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November 17, 1999

Docket Nos. 50-321  
50-366



HL-5841

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Edwin I. Hatch Nuclear Plant  
Request to Revise Technical Specifications:  
Ventilation Filter Testing Program (VFTP)

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, as required by 10 CFR 59(c) (1), Southern Nuclear Operating Company hereby proposes changes to the Plant Hatch Units 1 and 2 Technical Specifications, Appendix A to operating licenses DPR-57 and NPF-5 respectively.

A revision to the methyl iodide penetration for the Main Control Room Environmental control system and the Standby Gas Treatment systems is being proposed. Also, editorial revisions are being made to some portions of Section 5.0 of the Technical Specifications to reference the correct sections of Regulatory Guide 1.52. The revision to the methyl iodide penetration is consistent with the recommendations of Generic Letter 99-02.

Enclosure 1 provides a description and justification for the proposed change. Enclosure 2 details the bases for SNC's determination that the proposed changes do not involve a significant hazards consideration. Enclosure 3 provides page change instructions for incorporating the proposed changes. Following Enclosure 3 are the revised Technical Specification pages. Enclosure 4 provides the corresponding mark-ups of the Technical Specifications pages.

In accordance with the requirements of 10 CFR 50.91, the designated state official will be sent a copy of this letter and all applicable enclosures.

Mr. H. L. Sumner, Jr. states he is Vice President of Southern Nuclear Operating Company and is authorized to execute this oath on behalf of Southern Nuclear Operating Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

*Lewis Sumner*

H. L. Sumner, Jr.

Sworn to and subscribed before me this 17<sup>th</sup> day of November 1999.

*Elaine E. Belten*  
Notary Public

Commission Expiration Date: May 25, 2003

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OCV/eb

Enclosures:

1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Page Change Instructions
4. Page Mark-Ups

cc: Southern Nuclear Operating Company

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SNC Document Management (R-Type A02.001)

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U.S. Nuclear Regulatory Commission, Region II

Mr. L. A. Reyes, Regional Administrator  
Mr. J. T. Munday, Senior Resident Inspector - Hatch

State of Georgia

Mr. L. C. Barrett, Commissioner - Department of Natural Resources

## Enclosure 1

### Edwin I. Hatch Nuclear Plant Request to Revise Technical Specifications: Ventilation Filter Testing Program (VFTP) Basis for Change Request

#### Introduction

Plant Hatch proposes to make changes to Technical Specifications Section 5.5.7. Including 5.5.7.a, b and c. The changes make editorial corrections to reference the correct sections of Regulatory Guide 1.52, Revision 2. Additionally, we are proposing to revise the Methyl Iodide penetration values for the charcoal adsorber from .2% for Standby Gas Treatment (SGTS) and 2.0% for the Main Control Room Environmental Control (MCREC) system to 2.5% for both systems.

#### Basis for Proposed Change

On June 3, 1999, the NRC issued Generic Letter (GL) 99-02, alerting licensees that testing nuclear grade activated charcoal to standards other than the American Society for Testing and Materials (ASTM) D3808-1989, "Standard Test Method for Nuclear Grade Activated Carbon," does not provide assurance for complying with a plant's current licensing basis as it relates to the dose limits of General Design Criteria (GDC) 19 of Appendix A and Subpart A of 10 CFR 100.

The GL requests that licensees respond, in writing, with respect to the testing standard under use at the respective facilities and their associated Technical Specification requirements. (The Plant Hatch response will be sent under separate letter.) Additionally, for plants not referencing the 1989 standard in their Technical Specification requirements, the GL requests that a Technical Specification change be submitted to reference the 1989 standard. Plant Hatch already tests to the 1989 standard and, as a result, no Technical Specification change is required. However, GL 99-02 allows plants that test to the 1989 standard to lower the safety factor for determining the acceptance criteria for charcoal filter efficiency. Since Plant Hatch uses the 1989 standard we would like to take advantage of the new safety factor, and, accordingly, submit this Technical Specification change for that purpose.

