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CNRO2026-00013 10 CFR 50.90

November 10, 2026

ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Application to Revise Technical Specifications to Adopt TSTF-602, "Revise the Ventilation Filter Testing Program to Permit Alternate Challenge Agents"

Arkansas Nuclear One, Unit 1
NRC Docket No. 50-313
Renewed Facility Operating
License No. DPR-51

Arkansas Nuclear One, Unit 2
NRC Docket No. 50-368
Renewed Facility Operating
License No. NPF-6

Grand Gulf Nuclear Station, Unit 1
NRC Docket No. 50-416
Renewed Facility Operating
License No. NPF-29

River Bend Station, Unit 1
NRC Docket No. 50-458
Renewed Facility Operating
License No. NPF-47

Waterford Steam Electric Station, Unit 3
NRC Docket No. 50-382
Renewed Facility Operating
License No. NPF-38

Pursuant to 10 CFR 50.90, Entergy Operations, Inc. (Entergy) is submitting a request for an amendment to the Technical Specifications (TS) for Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2), Grand Gulf Nuclear Station, Unit 1 (GGNS), River Bend Station, Unit 1 (RBS), and Waterford Steam Electric Station, Unit 3 (WF3).

Entergy requests adoption of TSTF-602, "Revise the Ventilation Filter Testing Program to Permit Alternate Challenge Agents," which is an approved change to the Standard Technical Specifications (STS), into the ANO-1, ANO-2, GGNS, RBS, and WF3 TS. TSTF-602 revises the Ventilation Filter Testing Program (VFTP) to permit the use of alternate challenge agents when performing inplace testing of Engineered Safety Feature (ESF) ventilation system high efficiency particulate air (HEPA) filters and charcoal adsorbers. The alternative challenge agents are permitted by industry standards and Nuclear Regulatory Commission (NRC) Regulatory Guides (RGs).

The enclosure provides a description and assessment of the proposed change.

- Attachments 1 through 5 of the enclosure provide the existing TS pages for each Entergy nuclear facility marked to show the proposed changes.

- Attachments 6 through 10 provide retyped (clean) TS pages for each Entergy nuclear facility.

Entergy requests that the amendment be reviewed under the Consolidated Line Item Improvement Process (CLIIP). Once approved, the amendment shall be implemented within 90 days.

There are no new regulatory commitments made in this submittal.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Arkansas, Louisiana, and Mississippi State Officials.

Should you have any questions or require additional information, please contact me at 601-368-5102.

I declare under penalty of perjury, that the foregoing is true and correct.
Executed on November 10, 2026.

Respectfully,

Philip Couture

Digitally signed by Philip Couture
Date: 2026.11.10 06:42:00 -06'00'

Phil Couture

PC/rwc

Enclosure: Description and Assessment

Attachments to Enclosure:

1. Technical Specification Page Markups – ANO-1
2. Technical Specification Page Markups – ANO-2
3. Technical Specification Page Markups – GGNS
4. Technical Specification Page Markups – RBS
5. Technical Specification Page Markups – WF3
6. Technical Specification Pages Retyped – ANO-1
7. Technical Specification Pages Retyped – ANO-2
8. Technical Specification Pages Retyped – GGNS
9. Technical Specification Pages Retyped – RBS
10. Technical Specification Pages Retyped – WF3

cc: NRC Region IV Regional Administrator
NRC Senior Resident Inspector – ANO-1 ANO-2 GGNS RBS WF3
NRC Project Manager – Entergy Fleet
Designated State Official – Arkansas, Mississippi, Louisiana

Enclosure

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Description and Assessment

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DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

Entergy Operations, Inc. (Entergy) requests adoption of TSTF-602, "Revise the Ventilation Filter Testing Program to Permit Alternate Challenge Agents," which is an approved change to the Standard Technical Specifications (STS), into the Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2), Grand Gulf Nuclear Station, Unit 1 (GGNS), River Bend Station, Unit 1 (RBS), and Waterford Steam Electric Station, Unit 3 (WF3) Technical Specifications (TS). TSTF-602 revises the Ventilation Filter Testing Program (VFTP) to permit the use of alternate challenge agents when performing inplace testing of Engineered Safety Feature (ESF) ventilation system high efficiency particulate air (HEPA) filters and charcoal adsorbers. The alternative challenge agents are permitted by industry standards and Nuclear Regulatory Commission (NRC) Regulatory Guides (RGs).

