraints on EDG maintenance availability. Inoperability of both circuits of the SGTS or both EDGs during refueling operations requires suspension of activities that represent a potential for releasing radioactive material to the secondary containment, thus placing the plant in a condition that minimizes risk.

Use of the SGTS, without the fan and the 9 kW heater in operation, as a vent path during torus venting does not impact subsequent adsorber capability because of the very low flows and because humidity control is maintained by the standby 1 kW heaters, therefore operation in this manner does not accrue as operating time.

D. Primary Containment Isolation Valves

Double isolation valves are provided on lines that penetrate the primary containment and communicate directly with the reactor vessel and on lines that penetrate the primary containment and communicate with the primary containment free space. Closure of one of the valves in each line would be sufficient to maintain the integrity of the pressure suppression system. Automatic initiation is required to minimize the potential leakage paths from the containment in the event of a loss-of-coolant accident.

4.7 STATION CONTAINMENT SYSTEMS

A. Primary Containment System

The water in the suppression chamber is used only for cooling in the event of an accident, i.e., it is not used for normal operation; therefore, a weekly check of the temperature and volume is adequate to assure that adequate heat removal capability is present.