GL 99-02 allows relaxing the safety factor to 2 because the 1989 standard is a "...more accurate and demanding test than older tests". The GL further states that the safety factor can be used for systems with or without humidity controls because the lack of humidity control is already accounted for in the test conditions. The Hatch SGTS has humidity controls and the MCREC system does not. For the MCREC system, mixing of outside air with recirculated air ensures the relative humidity of the mixed air is below 70% which is similar to the design requirement for systems with heaters. The GL points out that the staff has previously approved reductions in safety factors for plants adopting the 1989 standard on a case by case basis.

The change to the Methyl Iodide penetration value is based on a change to the safety factor between the credited and tested carbon efficiencies from 5 (for systems with heaters) and 7 (for systems without heaters) to 2 (with or without heaters) if tested per ASTM D-3803-1989. Plant Hatch presently tests to the 1989 standard. The carbon efficiency credited in the accident analysis

Enclosure 1  
Basis for Change Request

for Plant Hatch is 95% for both units' SGTS and MCREC systems. Taking credit for this reduced safety factor, the carbon test efficiencies for both units' SGTS and the MCREC system may be changed from 99.8% to 97.5% respectively. This change will bring homogeneity to the carbon testing program for safety related filtration systems at Plant Hatch. The carbon test efficiency is calculated as follows:

$$\text{Carbon test efficiency (percentage)} = 100 - ((1 - \text{credited efficiency})/\text{safety factor}) 100 = 100 - ((1 - .95)/2)100 = 97.5.$$

Changes are also being proposed to Section 5.5.7 concerning references to certain sections in Reg. Guide 1.52. These changes are being made to correct these references and are thus, editorial in nature.

## Enclosure 2

### Edwin I. Hatch Nuclear Plant Request to Revise Technical Specifications: Ventilation Filter Testing Program (VFTP)

#### 10 CFR 50.92 Evaluation

In 10 CFR 50.92(c), the Nuclear Regulatory commission provides the following standards to be used in determining the existence of a significant hazards consideration:

... a proposed amendment to an operating facility licensed under 50.21 (b) or 50.22 for a testing facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of an accident of a new or different kind from any previously evaluated; or (3) involve a significant reduction in the margin of safety.

Southern Nuclear has reviewed the proposed license amendment request and determined its adoption does not involve a significant hazards consideration based on the following discussion:

#### Justification for Proposed Changes

1. *The proposed changes do not involve a significant increase in the probability or the consequences of a previously evaluated event.*

This proposed revision makes changes to Technical Specification (TS) Section 5.5.7, "Ventilation Filter Testing Program" (VFTP). The references to sections in the Regulatory Guide 1.52, Revision 2 for VFTP are being corrected. Additionally, the proposed revision also changes the allowable methyl iodide penetration percent for the carbon in the Standby Gas Treatment (SGT) and the Main Control Room Environmental Control (MCREC) systems when tested in accordance with ASTM D3803-1989. This is based on the values that would be derived using a factor of safety of 2 between the credited and tested carbon efficiencies. This safety factor is contained in the Generic Letter 99-02. The Generic Letter allows the reduction of the factor of safety between the credited and tested carbon efficiencies from 5 (for systems with heaters) and 7 (for systems without heaters) to 2 (for systems with or without heaters) when tested per ASTM D-3803-1989. Since the factor of safety of 2 is maintained, this change does not involve a significant increase in the probability or the consequences of a previously evaluated event. The changes in the section references to Regulatory Guide 1.52 Revision 2 for the Ventilation Filter Testing Program (VFTP) are considered to be editorial corrections.

2. *The change does not involve a significant increase in the probability of or the consequences of an event not previously analyzed.*

This proposed revision makes changes to TS Section 5.5.7, "Ventilation Filter Testing Program" (VFTP). The section references to Regulatory Guide 1.52 Revision 2 for the Ventilation Filter Testing Program (VFTP) are being corrected. The change in the allowable methyl iodide penetration percent is based on the values that would be derived using the safety factor of 2 contained in Generic Letter 99-02. The Generic Letter will reduce the factor of safety between the credited and tested carbon efficiencies from 5 (for systems with heaters) and 7 (for systems without heaters) to 2 if tested per ASTM D-3803-1989. Since the credited carbon efficiencies in the dose calculations are not being compromised, this change will not involve a significant increase in the probability of, or the consequences of an event not previously analyzed.

