

Comment from Applicant

RO Question #67

K/A G2.4.16

Initial Conditions:

- Unit 1 reactor trip and SI occur due to a LOCA
- RWST level is 26% and lowering
- 19013-1, "Transfer to Cold Leg Recirculation," is in progress.

Current Conditions

- Crew is at Step 3 of 19013-1 "Initiate ATTACHMENT -1 to align ECCS Pumps to the Cold Leg Recirculation flowpath"
- STA reports a valid RED path exists on Core Cooling
- Neither Train of ECCS has been aligned for Cold Leg Recirculation

Which one of the following completes the following statement?

Based on the conditions given, the crew ___ (1) ___ required to immediately transfer to procedure 19221-1, "Response to Inadequate Core Cooling,"

And

Once procedure 19221-1 has been entered, the OATC ___ (2) ___ permitted to continue with subsequent steps of 19013-1 concurrently.

___ (1) ___
is NOT
is NOT
is
is

___ (2) ___
is
is NOT
is
is NOT

The first part of the question asks, based on current plant conditions, if a transition to the "Response to Inadequate Core Cooling" procedure is required. The current conditions state the crew is at step #3 of 19013-1, "Transfer to Cold Leg Recirculation". A note prior to step #1 of the "Transfer to Cold Leg Recirculation" procedure states "FRPs should not be implemented until at least one flow path exists from the CNMT sumps to the RCS Cold Legs and the completion of step #13." Per the bases of 19013-1, the intent of this note is to ensure the operation is done to align the Safety Injection systems to cold leg recirculation in a rapid manner to ensure core cooling is maintained. The safety injection systems include Residual Heat Removal, Safety Injection, and Charging. These steps ensure adequate core cooling through cold leg recirculation, no Critical Safety Functions (FRPs) could be successful until this evolution is complete. A transition to 19221-1, "Response to Inadequate Core Cooling" would not occur at this step. The answer to the first part of this question is "IS NOT".

The second half of this question states, "Once procedure 19221-1 has been entered, the OATC ___ (2) ___ permitted to continue with subsequent steps of 19013-1 concurrently."

Per the Transient Response Procedure User's Guide, NMP-AP-005-004, "There are cases where guidance provided in other procedures (AOPs, SOPs, ARPs, etc.) may be useful to enhance the EOP procedure performance. This usage may be directed by referencing steps in the controlling EOPs. In addition, operator judgment may be used to identify appropriate performance of other procedures in conjunction with an EOP to enhance equipment and personnel emergency response. EOP actions take priority. Other procedures may be performed in parallel with EOPs as long as their actions do not conflict with the EOP steps. In cases where conflicts are present, the operator should use the guidance contained in the EOPs, as well as their knowledge of the overall recovery strategy to determine the correct course of action.

The SS shall determine how many procedures (including AOPs and EOPs) will be implemented at a time, and their priority based on manpower availability and the particular event in progress. NLO's may be given the responsibility, commensurate with their qualifications, to implement the lower priority procedure when procedures are being performed concurrently."

During an event such as "Response to Inadequate Core Cooling", there are subsequent actions in 19013-1 which would be required to ensure all possible efforts are made to protect accident mitigating equipment as well as ensure adequate make up attempts are being made to the Refueling Water Storage Tank (RWST), as required.

Once 19013-1 is exited, the crew would "Return to procedure step in effect". Based on the initial conditions of a Safety Injection and LOCA, this would return the crew to 19010-1 "E-1 Loss of Reactor or Secondary Coolant". Once in 19010-1 (E-1), the crew can implement FRPs such as 19221-1 "Response to Inadequate Core Cooling".

However, the crew would continue to monitor RWST level for <8% to ensure the containment spray pumps are swapped to recirculation mode in 19013-1 "Transfer to Cold Leg Recirculation". This action would prevent cavitation of the Containment Spray pumps.

This action would be crucial in a scenario where containment pressure is high and the containment spray system could be used to mitigate the accident and prevent challenging containment integrity, the third barrier for release to the public. Additionally, actions isolating RHR from the RWST to prevent air entrainment in the system and disabling to VCT Low Level RWST swap over from the shutdown panels are still required in 19013-1. Instead of delaying further actions out of 19221-1, the shift supervisor, based on resources and competing priorities, can make the decision to implement both procedures concurrently based on NMP-AP-005-004, Transient Response Users. Therefore, "IS" is the correct answer for the second part of question #67.