2.0 ASSESSMENT

2.1 Applicability of Safety Evaluation

Entergy has reviewed the safety evaluation for TSTF-602 provided to the Technical Specifications Task Force in a letter dated December 11, 2025. This review included the NRC staff's evaluation, as well as the information provided in TSTF-602. Entergy has concluded that the justifications presented in TSTF-602 and the safety evaluation prepared by the NRC staff are applicable to ANO-1, ANO-2, GGNS, RBS, and WF3 and justify this amendment for the incorporation of the changes to the ANO-1, ANO-2, GGNS, RBS, and WF3 TS.

2.2 Variations

Entergy is proposing variations from the TS changes described in TSTF-602 or the applicable parts of the NRC staff's safety evaluation.

2.2.1 ANO-1

The ANO-1 TS are based on NUREG-1430, "Standard Technical Specifications, Babcock and Wilcox Plants." TSTF-602 is also based on NUREG-1430.

- The ANO-1 TS utilizes different numbering than the STS on which TSTF-602 was based. Specifically, the Ventilation Filter Testing Program (VFTP) is TS 5.5.10 in the STS and is TS 5.5.11 in the ANO-1 TS. This difference is administrative and does not affect the applicability of TSTF-602 to the ANO-1 TS.

- The ANO-1 VFTP refers to testing the Engineered Safeguards (ES) ventilation systems, and the STS VFTP refers to testing the Engineered Safety Feature (ESF). This difference is administrative and does not affect the applicability of TSTF-602 to the ANO-1 TS.

- The ANO-1 VFTP references DOP (dioctyl phthalate) and halogenated hydrocarbon as the challenge agents. As discussed in Section 3.4, "Plant-Specific Variations," of TSTF-602, "Plant TS may explicitly reference the use of DOP, halogenated hydrocarbon refrigerant test gas, or Freon (a commercial name for R-11). Removal of these challenge agent descriptions and addition of the proposed challenge agent exception is within the scope of the proposed change." The references to DOP and halogenated hydrocarbon challenge agents are removed.

- The ANO-1 VFTP, Paragraphs a and b, describe the acceptance criteria in terms of removal efficiency. The STS VFTP provides the acceptance criteria in terms of penetration and system bypass percentage. This difference does not affect the proposed change, which does not affect the accident analysis assumptions.

These differences are administrative and do not affect the applicability of TSTF-602 to the ANO-1 TS.

2.2.2 ANO-2

The ANO-2 TS are based on NUREG-0212, "Standard Technical Specifications, Combustion Engineering Plants." TSTF-602 is based on NUREG-1432 of the same title.

- The ANO-2 TS utilizes different numbering than the STS on which TSTF-602 was based. Specifically, the Ventilation Filter Testing Program (VFTP) is TS 5.5.10 in the STS and is TS 6.5.11 in the ANO-2 TS. This difference is administrative and does not affect the applicability of TSTF-602 to the ANO-2 TS.

- The ANO-2 VFTP refers to testing the Engineered Safeguards (ES) ventilation systems, and the STS VFTP refers to testing the Engineered Safety Feature (ESF) ventilation systems. This difference is administrative and does not affect the applicability of TSTF-602 to the ANO-2 TS.

