

A T T A C H M E N T A

Revise our previous submittal as follows:

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PLANT SYSTEMS

3/4.7.7 CONTROL ROOM EMERGENCY HABITABILITY SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.7.1 The control room emergency habitability system is OPERABLE, when:

- a. The emergency ventilation system is OPERABLE, and
- b. The bottled air pressurization system is OPERABLE, and
- c. The Unit 2 control room area, emergency and normal, ventilation system dampers which isolate the control room from the outside atmosphere are OPERABLE or closed.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With the emergency ventilation system or the bottled air pressurization system inoperable, restore both systems to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the Unit 2 control room area, emergency or normal, ventilation system dampers which isolate the control room from the outside atmosphere inoperable, close the inoperable ventilation system dampers within 1 hour.

SURVEILLANCE REQUIREMENTS

4.7.7.1 The emergency ventilation system shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the control room air temperature is $\leq 104^{\circ}\text{F}$.
- b. At least once per 31 days by:
 1. Initiating flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for 15 minutes.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- d. At least once per 18 months by:
1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is < 6 inches Water Gauge while operating the ventilation system at a flow rate of 800 cfm \pm 10%.
 2. Verifying that on a containment isolation signal, the system automatically starts within 60 minutes and diverts its inlet flow through the HEPA filters and charcoal adsorber banks.
 3. Verifying that the system maintains the control room at a positive pressure of $> 1/8$ inch W. G. relative to the outside atmosphere during system operation.

4.7.7.2 The bottled air pressurization system shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that the system contains a minimum of 10 bottles of air each pressurized to at least 1825 psig and by verifying that the system solenoid operated valves are powered from an operable emergency bus.
- b. At least once per 18 months by verifying that the system will supply at least 800 cfm of air to maintain the control room at a positive pressure of $\geq 1/8$ inch W. G. relative to the outside atmosphere during system operation.

4.7.7.3 Verify at least once per 31 days that the Unit 2, emergency and normal, ventilation system dampers which isolate the control room from the outside atmosphere are OPERABLE or closed.

REFUELING OPERATIONS

3/4.9.15 CONTROL ROOM EMERGENCY HABITABILITY SYSTEMS

LIMITING CONDITION FOR OPERATION

3.9.15.1 The control room emergency habitability system is OPERABLE when:

- a. The emergency ventilation system is OPERABLE, and
- b. The bottled air pressurization system is OPERABLE, and
- c. The Unit 2 control room area, emergency and normal, ventilation system dampers which isolate the control room from the outside atmosphere are OPERABLE or closed.

APPLICABILITY: During movement of irradiated fuel.

Apply the applicable action of specification 3.7.7.1.

SURVEILLANCE REQUIREMENTS

4.9.15.1 The emergency ventilation system shall be demonstrated OPERABLE in accordance with Specification 4.7.7.1.

4.9.15.2 The bottled air pressurization system shall be demonstrated OPERABLE in accordance with Specification 4.7.7.2.

4.9.15.3 The Unit 2 control room area, emergency and normal, ventilation system dampers which isolate the control room from the outside atmosphere shall be verified OPERABLE or closed in accordance with Specification 4.7.7.3.

REFUELING OPERATIONS

BASES

3/4.9.15 CONTROL ROOM EMERGENCY HABITABILITY SYSTEMS

The OPERABILITY of the control room ventilation system ensures that 1) the ambient air temperature does not exceed the allowable temperature for continuous duty rating for the equipment and instrumentation cooled by this system and 2) the control room will remain habitable for operations personnel during and following all credible accident conditions. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criteria 19 of Appendix "A", 10 CFR 50.

A T T A C H M E N T B

Proposed Technical Specification Change No. 126, Revision 1
No Significant Hazard Consideration

Description of amendment request: The Control Room Emergency Bottled Air Pressurization System (CREBAPS) and Control Room Emergency Ventilation System (CREVS) will be modified to upgrade both systems to accommodate the additional volume of the Unit 2 control room. A wall currently separates the Unit 1 and Unit 2 control rooms and serves as a ventilation, fire protection and security barrier. The wall will be removed to provide a common control room area for the two units.

The CREBAPS compressed air storage capacity will be increased by adding five new compressed air storage tanks which are equivalent in capacity and pressure to the existing tanks. The combined capacity of the compressed air storage tanks will then be sufficient to maintain the common control room area pressurized for the required one-hour time period. A larger air compressor has also been installed to provide additional charging capability for the system.