The changes in the section references to Reg. Guide 1.52 are editorial and thus do not significantly increase the probability of, or the consequences of a previously unanalyzed event.

3. *The change does not significantly reduce the margin safety.*

The change in the allowable methyl iodide penetration percent implements the Generic Letter's carbon efficiency safety factor of 2 between the credited and the tested carbon efficiencies. Per the generic letter, it is acceptable to use this new safety factor since the new standard is more accurate and demanding than previous ones. Therefore, the proposed revision will not significantly reduce the margin of safety. The changes in the section references for Regulatory Guide 1.52 Revision 2 are considered to be editorial corrections.

Enclosure 3

Edwin I. Hatch Nuclear Plant  
Request to Revise Technical Specifications:  
Ventilation Filter Testing Program (VFTP)

Page Change Instructions

Unit 1

<u>Page</u>	<u>Replace</u>
5.0-11	5.0-11
5.0-12	5.0-12
5.0-13	5.0-13

Unit 2

<u>Page</u>	<u>Replace</u>
5.0-11	5.0-11
5.0-12	5.0-12
5.0-13	5.0-13

5.5 Programs and Manuals (continued)

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5.5.6 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports.

- a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda are as follows:

<u>ASME Boiler and Pressure Vessel Code and Applicable Addenda Terminology for Inservice Testing Activities</u>	<u>Required Frequencies for Performing Inservice Testing Activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Yearly or annually	At least once per 366 days

- b. The provisions of SR 3.0.2 are applicable to the frequencies for performing inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

5.5.7 Ventilation Filter Testing Program (VFTP)

The VFTP will establish the required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in Regulatory Guide 1.52, Revision 2, Sections C.5.c and C.5.d and at least once per 18 months, or: 1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, 2) following painting, fire or chemical release in any ventilation zone communicating with the system, or 3) after every 720 hours of charcoal adsorber operation.

(continued)

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5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

-----NOTES-----

1. Tests and evaluations have determined the impact on the Standby Gas Treatment (SGT) System filters of certain types of painting, buffing and grinding, and welding. The use of water based paints and the performance of metal grinding, buffing, or welding are not detrimental to the charcoal filters of the SGT System, either prior to or during operation. These activities will not require surveillance of the system upon their conclusion. This applies to all types of welding conducted at Plant Hatch, and tracking of the quantity of weld material used is not necessary.
2. For testing purposes, the use of refrigerants equivalent to those specified in ASME N510-1989 is acceptable.

- a. Demonstrate for each of the ESF systems that an inplace test of the HEPA filters shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, Section C.5.c and ASME N510-1989, Section 10, at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u>Flowrate (cfm)</u>
SGT System	3000 to 4000
Main Control Room Environmental Control (MCREC) System	2250 to 2750

- 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, Section C.5.d and ASME N510-1989, Section 11, at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u>Flowrate (cfm)</u>
SGT System	3000 to 4000
MCREC System	2250 to 2750

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

- 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, Section C.6.b and ASME N510-1989, Section 15 and Appendix B, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of  $\leq 30^{\circ}\text{C}$  and greater than or equal to the relative humidity specified below.

<u>ESF Ventilation System</u>	<u>Penetration(%)</u>	<u>RH(%)</u>
SGT System	2.5	70
MCREC System	2.5	95

- 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 value specified below when tested in accordance with ASME N510-1989, Section 8.5.1, at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u><math>\Delta P</math> (inches wg)</u>	<u>Flowrate (cfm)</u>
SGT System	< 6	3000 to 4000
MCREC System	< 6	2250 to 2750

- e. Demonstrate that the heaters for the ESF system dissipate the value specified below when tested in accordance with ASME N510-1989, Section 14.5.1.

<u>ESF Ventilation System</u>	<u>Wattage (kW)</u>
SGT System	15 to 20

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

(continued)

5.5 Programs and Manuals (continued)

5.5.6 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports.