- The ANO-2 VFTP references DOP (dioctyl phthalate) and halogenated hydrocarbon as the challenge agents. As discussed in Section 3.4, "Plant-Specific Variations," of TSTF-602, "Plant TS may explicitly reference the use of DOP, halogenated hydrocarbon refrigerant test gas, or Freon (a commercial name for R-11). Removal of these challenge agent descriptions and addition of the proposed challenge agent exception is within the scope of the proposed change." The references to DOP and halogenated hydrocarbon challenge agents are removed.

- The ANO-2 VFTP, Paragraphs a and b, describe the acceptance criteria in terms of removal efficiency. The STS VFTP provides the acceptance criteria in terms of penetration and system bypass percentage. This difference does not affect the proposed change, which does not affect the accident analysis assumptions.

These differences are administrative and do not affect the applicability of TSTF-602 to the ANO-2 TS.

2.2.3 GGNS

The GGNS TS are based on NUREG-1434, "Standard Technical Specifications, General Electric BWR/6 Plants." TSTF-602 is also based on NUREG-1434. Entergy is not proposing any variations from the TS changes described in TSTF-602 or the applicable parts of the NRC staff's safety evaluation for GGNS.

2.2.4 RBS

The RBS TS are based on NUREG-1434, "Standard Technical Specifications, General Electric BWR/6 Plants." TSTF-602 is also based on NUREG-1434. Entergy is not proposing any variations from the TS changes described in TSTF-602 or the applicable parts of the NRC staff's safety evaluation for RBS.

2.2.5 WF3

The WF3 TS are based on NUREG-0212, "Standard Technical Specifications, Combustion Engineering Plants." TSTF-602 is based on NUREG-1432 of the same title.

- The WF3 TS utilizes different numbering than the STS on which TSTF-602 was based. Specifically, the Ventilation Filter Testing Program (VFTP) is TS 5.5.10 in the STS and is TS 6.5.10 in the WF3 TS. This difference is administrative and does not affect the applicability of TSTF-602 to the WF3 TS.

These differences are administrative and do not affect the applicability of TSTF-602 to the WF3 TS.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Analysis

Entergy Operations, Inc. (Entergy) requests adoption of TSTF-602, "Revise the Ventilation Filter Testing Program to Permit Alternate Challenge Agents," which is an approved change to the Standard Technical Specifications (STS), into the Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2), Grand Gulf Nuclear Station, Unit 1 (GGNS), River Bend Station, Unit 1 (RBS), and Waterford Steam Electric Station, Unit 3 (WF3) Technical Specifications (TS). TSTF-602 revises the Ventilation Filter Testing Program (VFTP) to permit the use of alternate challenge agents when performing inplace testing of Engineered Safety Feature (ESF) ventilation system high efficiency particulate air (HEPA) filters and charcoal adsorbers. The alternative challenge agents are permitted by industry standards and Nuclear Regulatory Commission (NRC) Regulatory Guides (RGs).

Entergy has evaluated if a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No

   The proposed change permits the use of NRC-approved alternate challenge agents when testing HEPA filters and charcoal adsorbers in ESF ventilation systems. The performance of ventilation system testing is not an initiator to any accident previously evaluated. As a result, the probability of any accident previously evaluated is not significantly increased. The results of HEPA filter and charcoal adsorber testing using the alternative challenge agents will continue to determine if the ESF ventilation systems can perform the functions assumed in the accident analysis. As a result, the consequences of any accident previously evaluated are not significantly increased.

   Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: No

   The proposed change permits the use of NRC-approved alternate challenge agents when testing HEPA filters and charcoal adsorbers in ESF ventilation systems. No new or different accidents result from utilizing the proposed change. The changes do not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. The ESF ventilation system testing methods will not change other than the challenge agent. In addition, the changes do not impose any new or different requirements. The changes do not alter assumptions made in the safety analysis. The proposed changes are consistent with the safety analysis assumptions and current plant operating practice.

   Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

   Response: No

   The proposed change permits the use of NRC-approved alternate challenge agents when testing HEPA filters and charcoal adsorbers in ESF ventilation systems. The proposed change does not negate any existing requirement, and does not adversely affect existing plant safety margins or the reliability of the equipment assumed to operate in the safety analysis. As such, there are no changes being made to safety analysis assumptions, safety limits or limiting safety system settings that would adversely affect plant safety as a result of the proposed change. The ESF ventilation filter testing acceptance criteria are not changed, and, as a result, the margins of safety are unaffected.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based upon the reasoning presented above, Entergy concludes that the requested change involves no significant hazards consideration, as set forth in 10 CFR 50.92(c), "Issuance of Amendment," and, accordingly, a finding of "no significant hazards consideration" is justified.

3.2 Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

4.0 ENVIRONMENTAL CONSIDERATION

A review has determined the proposed change qualifies for a categorical exclusion from environmental review in accordance with 10 CFR 51.22. The proposed action is confined to changes to surveillance, inspection, or testing requirements as described in 10 CFR 51.22(d)(1). The proposed action does not disturb any previously undisturbed ground and there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, does not result in a significant increase in individual or cumulative public or occupational radiation exposure, and does not result in a significant increase in the potential for or consequences from radiological accidents. Therefore, pursuant to 10 CFR 51.22, neither an environmental assessment nor an environmental impact statement is required.

Enclosure, Attachment 1

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Technical Specification Page Markups – ANO-1

(2 TS Page Follows)

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

5.5.11 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safeguards (ES) ventilation systems filters at the periodic Frequencies in accordance with the Surveillance Frequency Control Program and the event-based frequencies specified in Regulatory Guide 1.52, Revision 2. The VFTP is applicable to the Penetration Room Ventilation System (PRVS) and the Control Room Emergency Ventilation System (CREVS).

a. Demonstrate that an inplace ~~cold DOP~~ test of the high efficiency particulate (HEPA) filters shows:

1. ≥ 99% ~~DOP~~ removal for the PRVS when tested at the system design flowrate of 1800 scfm ± 10%; and

2. ≥ 99.95% ~~DOP~~ removal for the CREVS when tested in accordance with Regulatory Guide 1.52, Revision 2, at the system design flowrate of 2000 cfm ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.3.

b. Demonstrate that an inplace ~~halogenated hydrocarbon~~ test of the charcoal adsorbers shows:

1. ≥ 99% ~~halogenated hydrocarbon~~ removal for the PRVS when tested at the system design flowrate of 1800 cfm ± 10%; and

2. ≥ 99.95% ~~halogenated hydrocarbon~~ removal for the CREVS when tested in accordance with Regulatory Guide 1.52, Revision 2, at the system design flowrate of 2000 cfm ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.4.

~~c. Demonstrate that a laboratory test of a sample of the charcoal adsorber meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30°C and 95% relative humidity for a methyl iodide penetration of:~~

~~1. < 5% for the PRVS;~~

~~2. when obtained as described in Regulatory Guide 1.52, Revision 2, for CREVS~~

~~i. ≤ 2.5% for 2 inch charcoal adsorber beds; and~~

~~ii. ≤ 0.5% for 4 inch charcoal adsorber beds.~~

Move to Pg 5.0-15a

Move to Pg 5.0-15a

d. Demonstrate for the PRVS and CREVS, that the pressure drop across the combined HEPA filters, other filters in the system, and the charcoal adsorbers is < 6 inches of water when tested at the following system design flowrates ± 10%:

PRVS	1800 cfm	CREVS	2000 cfm

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

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

5.5.11 Ventilation Filter Testing Program (VFTP) (continued)

Move from Pg 5.0-15

c. Demonstrate that a laboratory test of a sample of the charcoal adsorber meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30°C and 95% relative humidity for a methyl iodide penetration of:

1. < 5% for the PRVS;

2. when obtained as described in Regulatory Guide 1.52, Revision 2, for CREVS

   i. ≤ 2.5% for 2 inch charcoal adsorber beds; and

   ii. ≤ 0.5% for 4 inch charcoal adsorber beds.

