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DTE Energy



10 CFR 50.90

October 10, 2003
NRC-03-0064

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D C 20555-0001

- References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) Detroit Edison Letter to NRC, "Proposed License Amendment for the Revision of Control Room Emergency Filtration System Technical Specification Surveillance Requirements Regarding Unfiltered Inleakage," NRC-02-0072, dated September 26, 2002
- 3) Detroit Edison Letter to NRC, "Proposed License Amendment for the Implementation of Alternative Radiological Source Term Methodology," NRC-03-0007, dated February 13, 2003
- 4) Detroit Edison Letter to NRC, "Resubmittal of Proposed License Amendment for the Revision of Control Room Emergency Filtration System Technical Specification Surveillance Requirements Regarding Unfiltered Inleakage," NRC-03-0016, dated March 31, 2003

Subject: Proposed License Amendment for the Deferral of
Control Room Emergency Filtration System Technical
Specification Surveillance Requirement 3.7.3.6

Pursuant to 10 CFR 50.90, Detroit Edison proposes to amend Facility Operating License NPF-43 to permit a one-time extension of Surveillance Requirement (SR) 3.7.3.6, which requires verification that unfiltered inleakage from Control Room Emergency Filtration (CREF) system duct work outside the Control Room Envelope (CRE) is within limits. This SR is required to be performed every 36 months, and

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can be performed only when the CREF system is not required to be Operable (i.e., in MODES 4 or 5, with no operations with a potential for draining the reactor vessel (OPDRV's) and with no fuel movement of recently irradiated fuel in progress). The critical completion date, including SR 3.0.2 provision, for this SR is February 1, 2004.

Detroit Edison has been following the control room habitability issue closely over the last several years. We have monitored other utilities' Alternate Source Term (AST) and Technical Specification (TS) change submittals, and have noted their tracer gas test results. We have also followed closely the development of Generic Letter 2003-01, "Control Room Habitability". In References 2 and 4, we requested that Fermi 2 be allowed to perform a tracer gas test of the CRE in lieu of performing SR 3.7.3.6. We also proposed in Reference 3 a license amendment to revise the loss of coolant accident (LOCA) analysis using alternate source term (AST) methodology. These amendments would have allowed performance of a baseline tracer gas test of the CRE in lieu of performing SR 3.7.3.6 this one time. Detroit Edison plans to perform a tracer gas test once these amendments are approved.

It became clear in early August 2003, that our license amendment requests were not going to be approved in sufficient time to allow this substitution of the tracer gas test for SR 3.7.3.6, and we decided to request this deferral of SR 3.7.3.6. Since that time the Fermi 2 plant has experienced two short forced outages, neither of which has been of sufficient duration to allow performance of SR 3.7.3.6, which takes approximately 7 days in MODE 4 to perform. NRC approval of this proposed deferral of SR 3.7.3.6 until startup from the next refueling outage (approximately 10 to 12 months beyond the critical completion date of February 1, 2004), would preclude the need for a mid-cycle shutdown to perform SR 3.7.3.6.

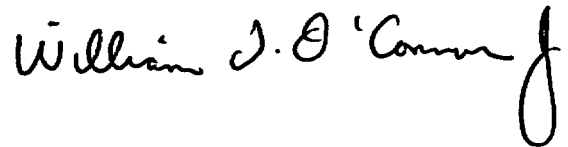
Attachment 1 provides a detailed description and an evaluation to support the requested deferral. Attachment 2 provides the evaluation performed in accordance with 10 CFR 50.92(c), which concludes that no significant hazard is involved. Attachment 3 provides a marked-up as well as a typed version of the proposed Technical Specification change.

Detroit Edison has reviewed the proposed changes against the criteria of 10 CFR 51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor do they significantly change the types or significantly increase the amounts of effluents that may be released offsite. The proposed changes do not significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, Detroit Edison concludes that the proposed changes meet the criteria provided in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement or an Environmental Assessment.

Detroit Edison requests NRC approval of this proposed license amendment by January 2, 2004, to avoid the cost of preparing for a mid-cycle outage in January 2004.

Should you have any questions or require additional information, please contact Mr. Norman K. Peterson of my staff at (734) 586-4258.

