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Bases Continued:

B. Standby Gas Treatment System, and C. Secondary Containment

Insert A  
from next  
page

Initiating reactor building isolation and operation of the standby gas treatment system to maintain the design negative pressure within the secondary containment provides an adequate test of the reactor building isolation valves and the standby gas treatment system. Periodic testing gives sufficient confidence of reactor building integrity and standby gas treatment system operational capability.

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The frequency of tests and sample analysis are necessary to show that the HEPA filters and charcoal adsorbers can perform as evaluated. Standby gas treatment system in place testing 1989 procedures will be established utilizing applicable sections of ANSI N510-1975 standard as a procedural guideline only. ~~Redundant heaters in the standby gas treatment system rooms prevent moisture buildup on the adsorbent.~~ If painting, fire, or chemical release occurs such that the HEPA filter or charcoal adsorber could become contaminated from the fumes, chemicals, or foreign materials, the same tests and sample analysis should be performed as required for operational use. Replacement adsorbent should be qualified according to the guidelines of Regulatory Guide 1.52 Revision 2<sup>x</sup> (June 1976). The charcoal adsorber efficiency test procedures will allow for the removal of one representative sample cartridge. The sample will be at least two inches in diameter and a length equal to the thickness of the bed. If the iodine removal efficiency test results are unacceptable, all adsorbent in the system will be replaced. High efficiency particulate filters are installed before and after the charcoal filters to prevent clogging of the carbon adsorbers and to minimize potential release of particulates to the environment. An efficiency of 99% is adequate to retain particulates that may be released to the reactor building following an accident. This will be demonstrated by in place testing with DOP as the testing medium. Any HEPA filters found defective will be replaced with filters qualified pursuant to regulatory guide position C.3.d of Regulatory Guide 1.52 Revision 2<sup>x</sup> (June 1976). Once per operating cycle demonstration of HEPA filter pressure drop, operability of <sup>inlet</sup> heaters at rated power, automatic initiation of each standby gas treatment system circuit, and leakage tests after maintenance or testing which could affect leakage, is necessary to assure system performance capability.

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The 30°C, 95% relative humidity test per ASTM D 3803-89 is the test method to establish the methyl iodine removal efficiency of the adsorbent.

**Insert Text A for Monticello Technical Specification Bases Page 188**

Secondary Containment Capability Test data obtained under non-calm conditions is to be extrapolated to calm wind conditions using information provided in "Summary Technical Report to the United States Atomic Energy Commission, Directorate of Licensing, on Secondary Containment Leak Rate Test", submitted by letter dated July 23, 1973, and as described in NSP letter to the NRC dated August 18, 1995, with subject, "Revision 2 to License Amendment Request Dated June 8, 1994, "Standby Gas Treatment and Secondary Containment Technical Specifications."

Exhibit C

Monticello Nuclear Generating Plant

Revision 2 to License Amendment Request Dated June 8, 1994

Revised Technical Specification Pages

Exhibit C consists of the Technical Specification pages with the proposed changes incorporated. Existing pages affected by this change are listed below:

Page

188

Bases Continued:

B. Standby Gas Treatment System, and C. Secondary Containmentment

Initiating reactor building isolation and operation of the standby gas treatment system to maintain the design negative pressure within the secondary containment provides an adequate test of the reactor building isolation valves and the standby gas treatment system. Periodic testing gives sufficient confidence of reactor building integrity and standby gas treatment system operational capability. Secondary Containmentment Capability Test data obtained under non-calm conditions is to be extrapolated to calm wind conditions using information provided in "Summary Technical Report to the United States Atomic Energy Commission, Directorate of Licensing, on Secondary Containmentment Leak Rate Test", submitted by letter dated July 23, 1973, and as described in NSP letter to the NRC dated August 18, 1995, with subject, "Revision 2 to License Amendment Request Dated June 8, 1994, Standby Gas Treatment and Secondary Containmentment Technical Specifications."

The frequency of tests and sample analysis are necessary to show that the HEPA filters and charcoal adsorbers can perform as evaluated. Standby gas treatment system inplace testing procedures will be established utilizing applicable sections of ANSI N510-1989 standard as a procedural guideline only. If painting, fire, or chemical release occurs such that the HEPA filter or charcoal adsorber could become contaminated from the fumes, chemicals, or foreign materials, the same tests and sample analysis should be performed as required for operational use. Replacement adsorbent should be qualified according to the guidelines of Regulatory Guide 1.52 Revision 2 (March 1978). The charcoal adsorber efficiency test procedures will allow for the removal of a representative sample. The 30°C, 95% relative humidity test per ASTM D 3803-89 is the test method to establish the mythel iodine removal efficiency of the adsorbent. The sample will be at least two inches in diameter and a length equal to the thickness of the bed. If the iodine removal efficiency test results are unacceptable, all adsorbent in the system will be replaced. High efficiency particulate filters are installed before and after the charcoal filters to prevent clogging of the carbon adsorbers and to minimize potential release of particulates to the environment. An efficiency of 99% is adequate to retain particulates that may be released to the reactor building following an accident. This will be demonstrated by inplace testing with DOP as the testing medium. Any HEPA filters found defective will be replaced with filters qualified pursuant to regulatory guide position C.3.d of Regulatory Guide 1.52 Revision 2 (March 1978). Once per operating cycle demonstration of HEPA filter pressure drop, operability of inline heaters at rated power, automatic initiation of each standby gas treatment system circuit, and leakage tests after maintenance or testing which could affect leakage, is necessary to assure system performance capability.