d. Demonstrate for the PRVS and CREVS, that the pressure drop across the combined HEPA filters, other filters in the system, and the charcoal adsorbers is < 6 inches of water when tested at the following system design flowrates ± 10%:

PRVS	1800 cfm	CREVS	2000 cfm

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

Enclosure, Attachment 2

CNRO2026-00013

Technical Specification Page Markups – ANO-2

(1 TS Page Follows)

6.5.11 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safeguards (ES) ventilation systems filters at the periodic Frequencies in accordance with the Surveillance Frequency Control Program and the event-based frequencies specified in Regulatory Guide 1.52, Revision 2. The VFTP is applicable to the Control Room Emergency Ventilation System (CREVS).

a. Demonstrate that an inplace ~~cold DOP~~ test of the high efficiency particulate (HEPA) filters shows ≥ 99.95% ~~DOP~~ removal when tested in accordance with Regulatory Guide 1.52, Revision 2, at the system design flowrate of 2000 cfm ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.3.

b. Demonstrate that an inplace ~~halogenated hydrocarbon~~ test of the charcoal adsorbers shows ≥ 99.95% ~~halogenated hydrocarbon~~ removal when tested in accordance with Regulatory Guide 1.52, Revision 2, at the system design flow rate of 2000 cfm ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.4.

c. Demonstrate that a laboratory test of a sample of the charcoal adsorber meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30 °C and 95% relative humidity for a methyl iodide penetration of:

   1. ≤ 2.5% for 2 inch charcoal adsorber beds, and

   2. ≤ 0.5% for 4 inch charcoal adsorber beds,

   when obtained as described in Regulatory Guide 1.52, Revision 2.

d. Demonstrate that the pressure drop across the combined HEPA filters, other filters in the system, and charcoal adsorbers is < 6 inches of water when tested at the following system design flowrate of 2000 cfm ± 10%.

The provision of SR 4.0.2 and SR 4.0.3 are applicable to the VFTP test frequencies.

Enclosure, Attachment 3

CNRO2026-00013

Technical Specification Page Markups – GGNS

(1 TS Page Follows)

5.5 Programs and Manuals (continued)

5.5.7 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the periodic Frequencies in accordance with the Surveillance Frequency Control Program and the event-based frequencies specified in Regulatory Guide 1.52, Revision 2.

a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 at the system flowrate specified below ± 10%~~÷~~. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.3.

ESF Ventilation System	Flowrate
SGTS	4000 cfm
CRFA	4000 cfm

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 at the system flowrate specified below ± 10%~~÷~~. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.4.

ESF Ventilation System	Flowrate
SGTS	4000 cfm

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, 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
SGTS	0.5%	70%

(continued)

Enclosure, Attachment 4

CNRO2026-00013

Technical Specification Page Markups – RBS

(1 TS Page Follows)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the periodic Frequencies in accordance with the Surveillance Frequency Control Program and the event-based frequencies specified in Regulatory Guide 1.52, Revision 2.

a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989 at the system flowrate specified below ± 10%~~:~~. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.3.

ESF Ventilation System	Flowrate
SGTS	12,500 cfm
FBVS	10,000 cfm
CRFAS	4,000 cfm

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989 at the system flowrate specified below ± 10%~~:~~. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.4.

ESF Ventilation System	Flowrate
SGTS	12,500 cfm
FBVS	10,000 cfm
CRFAS	4,000 cfm

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, 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
SGTS	5.0%	95%
FBVS	5.0%	95%
CRFAS	1.0%	95%

(continued)

Enclosure, Attachment 5

CNRO2026-00013

Technical Specification Page Markups – WF3

(1 TS Page Follows)

6.5.10 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the periodic Frequencies in accordance with the Surveillance Frequency Control Program and the event-based frequencies specified in Regulatory Guide (RG) 1.52, Revision 2.