The Control Room Emergency Ventilation System Supply Fans VS-F-41A and VS-F-41B will be replaced with larger fans capable of supplying the additional flow rate required to maintain the common control room area pressurized. In addition, larger supply and discharge ducting, a larger duct heater and larger dampers will be installed to satisfy the additional flow requirements. Operating more than one fan at a time may pressurize the control room area so that it may be difficult to open and close control room doors. Therefore, operating procedures will be revised so that only one fan will be operated at any one time.

The following changes have been incorporated:

1. Page 3/4 7-16, Section 3.7.7.1 has been revised to require the Unit 2 emergency and normal ventilation system dampers which isolate the control room from the outside atmosphere to be operable or closed. This will ensure no flowpath is open to the outside atmosphere so that the control room can be pressurized during plant operation. Action statement "a" has been incorporated to address inoperability of either the emergency ventilation system or the bottled air pressurization system. If both systems are inoperable, then plant shutdown would be required in accordance with Specification 3.0.3. Action statement "b" has been incorporated to address closing the inoperable Unit 2 control room area emergency or normal ventilation dampers which isolate the control room from the outside atmosphere.
2. Page 3/4 7-18, surveillance requirement 4.7.7.3 has been incorporated to verify that the Unit 2 emergency and normal ventilation system dampers which isolate the control room from the outside atmosphere are operable or closed.

3. Page 3/4 9-16, Section 3.9.15.1 has been incorporated to address control room emergency habitability requirements during movement of irradiated fuel. This specification will be applicable during movement of irradiated fuel to comply with the fuel handling accident analysis performed for Unit 2. The proposed specification will ensure the operators are protected by limiting radiation exposure in the event of a fuel handling accident. The action required is identical to that applicable to specification 3.7.7.1. The surveillance requirements reference those of specification 3.7.7.1 since the same systems are required to be operable.
4. Page B 3/4 9-4, Bases Section 3/4.9.15 Control Room Emergency Habitability Systems has been added to reflect the bases applicable to specification 3.7.7.1.

Basis for no significant hazards determination: The proposed changes do not involve a significant hazards consideration because plant operation in accordance with these changes would not:

1. Involve a significant increase in the probability of occurrence or the consequences of a previously evaluated accident because: The proposed changes provide additional limitations on the Unit 2 CREVS to ensure the control room area environmental conditions are maintained to protect the plant operators under postulated accident conditions.

Specification 3.9.15.1 was incorporated into the refueling section of the technical specifications to ensure the required limitations would be incorporated into the plant refueling procedures. These changes are consistent with removal of the control room wall and upgrade of the CREBAPS and CREVS required to handle the additional volume of the Unit 2 control room area. Therefore, these changes will not affect the probability of occurrence or the consequences of previously evaluated accidents.

2. Create the possibility of a new or different kind of accident from any previously analyzed because: The proposed changes will ensure control room environmental conditions are maintained suitable for operator habitability during accident conditions. The wall removal requires the additional capacity of the CREBAPS and CREVS to handle the additional volume of the Unit 2 control room area. The requirements of specification 3.7.7.1 provide limitations on the Unit 2 as well as the Unit 1 CREVS during Modes 1-4 and specification 3.9.15.1 provides the limitations applicable during movement of irradiated fuel. Therefore, the possibility for a new or different kind of accident will not be created.
3. Involve a significant reduction in a margin of safety because: The Technical Specifications provide limitations on control room habitability during Modes 1-4 and when moving irradiated fuel. Unit 2 will have similar requirements so that each unit will be protected during the required modes of operation. Therefore, the margin of safety will not be reduced.

Conclusion

The proposed changes are consistent with the removal of the control room wall and upgrade of the CREBAPS and CREVS required to handle the additional volume of the Unit 2 control room area. Technical Specifications provide the limitations required to ensure the control room area environmental conditions are maintained to protect the plant operators during postulated accident conditions. Since the Unit 2 control room area may be a potential path to the outside atmosphere during accident conditions, limitations are provided that will limit this potential leakage path. Unit 2 will have similar limitations to provide the same protection. These changes will then not increase the likelihood of a malfunction of safety related equipment, increase the consequences of an accident previously analyzed nor create the possibility of a malfunction different than previously evaluated. Therefore, based on the above, it is proposed to characterize the change as involving no significant hazards.