The recommended change to the answer is "A". IS NOT, IS.

Licensee Recommendation
RO Question #67
K/A G2.4.16

The question provides that the crew has entered procedure 19013-1 due to RWST level lowering below 29%. It also states that neither Train of ECCS has been aligned to Cold Leg Recirculation. A note in 19013-1 states "FRPs should not be implemented until at least one flow path exists from the CNMT Sump to the RCS Cold Legs and the completion of Step 13." The question states a valid RED path exists for Core Cooling. Due to the note in 19013-1, entry to FRP 19221-1 is not permitted at this time and the crew should continue actions to align cold leg recirculation.

There are no issues with the first part of the question.

EOP usage is controlled by procedure NMP-AP-005-004, "Transient Response Procedure User's Guide." Procedure 19200-1, "F-0 Critical Safety Function Status Tree," requires the crew "immediately go to FRP" in the case of a valid RED path. The above-mentioned note prevents the crew from "going to" procedure 19221-1. Once the transition is permitted 19013-1 step #14 and the above-mentioned note state that "FRP implementation may resume at this time" NMP-AP-005-004 states that "Implement" is to "begin another guideline or procedure and follow it to completion (may be concurrent with procedure/task in progress)".

The completion of step #13 would be expected to occur prior to the RWST level going <8%. This would require performing the remaining steps of 19013-1 to prevent the Containment Spray Pumps from losing suction and adding an additional challenge to Containment integrity. NMP-AP-005-004 provides guidance for Operators to address the RWST Empty (8%) annunciator if it actuates. This annunciator is addressed in 17006-1, which states, "Actions for RWST empty level during SI are governed by 19013-1, "ES-1.3 Transfer to Cold Leg Recirculation."

NMP-AP-005-004 would permit Operators to perform the steps of 19013-1 to realign the Containment Spray Pump suction source from the RWST to the Recirculation Sump concurrent with the steps of 19221-1 as long as the steps do not impede the performance of or conflict with the actions of 19221-1.

Recommend changing the answer to "A" for this question.

TERMS AND ACTION VERBS

Verb	Application
Fill	<p>To add fluid to the greatest extent possible to a system or component.</p> <p>"Fill the PCCWST."</p>
Go To	<p>Used to branch to another procedure. Specifies that the procedure in effect be exited and the named procedure performed.</p> <p>"Go to 3-EOP-E-1, Loss of Reactor or Secondary Coolant."</p>
Hold	<p>Used with switches. To maintain a given condition or action.</p> <p>"Hold the Reactor Head Vent Valve handswitch in the open position until the valve is open."</p>
Identify	<p>To ascertain the condition by investigation.</p> <p>"Identify the faulted SG."</p>
Increase	<p><u>Do not</u> use because of verbal communication problems.</p>
<u>Implement</u>	<p><u>To begin another guideline or procedure and follow it to completion (may be concurrent with procedure/task in progress).</u></p> <p>"Implement the Emergency Plan"</p>
Inspect	<p>To measure, observe, or evaluate a feature or characteristic for comparison with specified limits; method of inspection should be included.</p> <p>"Visually inspect the Main Feedlines for leaks."</p>
Isolate	<p>To remove from service and prevent further electrical or fluid flow across the system or component boundaries.</p> <p>"Isolate the faulted SG."</p>
Jog	<p>To actuate components by a series of small changes or for short durations.</p> <p>"Jog ADS-1 valves open to reduce RCS pressure."</p>