The required system flowrates for each of the following test requirements are as follows:

ESF Ventilation System	Flowrate
Shield Building Ventilation System	10,000 cfm
Control Room Emergency Filtration System	4,225 cfm
Controlled Ventilation Area System	3,000 cfm

a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 0.05% when tested in accordance with RG 1.52, Revision 2, and ASME N510-1975 at the required system flowrate ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.3.

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < 0.05% when tested in accordance with RG 1.52, Revision 2, and ASME N510-1975 at the required system flowrate ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.4.

c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in RG 1.52, Revision 2, shows the methyl iodide penetration less than 0.5% when tested in accordance with ASTM D3803-1989 at a temperature of 30°C (86°F) and a relative humidity of 70%.

d. Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the 7.8 inches water gauge when tested in accordance with RG 1.52, Revision 2, at the required system flowrate ± 10%.

e. Demonstrate that the heaters for each of the ESF systems dissipate the value specified below ± 10% when tested in accordance with ASME N510-1975.

ESF Ventilation System	Wattage
Shield Building Ventilation System	60 kW
Control Room Emergency Filtration System	10 kW
Controlled Ventilation Area System	20 kW

The provisions of SR 4.0.2 and SR 4.0.3 are applicable to the VFTP test frequencies.

Enclosure, Attachment 6

CNRO2026-00013

Technical Specification Pages Retyped – ANO-1

(2 TS Page Follows)

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

5.5.11 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safeguards (ES) ventilation systems filters at the periodic Frequencies in accordance with the Surveillance Frequency Control Program and the event-based frequencies specified in Regulatory Guide 1.52, Revision 2. The VFTP is applicable to the Penetration Room Ventilation System (PRVS) and the Control Room Emergency Ventilation System (CREVS).

a. Demonstrate that an inplace test of the high efficiency particulate (HEPA) filters shows:

   1. ≥ 99% removal for the PRVS when tested at the system design flowrate of 1800 scfm ± 10%; and

   2. ≥ 99.95% removal for the CREVS when tested in accordance with Regulatory Guide 1.52, Revision 2, at the system design flowrate of 2000 cfm ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.3.

b. Demonstrate that an inplace test of the charcoal adsorbers shows:

   1. ≥ 99% removal for the PRVS when tested at the system design flowrate of 1800 cfm ± 10%; and

   2. ≥ 99.95% removal for the CREVS when tested in accordance with Regulatory Guide 1.52, Revision 2, at the system design flowrate of 2000 cfm ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.4.

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

5.5.11 Ventilation Filter Testing Program (VFTP) (continued)

c. Demonstrate that a laboratory test of a sample of the charcoal adsorber meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30°C and 95% relative humidity for a methyl iodide penetration of:

1. $<$ 5% for the PRVS;

2. when obtained as described in Regulatory Guide 1.52, Revision 2, for CREVS

i. $\leq$ 2.5% for 2 inch charcoal adsorber beds; and

ii. $\leq$ 0.5% for 4 inch charcoal adsorber beds.

d. Demonstrate for the PRVS and CREVS, that the pressure drop across the combined HEPA filters, other filters in the system, and the charcoal adsorbers is < 6 inches of water when tested at the following system design flowrates $\pm$ 10%:

PRVS	1800 cfm	CREVS	2000 cfm

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

Enclosure, Attachment 7

CNRO2026-00013

Technical Specification Pages Retyped – ANO-2

(1 TS Page Follows)

6.5.11 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safeguards (ES) ventilation systems filters at the periodic Frequencies in accordance with the Surveillance Frequency Control Program and the event-based frequencies specified in Regulatory Guide 1.52, Revision 2. The VFTP is applicable to the Control Room Emergency Ventilation System (CREVS).

a. Demonstrate that an inplace test of the high efficiency particulate (HEPA) filters shows ≥ 99.95% removal when tested in accordance with Regulatory Guide 1.52, Revision 2, at the system design flowrate of 2000 cfm ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.3.