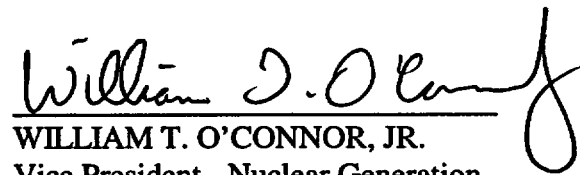
Sincerely,

A handwritten signature in cursive script, reading "William J. O'Connor". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

Attachments

cc: H. K. Chernoff
M. A. Ring
NRC Resident Office
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

I, WILLIAM T. O'CONNOR, JR., do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.


WILLIAM T. O'CONNOR, JR.
Vice President - Nuclear Generation

On this 10th day of October, 2003 before me personally appeared William T. O'Connor, Jr., being first duly sworn and says that he executed the foregoing as his free act and deed.


Notary Public

KAREN M. REED
Notary Public, Monroe County, MI
My Commission Expires 09/02/2005



**ATTACHMENT 1 TO
NRC-03-0064**

**FERMI 2 NRC DOCKET NO. 50-341
OPERATING LICENSE NO. NPF-43**

**PROPOSED LICENSE AMENDMENT TO DEFER TECHNICAL SPECIFICATION
SURVEILLANCE REQUIREMENT 3.7.3.6 REGARDING MONITORING OF
UNFILTERED INLEAKAGE FROM CONTROL ROOM EMERGENCY FILTRATION
SYSTEM DUCT WORK OUTSIDE THE CONTROL ROOM**

**DESCRIPTION AND EVALUATION
OF THE PROPOSED DEFERRAL**

DESCRIPTION AND EVALUATION OF THE PROPOSED CHANGE

A. Summary of the Proposed Change

Technical Specification (TS) 3.7.3, "Control Room Emergency Filtration (CREF) system," Surveillance Requirement (SR) 3.7.3.6, requires verifying that unfiltered inleakage from CREF system duct work outside the Control Room Envelope (CRE), that is at negative pressure during accident conditions, is within limits. This SR is required to be performed every 36 months, and can be performed only when the CREF system is not required to be Operable (i.e., in MODES 4 or 5, with no operations with a potential for draining the reactor vessel (OPDRV's) and with no fuel movement of recently irradiated fuel in progress). The critical completion date (SR Frequency plus 25%) for this SR is February 1, 2004. The next refueling outage is currently scheduled for November 2004. Detroit Edison proposes to amend Facility Operating License NPF-43 to permit a one-time extension of SR 3.7.3.6 until startup from the next refueling outage (RF-10) to preclude a mid-cycle shutdown, solely for the performance of this test.

B. Situation That Led to the Proposed Change

The recently issued Regulatory Guide (RG) 1.197 (formerly draft guide DG-1115), "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," dated May 2003, states that a Component Test does not provide an acceptable measure of the total in-leakage unless all sources of in-leakage are identified. SR 3.7.3.6 is essentially a Component Test that measures inleakage from four specific sections of duct work outside the CRE that are at negative pressure relative to the outside during accident conditions. The rest of the CRE is designed to be at a positive pressure. Anticipating future requirements regarding the use of a tracer gas test for control room in-leakage testing, and knowing the NRC's objective of obtaining the initial results of this more accurate test for each plant as soon as possible, Detroit Edison submitted a license amendment request (Reference 1) on September 26, 2002, proposing to add a Note to SR 3.7.3.6, to credit the performance of an integrated tracer gas test of the CRE, substituting the use of compensatory measures to comply with General Design Criteria 19, in lieu of satisfying the specific criteria of SR 3.7.3.6. The tracer gas test monitors dilution of a tracer gas released in the control room. This test can be performed with the plant at power; whereas, the current SR 3.7.3.6 requires isolating sections of common ductwork that are needed for TS operability of the CREF system, and can only be performed with the plant shutdown.

On February 13, 2003, Detroit Edison submitted a separate license amendment request (Reference 2) asking to revise the Fermi 2 licensing bases for the loss of coolant accident (LOCA) analysis, using alternate source term (AST) methodology. The requested licensing basis change would increase the CRE unfiltered in-leakage assumed in the accident analysis to approximately 900 cubic feet per minute (cfm); whereas, the current SR 3.7.3.6 has acceptance criteria specified in the Technical Requirements Manual (TRM) of 11 and 34 cfm (without and with damper failure, respectively).