4.3.14 Procedure Applicability while in the EOP Network

1. Upon entry into the Emergency Response network, EOP guidance is the governing direction. The EOP network is designed so that a single procedure always has priority when addressing emergency events. Other procedures may be utilized or performed concurrently, but the successful event mitigation strategy is always governed by a single EOP. The governing procedure will change based on plant conditions and procedure transition criteria.
2. There are cases where guidance provided in other procedures (AOPs, SOPs, ARPs, etc.) may be useful to enhance the EOP procedure performance. This usage may be directed by referencing steps in the controlling EOPs. In addition, operator judgment may be used to identify appropriate performance of other procedures in conjunction with an EOP in order to enhance equipment and personnel emergency response. EOP actions take priority.
3. Other procedures may be performed in parallel with EOPs as long as their actions do not conflict with the EOP steps. In cases where conflicts are present, the operator should use the guidance contained in the EOPs, as well as his knowledge of the overall recovery strategy to determine the correct course of action.
4. The SS shall determine how many procedures (including AOPs and EOPs) will be implemented at a time, and their priority based on manpower availability and the particular event in progress. NLO's may be given the responsibility, commensurate with their qualifications, to implement the lower priority procedure when procedures are being performed concurrently.
5. Emergency Operating Procedures and Technical Specifications
 - a. EOP implementation during accident conditions may violate Technical Specifications; these violations were considered in the AP1000 EOP development process and are permissible (e.g. opening CVS-V091 during a lower mode LOCA).
 - b. Unless otherwise specified by the EOP (e.g. isolating unborated water sources when required in ES-0.1) or another procedure referenced by the EOP, Technical Specifications surveillance and monitoring requirements for which the operator has responsibility and which would normally be performed as part of the evolution in progress are suspended until the EOPs are completed.
 - c. Based on the above discussion, the operator shall not delay or ignore performance of EOP actions solely because a Technical Specification limitation will be exceeded.
 - d. The on-shift SROs shall evaluate applicable Technical Specifications prior to exiting the EOPs and returning to the GOP network.

SUBSEQUENT OPERATOR ACTIONS**ACTION/EXPECTED RESPONSE****RESPONSE NOT OBTAINED****NOTE**

FRPs should not be implemented until at least one flow path exists from the CNMT Sump to the RCS Cold Legs and the completion of Step 13. [KP1]

CAUTIONS

- SI recirculation flow to RCS must be maintained at all times.
- If offsite power is lost after SI reset, action is required to restart the following ESF equipment if plant conditions require their operation:
 - RHR Pumps
 - SI Pumps
 - Post-LOCA Cavity Purge Units
 - Containment Coolers in low speed (Started in high speed on a UV signal).
 - ESF Chilled Water Pumps (If CRI is reset).

1. **Verify SI Reset.**

2. **CNMT Emergency Sump level - GREATER THAN OR EQUAL TO 12 INCHES:**

1-LI-764

1-LI-765

3. **Initiate ATTACHMENT - 1 to align ECCS Pumps to the Cold Leg Recirculation flowpath.**

1. **IF SI will NOT reset, THEN Initiate ATTACHMENT - 2.**

2. **IF CNMT Sump level indicators 1-LI-764 and 1-LI-765 are both less than 12 INCHES, THEN Stop RHR Pumps A and B AND Go To 19111-1, ECA 1.1 LOSS OF EMERGENCY COOLANT RECIRCULATION.**

SUBSEQUENT OPERATOR ACTIONS (continued)

ACTION/EXPECTED RESPONSERESPONSE NOT OBTAINED

- Close RWST TO RHR PMP-A SUCTION 1-HV-8812A.
- Close RWST TO RHR PMP-B SUCTION 1-HV-8812B.

13. Check at least one flow path exists from CNMT Sump to RCS Cold Legs:

RCS Cold Leg injection from CCPs:

- RHR supplying CCP suction header.
- CCP(s) injecting through the BIT.

-OR-

RCS Cold Leg injection from SIPs:

- RHR supplying SIP suction header.
- SIP(s) injecting into RCS Cold Legs.

14. FRP implementation may resume at this time.**15. Dispatch an operator to the Shutdown Panels to disable RWST TO CCP A&B SUCTION Valves:**

a. At Shutdown Panel A:

- (1) Place 1-HS-0112H in local.
- (2) Verify 1-LV-0112D is closed.

b. At Shutdown Panel B:

- (1) Place 1-HS-0112F in local.
- (2) Verify 1-LV-0112E is closed.

13. Recheck valve alignment and Pump status.

IF one complete injection path can NOT be established between the CNMT Sump and the RCS Cold Legs,
THEN
Go To 19111-1, ECA 1.1 LOSS OF EMERGENCY COOLANT RECIRCULATION.

