

**Enclosure 3 to
ULNRC-06696**

Proposed Technical Specification Changes (Mark-up)

(9 pages)

1.1 Definitions (continued)

CHANNEL OPERATIONAL TEST (COT)	A COT shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY. The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints required for channel OPERABILITY such that the setpoints are within the necessary range and accuracy. The COT may be performed by means of any series of sequential, overlapping, or total channel steps.
CORE ALTERATION	CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.
CORE OPERATING LIMITS REPORT (COLR)	The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific parameter limits shall be determined for each reload cycle in accordance with Specification 5.6.5. Plant operation within these limits is addressed in individual Specifications.
DOSE EQUIVALENT I-131	<p>DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries per gram) that alone would produce the same dose when inhaled as the combined activities of iodine isotopes I-131, I-132, I-133, I-134, and I-135 actually present. The determination of DOSE EQUIVALENT I-131 shall be performed using thyroid dose conversion factors from:</p> <ol style="list-style-type: none">1. Table III of TID-14844, AEC, 1962, "Calculation of Distance Factors for Power and Test Reactor Sites," or2. Table E-7 of Regulatory Guide 1.109, Revision 1, NRC, 1977, or3. International Commission on Radiological Protection (ICRP) Publication 30, "Limits for Intakes of Radionuclides by Workers," Supplement to Part 1, pages 192-212, Table titled "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity," 1979, or1. Table 2.1 of EPA Federal Guidance Report No. 11, EPA-520/1-88-020, "Limiting Values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion, and Ingestion," 1988.

(continued)

3.7 PLANT SYSTEMS

and equipment room envelope (ERE)

3.7.10 Control Room Emergency Ventilation System (CREVS)

LCO 3.7.10 Two CREVS trains shall be OPERABLE.

,

NOTE

The control room envelope (CRE) and control building envelope (CBE) boundaries may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, 3, and 4,
During movement of irradiated fuel assemblies.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CREVS train inoperable for reasons other than Condition B.	A.1 Restore CREVS train to OPERABLE status.	7 days

(continued)

ACTIONS (continued)			
CONDITION		REQUIRED ACTION	COMPLETION TIME
B. One or more CREVS trains inoperable due to an inoperable CRE boundary or an inoperable CBE boundary in MODE 1, 2, 3, or 4.	B.1	Initiate action to implement mitigating actions.	Immediately
	<u>AND</u>		
	B.2	Verify mitigating actions to ensure CRE occupant radiological exposure will not exceed limits and CRE occupants are protected from chemical and smoke hazards.	24 hours
	<u>AND</u>		
	B.3	Restore the CRE boundary and CBE boundary to OPERABLE status.	90 days
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, 3, or 4.	C.1	Be in MODE 3.	6 hours
	<u>AND</u>		
	C.2	Be in MODE 5.	36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies.</p>	<p>D.1 Place OPERABLE CREVS train in CRVIS mode.</p> <p><u>OR</u></p> <p>D.2.1 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>D.2.2 Suspend movement of irradiated fuel assemblies.</p>	<p>Immediately</p> <p>Immediately</p> <p>Immediately</p>
<p>E. Two CREVS trains inoperable during movement of irradiated fuel assemblies.</p> <p><u>OR</u></p> <p>One or more CREVS trains inoperable due to an inoperable CRE boundary or an inoperable CBE boundary during movement of irradiated fuel assemblies.</p>	<p>E.1 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>E.2 Suspend movement of irradiated fuel assemblies.</p>	<p>Immediately</p> <p>Immediately</p>
<p>F. Two CREVS trains inoperable in MODE 1, 2, 3, or 4 for reasons other than Condition B.</p>	<p>F.1 Enter LCO 3.0.3.</p>	<p>Immediately</p>

due to an inoperable CRE, CBE or ERE boundary

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.10.1	Operate each CREVS train pressurization filter unit for ≥ 15 continuous minutes with the heaters operating and each CREVS train filtration filter unit for ≥ 15 continuous minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.7.10.2	Perform required CREVS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.10.3	Verify each CREVS train actuates on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.7.10.4	Perform required unfiltered air leakage testing of the CRE and CBE boundaries in accordance with the Control Room Envelope Habitability Program.	In accordance with the Control Room Envelope Habitability Program

unfiltered air leakage testing of the CRE, CBE and ERE boundaries in accordance with the Control Room Envelope Habitability Program.

5.5 Programs and Manuals

5.5.11 Ventilation Filter Testing Program (VFTP) (continued)

- b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < 1.0% when tested at the system flowrate specified below.

ESF Ventilation System	Flowrate
Control Room Filtration	2000 cfm, ± 200 cfm
Control Room Pressurization	500 cfm, +500, -50 cfm
Emergency Exhaust System	9000 cfm, ± 900 cfm

- c. Demonstrate for each of the ESF systems within 31 days after removal that a laboratory test of a sample of the charcoal adsorber, when obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and the relative humidity specified below.

