

ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

DOCKET NOS. 50-277
50-278

LICENSE NOS. DPR-44
DPR-56

TECHNICAL SPECIFICATIONS CHANGE REQUEST

95-13

"ADMINISTRATIVE CHANGE TO VENTILATION
FILTER TESTING PROGRAM"

SUPPORTING INFORMATION FOR CHANGES - 3 PAGES

PECO Energy Company requests that the Technical Specifications (TS) for the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3 be amended as proposed below to provide for the changing of the Ventilation Filter Testing Program (VFTP).

Provided below is a discussion and description of the proposed changes, a safety assessment, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

The marked-up pages indicating the proposed changes are provided in Attachment 2.

We request that, if approved, the changes be effective by January 11, 1996.

Discussion and Description of the Proposed Changes

Revise Improved Technical Specifications (ITS) Sections 5.5.7.a and 5.5.7.b to correct an administrative error in the VFTP.

During the development of the PBAPS ITS submittal, the requirements in existing TS Section 3/4.7.B, "Standby Gas Treatment System," and Section 3/4.11.A, "Main Control Room Emergency Ventilation System," regarding testing of high efficiency particulate absolute (HEPA) filters and charcoal adsorber banks were incorporated into ITS Section 5.5.7, "VFTP".

PECO Energy submitted TS Change Request 93-16 to adopt ITS. Included in this submittal were comparison documents which marked up the existing TS to indicate where the requirements were proposed to be located in ITS. The comparison documents indicated that existing requirements in TS Section 3.7.B.2a and 3.11.A.4.a were relocated to ITS Section 5.5.7.a and 5.5.7.b. An administrative change to existing TS Section 3.7.B.2a and 3.11.A.4.a was proposed and identified as administrative change number 11. The discussion of changes for administrative change number 11 states, "Requirements in existing Specifications 3/4.7.B, Standby Gas Treatment System, and 4.11.A, Main Control Room Emergency Ventilation System, regarding testing of HEPA filters and charcoal adsorber banks were incorporated into Section 5.5.7, Ventilation Filter Testing Program. The Ventilation Filter Testing Program specifies testing requirements equivalent to the existing specifications; however, references to the appropriate sections of Regulatory Guide 1.52 and ASME N510-1989 were added for clarity." This change was discussed in the No Significant Hazards Consideration for ITS along with all other administrative changes for ITS Chapter 5.0, "Administrative Controls."

The NRC approved the VFTP as proposed in Amendments 210 and 214. The NRC Safety Evaluation Report (SER) dated August 30, 1995, stated, "Requirements in CTS 3/4.7.B, Standby Gas Treatment System, and 4.11.A, Main Control Room Emergency Ventilation System regarding testing of HEPA filters and charcoal adsorber banks are incorporated into ITS 5.5.7, Ventilation Filter Testing Program. The Ventilation Filter Testing Program specifies testing requirements equivalent to the CTS; however, references to the appropriate sections for Regulatory Guide 1.52 and ASME N510-1989 were added for clarity. This change is administrative, is consistent with the STS, and is acceptable."

An administrative error occurred during the reformatting and relocation of existing TS Sections 3.7.B.2a and 3.11.A.4.a to ITS Sections 5.5.7.a and 5.5.7.b. Existing TS require the in-place cold dictyl phthalate (DOP) and halogenated hydrocarbon tests on HEPA filters and charcoal adsorber banks to show $\geq 99\%$ DOP removal and $\geq 99\%$ halogenated hydrocarbon removal or to consider that filter train inoperable. TS Change Request 93-16 comparison documents, No Significant Hazards Consideration, and proposed VFTP restated the requirements for an in-place test of the HEPA filters and the charcoal adsorber to show a penetration and system bypass of less than 0.05% when tested in accordance with Regulatory Guide 1.52 and ASME N510-1989. The 0.05% value for penetration and system bypass was in error. The correct value for penetration and system bypass is less than 1.0%.

Safety Assessment

The proposed changes do not involve any physical changes to plant systems, structures, or components (SSC), or the addition of new SSC. The proposed changes are purely administrative in nature to make ITS requirements consistent with the current PBAPS licensing basis and have no impact on any safety analysis assumptions.

Information Supporting a Finding of No Significant Hazards Consideration

The changes proposed in the Application do not constitute a Significant Hazards Consideration in that:

- i) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because the changes are purely administrative and do not involve any physical changes to plant SSC. These proposed changes do not impact initiators of analyzed events, and will not increase the probability of occurrence of an accident previously evaluated. These proposed changes do not impact the assumed mitigation of accidents or transient events. Therefore, these changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.
- ii) The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because the changes will not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The changes do not allow plant operation in any mode that is not already evaluated in the safety analysis. Therefore, these changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.
- iii) The proposed changes do not involve a significant reduction in a margin of safety because they are purely administrative and will not involve any technical changes. Generic Letter 83-13 (GL 83-13), "Clarification of Surveillance Requirements for HEPA Filters and Charcoal Adsorber Units in Standard Technical Specifications on ESF Cleanup Systems," was reviewed for guidance. GL 83-13 based in-place penetration and bypass leakage testing acceptance criteria in part on the NRC staff assumptions used in its safety evaluation reports (SERs) for the ESF atmospheric cleanup systems. GL 83-13 stated, "0.05% value applicable when a HEPA filter or charcoal adsorber efficiency of