SUBSEQUENT OPERATOR ACTIONS (continued)

ACTION/EXPECTED RESPONSERESPONSE NOT OBTAINED**4. Initiate the following:**

- Notify RP that radiation levels in the Auxiliary Building will change when Cold Leg Recirculation is established.
- Make a page announcement to clear personnel from the Auxiliary Building prior to initiating Cold Leg Recirculation.
- Initiate Continuous Actions Page.

5. Check RWST level – GREATER THAN 8%.**5. Stop any ECCS Pumps and CS pumps taking suction from the RWST.****6. Check ATTACHMENT - 1 - COMPLETE.****6. Go To Step 5.****7. Restart the ECCS Pumps AND CS pumps in the following order as necessary:**

- a. RHR
- b. SI
- c. CCP
- d. CS

8. Check RWST level – LESS THAN OR EQUAL TO 8%.**8. WHEN RWST level lowers to less than 8%.****THEN****Return to Step 8 of this procedure.****Go To Step 15****CAUTION**

Local observation of CS Pump suction and discharge pressure gauges should only be performed if radiation levels permit. (AB D75)

4.1 4.1 Detailed Description of Steps, Notes, and Cautions (continued)

Section: Procedure

Unit 1 EOP Step: Step-8	Unit 2 EOP Step: Step-8	PWROG ERG Step: NA
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Vogtle Step Text:

Check RWST level – LESS THAN OR EQUAL TO 8%.

PWROG Step Text:

NA

Purpose:

Check for conditions met for swapping CS pump suction.

Basis:

This step is included as a reminder that the spray system should be realigned, when RWST level reaches 8% to take suction from the containment sump.

Knowledge:

NA

Plant Specific Information:

NA

References:

None

Justification of Differences:

Step added as a backup to the RWST alarm.



WINDOW E05

ORIGIN

SETPOINT

1-LT-0990
1-LT-0991
1-LT-0992
1-LT-0993

8%
(1/4 channels)

**RWST
EMPTY LEVEL**

1.0 **PROBABLE CAUSE**

1. Refueling Water Storage Tank (RWST) in use for Safety Injection (SI).
2. RWST in use for refueling.
3. System leakage.

2.0 **AUTOMATIC ACTIONS**

NONE

3.0 **INITIAL OPERATOR ACTIONS**

NOTE

Actions for RWST empty level during SI are governed by 19013-C, "ES-1.3 Transfer to Cold Leg Recirculation."

4.0 **SUBSEQUENT OPERATOR ACTIONS**

1. While in Modes 5 or 6 and the RCS or Reactor cavity filling operations are not in progress, **dispatch** personnel to locate and isolate the leak.
2. While in Modes 5 or 6, RWST level should be maintained greater than 5%. Makeup to the RWST, if necessary, per 13701-2, "Boric Acid System."
3. **Refer** to Technical Requirements Manual TR 13.1.6.

Comment from Applicant

SRO Question #8
K/A 050G2.2.45

Initial conditions:

- Both Units are at 100% reactor power.
- Unit 2 'B' Train CREFS is tagged out.

Current conditions:

- Unit 1 'A' Train CREFS is deemed inoperable due to breaker malfunction.
- OATC reports that the Control Room Temperature is 78F and slowly rising at a rate of 2F per hour.

Which one of the following completes the following statement?

Per Tech Spec 3.7.10, "Control Room Emergency Filtration System (CREFS) – Both Units Operating," the operating crew is required to ___(1)___ when required completion time of Condition B is not met,

and

Control Room Tech Spec air temperature limit will first be exceeded in ___(2)___ hours.

___(1)___ ___(2)___

- A. Be in Mode 3 4
- B. Be in Mode 3 6
- C. Start 2 CREFS Units 4
- D. Start 2 CREFS Units 6

The question stem provides a condition in which one CREFS on each Unit is declared inoperable with both units at 100% power. Based on these conditions, Tech Spec 3.7.10 Condition B is entered with a completion time of 7 days.

