REFUELING OPERATIONS

FUEL HANDLING AREA VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.9.11 The fuel handling area ventilation system shall be operating and discharging through the HEPA filters and charcoal absorbers.

<u>APPLICABILITY:</u> Whenever irradiated fuel is being moved in the storage pool and during crane operation with loads over the storage pool.

ACTION:

- a. With the fuel handling area ventilation system not operating, suspend all operations involving movement of fuel within the spent fuel pool or crane operation with loads over the spent fuel pool until the fuel handling area ventilation system is restored to operation.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.11.1 The fuel handling area ventilation system shall be determined to be in operation and discharging through the HEPA filters and charcoal absorbers at least once per 12 hours.

4.9.11.2 The fuel handling area ventilation system shall be demonstrated OPERABLE at the following frequencies when irradiated fuel is in the storage pool:

- At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:
 - Verifying that the ventilation system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 30,000 cfm ± 10%.

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REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS (Continued)

- Verifying within 31 days after removal that laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
- Verifying a system flow rate of 30,000 cfm ± 10% during system operation when tested in accordance with ANSI N510-1975.
- b. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
- c. At least once per 18 months by verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is < 6 inches Water Gauge while operating the system at a flow rate of 30,000 cfm ± 10%.
- d. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove > 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 30,000 cfm ± 10%.
- e. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal absorbers remove \geq 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 30,000 cfm \pm 10%.

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