Discussions were held with the NRC staff in telephone conversations on January 8, 2003, and on March 12, 2003 regarding the requested amendments (References 1 and 2). During these discussions, it was agreed that use of compensatory measures should be governed by a TS Action associated with a new TS Condition should CRE inleakage exceed limits. It was also agreed that implementation of the requested change should occur after the design basis CRE in-leakage limit has been changed to incorporate the AST methodology (i.e., once Reference 2 has been approved and implemented).

Detroit Edison revised the original proposed amendment (Reference 1) on March 31, 2003; that, in addition to the proposed note for crediting the tracer gas test, would have added a new Condition and associated Action to Limiting Condition for Operation (LCO) 3.7.3 to address a potential failure of SR 3.7.3.6 to meet the CRE unfiltered in-leakage limits. The proposed Action would require the initiation of immediate compensatory measures and the restoration of CRE integrity within 18 months (i.e., one operating cycle). Reference 3 also noted that the base line tracer gas test at Fermi 2 would only be performed following NRC approval of the AST license amendment. The revised AST analysis demonstrates compliance with 10 CFR 50.67 assuming a significant increase in CRE unfiltered inleakage limits. NRC approval of the AST methodology for Fermi 2 would permit revising the acceptance criteria for CRE unfiltered inleakage.

The NRC issued Generic Letter (GL) 2003-01, "Control Room Habitability," (Reference 4) on June 12, 2003, requesting licensees to provide information confirming that the control rooms at their facilities meet the applicable regulatory requirements for control room habitability, and that the control room habitability systems are designed, constructed, configured, operated, and maintained in accordance with the facility's design and licensing bases. Detroit Edison provided a 60-day response to the GL (Reference 5). As stated in our response, it is our intent to perform a tracer gas test of the CRE after we receive NRC approval of our request for a revised source term using AST methodology (Reference 2, as supplemented by Reference 6).

Detroit Edison has been following the control room habitability issue closely over the last several years. We have monitored other utilities' AST and TS change submittals, and have noted their tracer gas test results. We have also followed closely the development of Generic Letter 2003-01. Detroit Edison believed that our proposed license amendment requests would be granted in sufficient time to allow substitution of tracer gas testing of the CRE for SR 3.7.3.6 prior to its critical completion date. Therefore, SR 3.7.3.6 was not performed during RF-09.

It became clear in early August 2003, that our license amendment requests were not going to be approved in sufficient time to allow this substitution of the tracer gas test for SR 3.7.3.6, and we decided to request this deferral of SR 3.7.3.6. Since that time the Fermi 2 plant has experienced two short forced outages, neither of which has been of sufficient duration to allow performance of SR 3.7.3.6, which takes approximately 7 days in MODE 4 to perform. NRC approval of this proposed deferral of SR 3.7.3.6 until startup from the next refueling outage (approximately 10 to

12 months beyond the critical completion date of February 1, 2004), would preclude the need for a mid-cycle shutdown solely to perform SR 3.7.3.6.

SR 3.7.3.6 was last performed on April 27, 2000; therefore, based on the 36-month required frequency, it became due on April 27, 2003. However, with the 25% allowance provided by SR 3.0.2, the surveillance requirement will be met if performed no later than February 1, 2004. NRC approval of this proposed deferral of SR 3.7.3.6 until startup from the next refueling outage (RF-10), which is scheduled to begin in November 2004, would preclude the need for a mid-cycle shutdown to perform SR 3.7.3.6. This would amount to a deferral of approximately 10 to 12 months beyond the critical completion date of February 1, 2004.

C. Basis for the Current Requirement

The TS Bases for SR 3.7.3.6 state that the "SR verifies that the accident analysis assumptions concerning leakage in through CREF system duct work outside the control room envelope that would be under negative pressure (less than atmospheric) during accident conditions and where any inleakage would not be filtered are maintained. This test is needed since the CREF system duct work seams have had silicone sealant applied. Since the underlying welds have not been leak tested without silicone sealant and the qualities of the silicone sealant have not been demonstrated over time, a periodic program of verifying the integrity of these sections of duct is required. Since the accident analyses assume a single damper failure, the test pressures must account for the worst case negative pressure in each duct of concern. The SR Frequency is based upon the long-term nature of the concern and the additional assurance that the condition of the silicone is not changing provided by the annual inspection of the accessible duct work required by SR 3.7.3.3."