- a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda are as follows:

<u>ASME Boiler and Pressure Vessel Code and Applicable Addenda Terminology for Inservice Testing Activities</u>	<u>Required Frequencies for Performing Inservice Testing Activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Yearly or annually	At least once per 366 days

- b. The provisions of SR 3.0.2 are applicable to the frequencies for performing inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

5.5.7 Ventilation Filter Testing Program (VFTP)

The VFTP will establish the required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in Regulatory Guide 1.52, Revision 2, Sections C.5.c and C.5.d and at least once per 18 months, or: 1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, 2) following painting, fire or chemical release in any ventilation zone communicating with the system, or 3) after every 720 hours of charcoal adsorber operation.

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

-----NOTES-----

1. Tests and evaluations have determined the impact on the Standby Gas Treatment (SGT) System filters of certain types of painting, buffing and grinding, and welding. The use of water based paints and the performance of metal grinding, buffing, or welding are not detrimental to the charcoal filters of the SGT System, either prior to or during operation. These activities will not require surveillance of the system upon their conclusion. This applies to all types of welding conducted at Plant Hatch, and tracking of the quantity of weld material used is not necessary.
2. For testing purposes, the use of refrigerants equivalent to those specified in ASME N510-1989 is acceptable.

- a. Demonstrate for each of the ESF systems that an inplace test of the HEPA filters shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, Section C.5.c and ASME N510-1989, Section 10, at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u>Flowrate (cfm)</u>
SGT System	3000 to 4000
Main Control Room Environmental Control (MCREC) System	2250 to 2750

- 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, Section C.5.d and ASME N510-1989, Section 11, at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u>Flowrate (cfm)</u>
SGT System	3000 to 4000
MCREC System	2250 to 2750

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

- 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, Section C.6.b and ASME N510-1989, Section 15 and Appendix B, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of  $\leq 30^{\circ}\text{C}$  and greater than or equal to the relative humidity specified below.

<u>ESF Ventilation System</u>	<u>Penetration(%)</u>	<u>RH(%)</u>
SGT System	2.5	70
MCREC System	2.5	95

- 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 value specified below when tested in accordance with ASME N510-1989, Section 8.5.1, at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u><math>\Delta P</math>(inches wg)</u>	<u>Flowrate (cfm)</u>
SGT System	< 6	3000 to 4000
MCREC System	< 6	2250 to 2750

- e. Demonstrate that the heaters for the ESF system dissipate the value specified below when tested in accordance with ASME N510-1989, Section 14.5.1.

<u>ESF Ventilation System</u>	<u>Wattage (kW)</u>
SGT System	17 to 20

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

(continued)

Enclosure 4

Edwin I. Hatch Nuclear Plant  
Request to Revise Technical Specifications:  
Ventilation Filter Testing Program (VFTP)

Mark-Ups

5.5 Programs and Manuals (continued)

5.5.6 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports.

- a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda are as follows:

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Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Yearly or annually	At least once per 366 days

- b. The provisions of SR 3.0.2 are applicable to the frequencies for performing inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

5.5.7 Ventilation Filter Testing Program (VFTP)

The VFTP will establish the required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in Regulatory Guide 1.52, Revision 2, Section 5a, and at least once per 18 months, or: 1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, 2) following painting, fire or chemical release in any ventilation zone communicating with the system, or 3) after every 720 hours of charcoal adsorber operation.

C.5.c  
and  
C.5.d

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

-----NOTES-----

1. Tests and evaluations have determined the impact on the Standby Gas Treatment (SGT) System filters of certain types of painting, buffing and grinding, and welding. The use of water based paints and the performance of metal grinding, buffing, or welding are not detrimental to the charcoal filters of the SGT System, either prior to or during operation. These activities will not require surveillance of the system upon their conclusion. This applies to all types of welding conducted at Plant Hatch, and tracking of the quantity of weld material used is not necessary.
2. For testing purposes, the use of refrigerants equivalent to those specified in ASME N510-1989 is acceptable.

