

Specification 50

PEAPS Unit 2

5.7
6.13High Radiation Area

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas.

6.13.1 In lieu of the control devices or alarm signal controls required by paragraph 20.1601(c) of 10 CFR 20:
(20.1601(c) and (b))

5.7.1

- a. Each High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by issuance of a Radiation Work Permit. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:
- b.
- c.
- d.

Such areas may be breached during periods of entry and exit

or equivalent that includes specification of radiation dose rates in the immediate work areas and other appropriate radiation protection equipment and measures

- d.1. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

- d.2. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.

- d.4(a). A direct-reading dosimeter and, be under surveillance, as specified in the RWP or equivalent will be in the area, of an individual, qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over activities within the area and shall perform periodic radiation surveillance at the frequency specified by the plant health physicist or his designee on the Radiation Work Permit.

at the work site

- d.4(b). Controlling personnel radiation exposure in the area.

but less than 500 mrem/hr

5.7.2

- a. Each High Radiation Area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of 6.13.1 (a) above. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Manager, the Shift Supervisor or the Senior Design Engineer.

gate or guard

- a.1. radiation protection personnel

Amendment No. 25, 47, 55 132 -161-
June 22, 1988

- a.2. Doors and gates shall remain locked or guarded except during periods of personnel entry or exit

Insert

C

Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are following plant radiation protection procedures for entry to, exit from, and work in such areas.

Insert

d.3

A radiation monitoring device that continuously transmits dose rate or cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or

Insert

d.4(b)

Be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area.

Specification 5.0

Response to NRC Comparison Question 2

L6

Insert

5.7.2

5.7.1

a.

~~Each High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by issuance of a Radiation Work Permit. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:~~

Such areas may be located during periods of activity.

5.7.2

b.

Insert 5.7.1C

5.7.2

d.

~~A radiation monitoring device which continuously indicates the radiation dose rate in the area~~

or equivalent that includes specification of radiation dose rates in the immediate work areas and other appropriate radiation protection equipment and measures.

5.7.2

d.1.

A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.

5.7.2

e.

~~An individual, qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over activities within the area and shall perform periodic radiation surveillance at the frequency specified by the plant health physicist or his designee on the Radiation Work Permit.~~

A direct-reading dosimeter and, be under surveillance, as specified in the RWP or equivalent with the same, of

Insert 5.7.2 d.2

5.7.2

d.4(a)

3

controlling personnel radiation exposure in the area.

Insert

5.7.2 d.4(b)

Specification 5.0 Response to NRC Comparison Question 2

Insert
5.7.2c

Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are following plant radiation protection procedures for entry to, exit from, and work in such areas.

Insert₂
5.7.2d.8

A radiation monitoring device that continuously transmits dose rate or cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or

with a means to
communicate with and
control every individual
in the area


Insert₃
5.7.2.d.9(b)

Be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area,

and with the
means to communicate
with and control every
individual in the area

DISCUSSION OF CHANGES
ITS 5.0: ADMINISTRATIVE CONTROLS

TECHNICAL CHANGES - MORE RESTRICTIVE (continued)

- M₅ This change proposes to add the requirement that procedures be established, implemented, and maintained for all programs identified in Specification 5.5 "Programs and Manuals." The addition of the requirement that procedures be established, implemented, and maintained for the programs of Section 5.5 is consistent with the requirement for these programs. The addition of requirements in the TS constitutes a more restrictive change. This change is consistent with NUREG-1433.
- M₆ The SGT System filter delta P limit has been decreased from 8 inches water gauge to 3.9 inches water gauge. This ensures that at the maximum allowed filter train flow rate (10500 cfm allowed per SR 3.6.4.1.4), the filter train delta P will be limited such that filter train integrity is not compromised. Since the limit has been decreased, this constitutes a more restrictive change. 
- M₇ This change proposes to add a requirement for an RCS Pressure and Temperature Limits Report. This report will contain RCS pressure and temperature limits, including heatup and cooldown rates, criticality, and hydrostatic and leak test limits. The addition of reports to the TS, constitute a more restrictive change. This change is consistent with NUREG-1433.
- M₈ This change proposes to add a requirement in the TS for the Safety Function Determination Program. This program is included to support implementation of the support system Operability characteristics of the improved Technical Specifications. The addition of new requirements to the TS constitutes a more restrictive change.
- M₉ This change proposes to add a requirement in the TS for Technical Specifications Bases Control Program. This program is provided to specifically delineate the appropriate methods and reviews necessary for a change to the Bases of Technical Specifications.
- M₁₀ This change proposes to add a requirement in TS for a Component Cyclic or Transient Limit Program. This program provides controls to track the cyclic and transient occurrences to ensure that components are maintained within the design limits. The addition of programs to the TS, constitutes a more restrictive change. This change is consistent with NUREG-1433.

5.5.7 Ventilation Filter Test PGAPS Program

5.0 Response to NRC Comparison Question 4

LIMITING CONDITIONS FOR OPERATION

SURVEILLANCE REQUIREMENTS

3.7.8 Standby Gas Treatment System

4.7.8 Standby Gas Treatment System

1. Except as specified in 3.7.8.3 below, both filter trains of the Standby Gas Treatment System and at least two system fans shall be operable at all times when secondary containment integrity is required. Only one of the two Standby Gas Treatment System (SGTS) trains shall be used at a time for primary containment purge/vent operations using the large isolation valves. Both SGTS trains shall be operable as required by Specification 3.7.E.

At least once per operating cycle, the following conditions shall be demonstrated.

Pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 8 inches of water at approximately 8,000 CFM.

Inlet heater is capable of providing at least 40 KW.

2.a. The test and sample analysis of specification 3.7.B.2 shall be performed initially and at least once per year for standby service; or after every 720 hours of filter train operation; or following significant painting, fire or chemical release in any ventilation zone communicating with the system when it is in operation.

b. Cold DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing.

c. Halogenated hydrocarbon refrigerant testing shall be performed after each complete or partial replacement of the charcoal adsorber bank or after any structural maintenance of the system housing.

d. Testing of gasket seals for housing doors downstream of the HEPA filters and charcoal adsorbers shall be performed in conjunction with each test performed for compliance with Specification 4.7.B.2.a.

2a. The results in the in-place Cold DOP and halogenated hydrocarbon tests at approximately 800 CFM on HEPA filters and charcoal adsorber banks shall show $\geq 99\%$ DOP removal and $\geq 99\%$ halogenated hydrocarbon removal or that filter train shall not be considered operable.

b. The results of Laboratory carbon sample analysis shall show $\geq 95\%$ radioactive methyl iodide removal at a velocity within 20% of system design, 0.5 to 1.5 mg/m³ inlet methyl iodine concentration, $\geq 70\%$ relative humidity and ≥ 190 degrees F or that filter train shall be considered inoperable.

c. If gas flow capability or 8,000 CFM \pm 800 CFM can not be provided to a filter train by the fans, that filter train shall not be considered operable.

See Discussion of Change 173 364, Standby Gas Treatment System

7200 to 8800

5.5.7.4, c

5.5.7

5.5.7

5.5.7

5.5.7.a & 5.5.7.b

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