99% is assumed, or 1% when a HEPA filter or charcoal adsorber efficiency of 95% or less is assumed in the NRC staff's safety evaluation." In the original SER for PBAPS dated August 11, 1972, the NRC staff assumed a 90% halogen removal efficiency for the elemental and particulate forms of iodine, and 70% for the organic forms of iodine in the HEPA filters and charcoal adsorbers of the Standby Gas Treatment System (SGTS). The SER for Amendments 10/7 dated June 25, 1975 was issued to resolve an issue raised by a December 10, 1974, letter from the NRC proposing model TS for PBAPS Control Room Air Treatment Systems and SGTS. The June 25, 1975, SER documented the acceptability of values of less than 1% penetration and bypass leakage which is still in place in the existing TS Bases. No S.I.Rs assumed HEPA filter or charcoal adsorber efficiency of 99%. Therefore, GL 83-13 recommends acceptance of less than 1% penetration and bypass leakage. Therefore, maintaining the current requirements for penetration and bypass leakage does not involve a reduction in the margin of safety. Also, because the change is administrative in nature, no question of safety is involved. Therefore, the change does not involve a significant reduction in a margin of safety.

Information Supporting an Environmental Assessment

An environmental assessment is not required for the changes proposed by this Application because the changes conform to the criteria for "actions eligible for categorical exclusion," as specified in 10CFR51.22(c)(10). The proposed changes relate to changes in recordkeeping, reporting, or administrative procedures or requirements.

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed the proposed changes and have concluded that the changes do not involve an unreviewed safety question and will not endanger the public health and safety.

ATTACHMENT 2

PEACH BOTTCM ATOMIC POWER STATION

UNITS 2 AND 3

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

TECHNICAL SPECIFICATIONS CHANGE REQUEST
95-13

List of Attached Pages

Unit 2

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Unit 3

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5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

- 1) Once per 12 months for standby service or after 720 hours of system operation; and,
- 2) After each complete or partial replacement of the HEPA filter train or charcoal adsorber filter; after any structural maintenance on the system housing; and, following significant painting, fire, or chemical release in any ventilation zone communicating with the system while it is in operation.

Tests described in Specifications 5.5.7.d and 5.5.7.e shall be performed once per 24 months.

The test described in Specification 5.5.7.f shall be performed once per 12 months.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

- a. Demonstrate for each of the ESF systems that an in-place test of the HEPA filters shows a penetration and system bypass $< 1.0\%$ ~~$< 0.05\%$~~ when tested in accordance with Regulatory Guide 1.52, Revision 2, Section 5c, and ASME N510-1989, Sections 6 (Standby Gas Treatment (SGT) System only) and 10, at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u>Flowrate (cfm)</u>
SGT System	7200 to 8800
Main Control Room Emergency Ventilation (MCREV) System	2700 to 3300

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

- b. Demonstrate for each of the ESF systems that an in-place test of the charcoal adsorber shows a penetration and system bypass $< 0.05\%$ when tested in accordance with Regulatory Guide 1.52, Revision 2, Section 5d, and ASME N510-1989, Sections 6 (SGT System only) and 11, at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u>Flowrate (cfm)</u>
SGT System	7200 to 8800
MCREV System	2700 to 3300

- c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, Section 6b, shows the methyl iodide penetration less than the value specified below when tested at the conditions specified below.

	<u>ESF Ventilation System</u>	
	<u>SGT System</u>	<u>MCREV System</u>
Methyl iodide removal rate: (%)	≥ 95	≥ 90
Methyl iodide concentration: (mg/m^3)	0.5 to 1.5	0.05 to 0.15
Flow rate: (% design flow)	80 to 120	80 to 120
Temperature: (degrees F)	≥ 190	≥ 125
Relative Humidity: (%)	≥ 70	≥ 95

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

- 1) Once per 12 months for standby service or after 720 hours of system operation; and,
- 2) After each complete or partial replacement of the HEPA filter train or charcoal adsorber filter; after any structural maintenance on the system housing; and, following significant painting, fire, or chemical release in any ventilation zone communicating with the system while it is in operation.

Tests described in Specifications 5.5.7.d and 5.5.7.e shall be performed once per 24 months.

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<u>ESF Ventilation System</u>	<u>Flowrate (cfm)</u>
SGT System	7200 to 8800
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(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

- b. Demonstrate for each of the ESF systems that an in-place test of the charcoal adsorber shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, Section 5d, and ASME N510-1989, Sections 6 (SGT System only) and 11, at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u>Flowrate (cfm)</u>
SGT System	7200 to 8800
MCREV System	2700 to 3300

- c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, Section 6b, shows the methyl iodide penetration less than the value specified below when tested at the conditions specified below.

	<u>ESF Ventilation System</u>	
	<u>SGT System</u>	<u>MCREV System</u>
Methyl iodide removal rate: (%)	≥ 95	≥ 90
Methyl iodide concentration: (mg/m ³)	0.5 to 1.5	0.05 to 0.15
Flow rate: (% design flow)	80 to 120	80 to 120
Temperature: (degrees F)	≥ 190	≥ 125
Relative Humidity: (%)	≥ 70	≥ 95

(continued)