SR 3.7.3.6 was introduced into the TS by License Amendment No. 88, issued on October 15, 1992. This amendment deleted license condition 2.C.(7) which was included in the Fermi 2 operating license during the original licensing of the plant. This license condition resulted from NRC concerns regarding the use of silicone sealant material to seal the joints on the CREF duct work outside the control room. A periodic visual inspection of silicone sealant on accessible portions of CREF system ductwork outside the control room that are at negative pressure during accident conditions (SR 3.7.3.3) was also added by License Amendment No. 88. The qualified life of the silicone sealant is specified as 40 years. Based on this 12 month Frequency for visually inspecting the silicone sealant (SR 3.7.3.3), and considering both the qualified life of the silicone sealant (40 years), and the difficulty in obtaining the plant conditions necessary to perform the test (i.e., shutdown for several days), a frequency of every other refueling outage (36 months) was chosen for performing SR 3.7.3.6.

In addition to these two current surveillance requirements for verifying CRE integrity, SR 3.7.3.5 requires verifying that each CREF subsystem can maintain a positive pressure of greater than or equal to 0.125 inches water gauge relative to the outside during the recirculation mode of operation at a makeup flow rate of less than or equal to 1800 cfm.

Section 3.7.2 of the Technical Requirements Manual (TRM) provides additional detail regarding the requirements of SR 3.7.3.6. TRM Table TR 3.7.2-2 specifies four sections of control room duct work outside the CRE that are required to be tested under this surveillance. The Table further provides the acceptance criteria for the cumulative total inleakage for all four ducts under two scenarios correlating to the limiting design basis accident analysis. The first scenario requires testing under maximum negative pressure expected for each specific duct during operation in the recirculation mode with no damper failure. The second scenario assumes a single damper failure. The acceptance criteria provided for the two test scenarios are 11 cfm and 34 cfm, respectively. The 11 and 34 cfm values are derived from the unfiltered inleakage assumed in the current control room dose analysis used to demonstrate compliance with 10 CFR 50, Appendix A, General Design Criterion (GDC) 19 following a Loss of Coolant Accident (LOCA).

D. Evaluation of the Deferral of the Current Requirement

The CREF system provides a radiologically controlled environment from which the plant can be safely operated following a radiological accident. Upon sensing conditions that could result in radiation exposure to control room personnel, the system automatically switches to the recirculation mode of operation to prevent infiltration of contaminated air into the control room. SR 3.7.3.6 is intended to verify maintenance of the accident analysis assumptions concerning unfiltered inleakage through the CREF system duct work outside the CRE that would be under negative pressure during accident conditions. The acceptance criteria for the cumulative total inleakage for all four ducts affected by this SR, under the two limiting scenarios for the design basis accident analyses, are 11 and 34 cfm, respectively. SR 3.7.3.6 has been performed three times for credit since it was added to the TS in 1992. The results of these three tests are as follows:

Test Date or Acceptance Criteria	Leak Rate (cfm) No Damper Failure	Leak Rate (cfm) Single Damper Failure
July 1994	3.92	10.91
October 1997	6.49	13.56
April 2000	5.82	13.43
Acceptance Criteria	11.00	34.00

As can be seen from the data, SR 3.7.3.6 has been performed successfully every time, with considerable margin to the acceptance criteria.

In addition to the successful SR 3.7.3.6 test results noted above, Detroit Edison would continue to perform the two other surveillance tests at their normal frequency that are targeted at

identifying degradation in the integrity of the control room boundary. The first is SR 3.7.3.3, which is performed every 12 months. Per the Fermi 2 Technical Specification Bases, "This SR verifies that the silicone sealant applied to CREF system duct work outside of the CRE has not degraded. The duct work of concern received a general coating of sealant on the duct seams. This SR includes a visual inspection for cracking, debonding, and other abnormal degradation of the applied silicone sealant. Such degradation could be indicative of lack of duct integrity." The Bases also state that "Degradation of the silicone sealant does not necessarily indicate that the CREF system is inoperable. However, the condition must be promptly investigated and resolved. The 12 month Frequency is based on experience that shows the condition of the silicone does not change appreciably over this time period." The results of this SR to date have been very good, with only one silicone inspection noted as unsatisfactory (very small areas showing signs of poor application technique from the original application, Reference 7) since SR 3.7.3.3 was added to the TS in 1992. Since that time, all inspections have shown satisfactory results, with no noticeable degradation in sealant quality. The next scheduled performance of this surveillance is November 25, 2003. The most recent test was performed on November 27, 2002. There has been no sign of general degradation of the silicone sealant since it was first applied, and no repairs have been necessary except for those described in Reference 7.