The first part of the question asks what the operating crew is required to do when the completion time of Condition B is not met. The answers provided are "Be in Mode 3" or "Start 2 CREFS Units." When the 7 day completion time expires on 3.7.10 Condition B, 3.7.10 Condition F is entered which requires action to be initiated to place the unit in Mode 3 within 7 hours. The required action is NOT to "Be in Mode 3" as soon as 3.7.10 Condition B is not met. Per the Use and Application Chapter, Completion Time Section, of Technical Specifications, an example is provided (TS Example 1.3-2, shown below) in which it is demonstrated that when a required action is not met and another condition

subsequently entered, the required actions of the first condition are still required to be completed even after the first condition's required action completion time is not met. Applying this example to 3.7.10 and the question asked if the actions of 3.7.10 Condition B are completed (Start 2 CREFS Units) AFTER the 3.7.10 Condition B completion time has expired but before the 3.7.10 Condition F completion time is exceeded, 3.7.10 Condition F would be exited. The action to continue shutting down the units to Mode 3 would be terminated.

Furthermore, the bases of 3.7.10 Condition F state, "The allowed Completion Times are reasonable, based on operating experience, to perform the Required Actions and to reach the required unit conditions from full power conditions in an orderly manner without challenging unit systems" indicating that an immediate shutdown to Mode 3 is NOT the intent.

Therefore, per the Bases and Tech Specs rules of usage, "Start 2 CREFS Units" is still a required action and is more correct than immediately placing the units in Mode 3 following 3.7.10 Condition B being not met. The correct answer to the first part of this question is "Start 2 CREFS Units".

The second part of this question asks the length of time before the control room Tech Spec temperature limit of 85F would first be exceeded. The answers provided are "4" or "6" hours. Based on the given information with temperature rising 2F per hour and an initial temperature of 78F, after 4 hours, the temperature would have risen to 86F which exceeds the control room temperature limit. The correct answer to the second part of this question is "4" hours.

It is recommended the answer to SRO Question #8 be changed from the incorrect answer "A" to the correct answer "C".

EXAMPLE 1.3-2 CONDITIONS AND LCO 3.0.3 ENTRY/COMPLETION TIME CLOCK/COMPLETION TIME EXTENSION

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One pump inoperable.	A.1 Restore pump to OPERABLE status.	7 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 5.	36 hours

When a pump is declared inoperable, Condition A is entered. If the pump is not restored to OPERABLE status within 7 days, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the inoperable pump is restored to OPERABLE status after Condition B is entered, Conditions A and B are exited, and therefore, the Required Actions of Condition B may be terminated.

Licensee Recommendation
SRO Question #8
K/A 050G2.2.45

The question tests the applicant's knowledge of greater than 1-hour Technical Specification pertaining to the Control Room Ventilation System.

Tech Spec 3.7.10, "Control Room Emergency Filtration System (CREFS) - Both Units Operating states that Four CREFS trains shall be operable in Modes 1-4. Condition 'A' is one CREFS train inoperable for reasons other than Condition 'D'. Condition 'B' is one CREFS train inoperable in each unit for other than Condition 'D'. Condition 'C' is two CREFS trains inoperable in one unit for reasons other than Condition 'D'. Condition 'D' is one or more CREFS trains inoperable due to inoperable CRE boundary. Based on provided information, Condition 'B' applies. Condition 'E' also applies, and that is Control Room air temperature not within limit.

Condition 'B' requires the crew to place two Operable trains in the emergency mode within 7 days. If condition B is not met within 7 days, Condition 'F' must be entered. Condition 'F' requires the Units be placed in MODE 3 within 7 hours.

The first part of the question asks, "Per Tech Spec 3.7.10, "Control Room Emergency Filtration System (CREFS) - Both Units Operating," the operating crew is required to ___ (1) ___ when required completion time of Condition B is not met."

The keyed answer is "be in MODE 3".

When the completion time for Condition 'B' (7 days) is not met the unit has 7 hours to be in MODE 3. The answer implies that the unit is to be in MODE 3 when the 7-day clock for Condition 'B' expires. This is not true. The plant is given a reasonable amount of time (7 hours) to perform an orderly plant shutdown. Based on the given plant conditions the option of placing the 2 Operable CREFS Trains in service, to avoid going to MODE 3 does exist.