b. Demonstrate that an inplace test of the charcoal adsorbers shows ≥ 99.95% removal when tested in accordance with Regulatory Guide 1.52, Revision 2, at the system design flow rate of 2000 cfm ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.4.

c. Demonstrate that a laboratory test of a sample of the charcoal adsorber meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30 C and 95% relative humidity for a methyl iodide penetration of:

   1. ≤ 2.5% for 2 inch charcoal adsorber beds, and

   2. ≤ 0.5% for 4 inch charcoal adsorber beds,

   when obtained as described in Regulatory Guide 1.52, Revision 2.

d. Demonstrate that the pressure drop across the combined HEPA filters, other filters in the system, and charcoal adsorbers is < 6 inches of water when tested at the following system design flowrate of 2000 cfm ± 10%.

The provision of SR 4.0.2 and SR 4.0.3 are applicable to the VFTP test frequencies.

Enclosure, Attachment 8

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(1 TS Page Follows)

5.5 Programs and Manuals (continued)

5.5.7 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the periodic Frequencies in accordance with the Surveillance Frequency Control Program and the event-based frequencies specified in Regulatory Guide 1.52, Revision 2.

a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 at the system flowrate specified below ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.3.

ESF Ventilation System	Flowrate
SGTS	4000 cfm
CRFA	4000 cfm

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 at the system flowrate specified below ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.4.

ESF Ventilation System	Flowrate
SGTS	4000 cfm

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, 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
SGTS	0.5%	70%

(continued)

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Technical Specification Pages Retyped – RBS

(1 TS Page Follows)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the periodic Frequencies in accordance with the Surveillance Frequency Control Program and the event-based frequencies specified in Regulatory Guide 1.52, Revision 2.

a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989 at the system flowrate specified below ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.3.

ESF Ventilation System	Flowrate
SGTS	12,500 cfm
FBVS	10,000 cfm
CRFAS	4,000 cfm

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989 at the system flowrate specified below ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.4.

ESF Ventilation System	Flowrate
SGTS	12,500 cfm
FBVS	10,000 cfm
CRFAS	4,000 cfm

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, 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
SGTS	5.0%	95%
FBVS	5.0%	95%
CRFAS	1.0%	95%

(continued)

Enclosure, Attachment 10

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Technical Specification Pages Retyped – WF3

(1 TS Page Follows)

6.5.10 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the periodic Frequencies in accordance with the Surveillance Frequency Control Program and the event-based frequencies specified in Regulatory Guide (RG) 1.52, Revision 2.

The required system flowrates for each of the following test requirements are as follows:

ESF Ventilation System	Flowrate
Shield Building Ventilation System	10,000 cfm
Control Room Emergency Filtration System	4,225 cfm
Controlled Ventilation Area System	3,000 cfm

a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 0.05% when tested in accordance with RG 1.52, Revision 2, and ASME N510-1975 at the required system flowrate ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.3.

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < 0.05% when tested in accordance with RG 1.52, Revision 2, and ASME N510-1975 at the required system flowrate ± 10%. An alternative challenge aerosol may be used in accordance with Regulatory Guide 1.52, Revision 3, Section 6.4.

c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in RG 1.52, Revision 2, shows the methyl iodide penetration less than 0.5% when tested in accordance with ASTM D3803-1989 at a temperature of 30°C (86°F) and a relative humidity of 70%.

d. Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the 7.8 inches water gauge when tested in accordance with RG 1.52, Revision 2, at the required system flowrate ± 10%.

e. Demonstrate that the heaters for each of the ESF systems dissipate the value specified below ± 10% when tested in accordance with ASME N510-1975.

ESF Ventilation System	Wattage
Shield Building Ventilation System	60 kW
Control Room Emergency Filtration System	10 kW
Controlled Ventilation Area System	20 kW

The provisions of SR 4.0.2 and SR 4.0.3 are applicable to the VFTP test frequencies.