- a. Demonstrate for each of the ESF systems that an inplace test of the HEPA filters shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, Section 5e, and ASME N510-1989, Section 10, at the system flowrate specified below. C.S.C

<u>ESF Ventilation System</u>	<u>Flowrate (cfm)</u>
SGT System	3000 to 4000
Main Control Room Environmental Control (MCREC) System	2250 to 2750

- 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, Section 5d, and ASME N510-1989, Section 11, at the system flowrate specified below. C.S.d

<u>ESF Ventilation System</u>	<u>Flowrate (cfm)</u>
SGT System	3000 to 4000
MCREC System	2250 to 2750

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

- 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, Section 6b, and ASME N510-1989, Section 15 and Appendix B, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of  $\leq 30^{\circ}\text{C}$  and greater than or equal to the relative humidity specified below. C.6.b

<u>ESF Ventilation System</u>	<u>Penetration(%)</u>	<u>RH(%)</u>
SGT System	0.2 2.5	70
MCREC System	2.0 2.5	95

- 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 value specified below when tested in accordance with ASME N510-1989, Section 8.5.1, at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u><math>\Delta P</math> (inches wg)</u>	<u>Flowrate (cfm)</u>
SGT System	< 6	3000 to 4000
MCREC System	< 6	2250 to 2750

- e. Demonstrate that the heaters for the ESF system dissipate the value specified below when tested in accordance with ASME N510-1989, Section 14.5.1.

<u>ESF Ventilation System</u>	<u>Wattage (kW)</u>
SGT System	15 to 20

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

(continued)

5.5 Programs and Manuals (continued)

5.5.6 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports.

- a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda are as follows:

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Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Yearly or annually	At least once per 366 days

- b. The provisions of SR 3.0.2 are applicable to the frequencies for performing inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
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The VFTP will establish the required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in Regulatory Guide 1.52, Revision 2, Section 5a and at least once per 18 months, or: 1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, 2) following painting, fire or chemical release in any ventilation zone communicating with the system, or 3) after every 720 hours of charcoal adsorber operation.

C.S.c  
and  
C.S.d

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

-----NOTES-----

1. Tests and evaluations have determined the impact on the Standby Gas Treatment (SGT) System filters of certain types of painting, buffing and grinding, and welding. The use of water based paints and the performance of metal grinding, buffing, or welding are not detrimental to the charcoal filters of the SGT System, either prior to or during operation. These activities will not require surveillance of the system upon their conclusion. This applies to all types of welding conducted at Plant Hatch, and tracking of the quantity of weld material used is not necessary.
2. For testing purposes, the use of refrigerants equivalent to those specified in ASME N510-1989 is acceptable.

- a. Demonstrate for each of the ESF systems that an inplace test of the HEPA filters shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, Section 5c, and ASME N510-1989, Section 10, at the system flowrate specified below. C.S.c

<u>ESF Ventilation System</u>	<u>Flowrate (cfm)</u>
SGT System	3000 to 4000
Main Control Room Environmental Control (MCREC) System	2250 to 2750

- 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, Section 5d, and ASME N510-1989, Section 11, at the system flowrate specified below. C.S.d

<u>ESF Ventilation System</u>	<u>Flowrate (cfm)</u>
SGT System	3000 to 4000
MCREC System	2250 to 2750

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

- 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, Section 6b and ASME N510-1989, Section 15 and Appendix B, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of  $\leq 30^{\circ}\text{C}$  and greater than or equal to the relative humidity specified below. C.6.b

<u>ESF Ventilation System</u>	<u>Penetration(%)</u>	<u>RH(%)</u>
SGT System	<del>0.2</del> 2.5	70
MCREC System	<del>2.0</del> 2.5	95

- 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 value specified below when tested in accordance with ASME N510-1989, Section 8.5.1, at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u><math>\Delta P</math> (inches wg)</u>	<u>Flowrate (cfm)</u>
SGT System	< 6	3000 to 4000
MCREC System	< 6	2250 to 2750

- e. Demonstrate that the heaters for the ESF system dissipate the value specified below when tested in accordance with ASME N510-1989, Section 14.5.1.

<u>ESF Ventilation System</u>	<u>Wattage (kW)</u>
SGT System	17 to 20

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

(continued)