There are no issues with the second part of the question.

Recommend changing the answer to "C" for this question.

3.7 PLANT SYSTEMS

3.7.9 Ultimate Heat Sink (UHS)

LCO 3.7.9 The UHS shall be OPERABLE. The fans/spray cells shall be as specified in Figure 3.7.9-1.

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

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Nuclear Service Cooling Water (NSCW) basins with water temperature and/or water level not within limits.	A.1 Restore water temperature(s) and water level(s) to within limits.	72 hours
B. One NSCW cooling tower with one required fan/spray cell inoperable when operating in four fan/spray cell required region of Figure 3.7.9-1.	B.1 Restore fan to OPERABLE status.	7 days <u>OR</u> In accordance with the Risk Informed Completion Time Program
C. One NSCW cooling tower with one or more required fans/spray cells inoperable for reasons other than Condition B.	C.1 Restore fan(s)/spray cell(s) to OPERABLE status.	72 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program

(continued)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.9.1	Verify water level of NSCW basin is ≥ 80.25 ft.	In accordance with the Surveillance Frequency Control Program
SR 3.7.9.2	Verify water temperature of NSCW basin is $\leq 90^{\circ}\text{F}$.	In accordance with the Surveillance Frequency Control Program
SR 3.7.9.3	Operate each required NSCW cooling tower fan for ≥ 15 minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.7.9.4	Verify NSCW basin transfer pump operation.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.7.9.5	Verify ambient wet-bulb temperature is within the three fan/spray cell region of Figure 3.7.9-1 when one NSCW tower fan/spray cell is out-of-service and daily high temperature (dry-bulb) is forecasted to be $> 48^{\circ}\text{F}$.	In accordance with the Surveillance Frequency Control Program