ESF Ventilation System	Penetration	RH
Control Room Filtration	2.0%	70%
Control Room Pressurization	2.0%	70%
Emergency Exhaust System	2.0%	70%

(as applicable)

- d. Demonstrate at least once per 18 months for each of the ESF systems that the pressure drop across the combined HEPA filters and the charcoal adsorbers is less than the value specified below when tested at the system flowrate specified below.

ESF Ventilation System	Delta P	Flowrate
Control Room Filtration	5.4" WG	2000 cfm, ± 200 cfm
Control Room Pressurization	5.4" WG	500 cfm, +500, - 50 cfm
Emergency Exhaust System	5.4" WG	9000 cfm, ± 900 cfm

* A charcoal adsorber is not required to be installed or included in either control room pressurization train.

(continued)

5.5 Programs and Manuals

5.5.11 Ventilation Filter Testing Program (VFTP) (continued)

- e. Demonstrate at least once per 18 months that the heaters for ~~each of~~ the ESF systems dissipate the value specified below when tested in accordance with ANSI 510-1975 and corrected to design nameplate voltage settings.

ESF Ventilation System	Wattage
Control Room Pressurization	5 ± 1 KW
Emergency Exhaust System	37 ± 3 KW

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

5.5.12 Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the Gaseous Radwaste System, the quantity of radioactivity contained in gas storage tanks and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks. The gaseous radioactivity quantities shall be determined following the methodology in Branch Technical Position (BTP) ETSB 11-5, "Postulated Radioactive Release due to Waste Gas System Leak or Failure, Revision 0". The liquid radwaste quantities shall be determined in accordance with Standard Review Plan, Section 15.7.3, "Postulated Radioactive Release due to Tank Failures, Revision 2".

The program shall include:

- The limits for concentrations of hydrogen and oxygen in the Gaseous Radwaste System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion);
- A surveillance program to ensure that the quantity of radioactivity contained in each gas storage tank is less than the amount that would result in a whole body exposure of ≥ 0.5 rem to any individual in an unrestricted area, in the event of an uncontrolled release of the tanks' contents; and
- A surveillance program to ensure that the quantity of radioactivity contained in the outdoor liquid radwaste tanks listed below that are not

(continued)

5.5 Programs and Manuals (continued)

5.5.17 Control Room Envelope Habitability Program

total effective dose equivalent (TEDE)

A Control Room Envelope (CRE) Habitability Program shall be established and implemented to ensure that CRE habitability is maintained such that, with an OPERABLE Control Room Emergency Ventilation System (CREVS), CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event **boundary, equipment room envelope (ERE) and the ERE boundary**. The program shall ensure that access to the CRE is provided to permit access and occupancy during accident (DBA) conditions without personnel receiving radiation exposures in excess of 5 rem ~~whole body or its equivalent to any part of the body~~ for the duration of the accident. The program shall include the following elements:

- a. The definition of the CRE, CRE boundary, control building envelope (CBE), ~~and the CBE boundary~~ **, CBE and ERE**
- b. Requirements for maintaining the CRE ~~and CBE~~ boundaries in their design condition, including configuration control and preventive maintenance. **, CBE and ERE**
- c. Requirements for (i) determining the unfiltered air leakage past the CRE-~~and CBE~~ boundaries in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.

The following exception is taken to Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0: **, CBE and ERE**

1. The Tracer Gas Test based on the Brookhaven National Laboratory Atmospheric Tracer Depletion (ATD) Method is used to determine the unfiltered air leakage past the CRE ~~and CBE~~ boundaries. The ATD Method is described in AmerenUE letters dated December 15, 2004 (ULNRC-05104), June 6, 2006 (ULNRC-05298), July 16, 2007 (ULNRC-05427), and October 30, 2007 (ULNRC-05448).
- d. Measurement, at designated locations, of the CRE pressure relative to the outside atmosphere during the pressurization mode of operation by one train of the CREVS, operating at the flow rate required by the VFTP, at a Frequency of 18 months on a STAGGERED TEST BASIS. The results shall be trended and used as part of the periodic assessment of the CRE boundary.

(continued)

5.5 Programs and Manuals

, CBE and ERE

5.5.17 Control Room Envelope Habitability Program (continued)

- e. The quantitative limits on unfiltered air leakage into CRE ~~and CBE~~. These limits shall be stated in a manner to allow direct comparison to the unfiltered air leakage measured by the testing described in paragraph c. The unfiltered air leakage limit for radiological challenges is the leakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air leakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumption ~~s.~~

, CBE and ERE s.
- f. The provisions of SR 3.0.2 are applicable to the Frequencies for assessing CRE habitability, determining CRE ~~and CBE~~ unfiltered inleakage, and measuring CRE pressure and assessing CRE ~~and CBE~~ as required by paragraphs c and d, ~~respectively~~.

5.5.18 Surveillance Frequency Control Program

the

, CBE and ERE

This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.

- a. The Surveillance Frequency Control Program shall contain a list of Frequencies of those Surveillance Requirements for which the Frequency is controlled by the program.
- b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program.