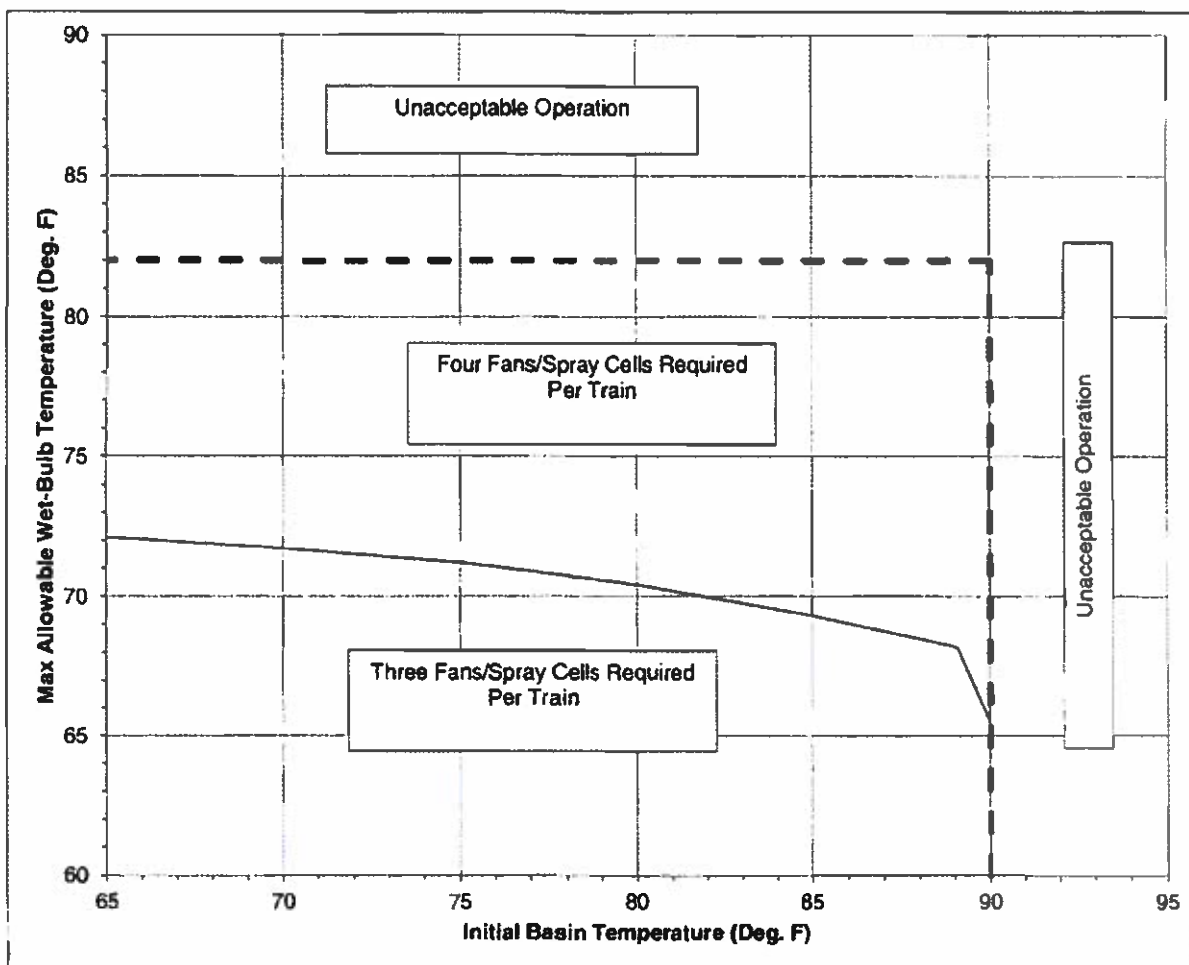


Figure 3.7.9-1
Required Number of Fans/Spray Cells

3.7 PLANT SYSTEMS

3.7.10 Control Room Emergency Filtration System (CREFS) - Both Units Operating

LCO 3.7.10 Four CREFS trains shall be OPERABLE.

-----NOTE-----

The control room envelope (CRE) boundary may be opened intermittently under administrative control.

APPLICABILITY: Both Units in MODES 1, 2, 3, or 4

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CREFS train inoperable for reasons other than Condition D.	A.1 Place one CREFS train in the unaffected unit in the emergency mode.	7 days
B. One CREFS train inoperable in each unit for reasons other than Condition D.	B.1 Place two OPERABLE CREFS trains in the emergency mode.	7 days
C. Two CREFS trains inoperable in one unit for reasons other than Condition D.	C.1 Place two CREFS trains in the unaffected unit in the emergency mode.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Required Action and associated Completion Time of Condition A, B, or D not met.</p>	<p>F.1 -----NOTE----- Required Action F.1 is not applicable when entering this Condition from Condition B or D. ----- Lock closed the outside air (OSA) intake dampers of the affected unit and lock open the OSA intake dampers of the unaffected unit.</p>	<p>1 hour</p>
	<p><u>AND</u></p>	
	<p>F.2 Place the affected units(s) in MODE 3.</p>	<p>7 hours</p>
	<p><u>AND</u></p>	
	<p>F.3 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Place the affected unit(s) in MODE 4.</p>	<p>13 hours</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>G. Required Action and associated Completion Time of Condition C or E not met.</p>	<p>G.1 -----NOTE----- Required Action G.1 is not applicable when entering this Condition from Condition E. -----</p> <p>Lock closed the outside air (OSA) intake dampers of the affected unit and lock open the OSA intake dampers of the unaffected unit.</p>	<p>1 hour</p>
	<p><u>AND</u></p>	
	<p>G.2 Place the affected units(s) in MODE 3.</p>	<p>7 hours</p>
	<p><u>AND</u></p> <p>G.3 Place the affected unit(s) in MODE 5.</p>	<p>37 hours</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.10.1 Verify control room air temperature $\leq 85^{\circ}\text{F}$.	In accordance with the Surveillance Frequency Control Program
SR 3.7.10.2 Operate each CREFS train for ≥ 15 continuous minutes with the heater control circuit energized.	In accordance with the Surveillance Frequency Control Program
SR 3.7.10.3 Perform required CREFS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.10.4 Verify each CREFS train actuates (switches to emergency mode) on an actual or simulated actuation signal, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program
SR 3.7.10.5 Perform required CRE unfiltered air inleakage testing in accordance with the Control Room Envelope Habitability Program.	In accordance with the Control Room Envelope Habitability Program