The other surveillance currently performed to verify CRE integrity is SR 3.7.3.5, which is performed at a frequency of 18 months on a staggered test basis. Again, as stated in the Bases, "This SR verifies the integrity of the control room enclosure and the assumed inleakage rates of potentially contaminated air. The control room positive pressure, with respect to potentially contaminated adjacent areas, is periodically tested to verify proper function of the CREF system. During the emergency mode of operation, the CREF system is designed to slightly pressurize the control room to 0.125 inches water gauge positive pressure with respect to the atmosphere outside of the control room to prevent unfiltered inleakage. The CREF system is designed to maintain this positive pressure with a makeup flow rate of less than 1800 cfm to the control room in the recirculation mode. The frequency of 18 months on a staggered test basis is consistent with industry practice and with other filtration system SRs. The results of this SR to date have also been very good, with the most recent results recorded on April 30, 2003, as 1419 cfm, a 21% margin to the acceptance criteria of 1800 cfm. The next scheduled performance of SR 3.7.3.5 is during RF-10.

The three SRs described above comprise the current TS requirements for verification of CRE integrity. However, the NRC has indicated its position that positive pressure testing (such as SR 3.7.3.5), and component testing (such as SRs 3.7.3.3 and 3.7.3.6) may not be sufficient to demonstrate integrity of the CRE. The NRC and the industry have been working together for several years to develop better guidance to address Control Room Habitability (CRH) concerns, including development of improved testing methods to demonstrate the ability of control room designs to meet GDC 19. This effort has culminated in the NRC issuing Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," dated May 2003 and Generic Letter 2003-01, "Control Room Habitability," dated June 12, 2003. These documents note that the current methods for demonstrating CRE integrity may not be adequate, and recommend an integrated CRE inleakage test (such as a tracer gas test). As previously

described, Detroit Edison has been actively pursuing license changes which will enable us to perform an integrated inleakage test.

Based on the results of our previous surveillance testing, and until Fermi 2 is able to perform a tracer gas test of the CRE, the continued performance of SR 3.7.3.3 and 3.7.3.5 on their normal schedule, the delay in performing SR 3.7.3.6 by approximately 10 to 12 months is not expected to result in any significant undetected degradation in performance of the affected ductwork. Additionally, it is expected that a tracer gas test of the Fermi 2 CRE will be performed upon NRC approval of our AST submittal. Therefore, we do not expect any significant undetected degradation in CRE integrity would result from deferral of SR 3.7.3.6.

References:

1. Detroit Edison Letter to NRC, "Proposed License Amendment for the Revision of Control Room Emergency Filtration System Technical Specification Surveillance Requirements Regarding Unfiltered Inleakage," NRC-02-0072, dated September 26, 2002
2. Detroit Edison Letter to NRC, "Proposed License Amendment for the Implementation of Alternative Radiological Source Term Methodology," NRC-03-0007, dated February 13, 2003
3. Detroit Edison Letter to NRC, "Resubmittal of Proposed License Amendment for the Revision of Control Room Emergency Filtration System Technical Specification Surveillance Requirements Regarding Unfiltered Inleakage," NRC-03-0016, dated March 31, 2003
4. Detroit Edison Letter to NRC, "Response to NRC Request for Additional Information Regarding the Implementation of Alternative Source Term," NRC-03-0053, dated July 8, 2003
5. NRC Generic Letter No. 2003-01, "Control Room Habitability," dated June 12, 2003
6. Detroit Edison Letter to NRC, "Detroit Edison's 60-Day Response to Generic letter 2003-01, Control Room Habitability," dated August 11, 2003
7. Detroit Edison Letter to NRC, "Special Report of Debonded and Damaged Control Center Heating, Ventilation, and Air Conditioning (CCHVAC) Duct Sealant," dated January 23, 1996

**ATTACHMENT 2 TO
NRC-03-0064**

**FERMI 2 NRC DOCKET NO. 50-341
OPERATING LICENSE NO. NPF-43**

**PROPOSED LICENSE AMENDMENT TO DEFER TECHNICAL SPECIFICATION
SURVEILLANCE REQUIREMENT 3.7.3.6 REGARDING MONITORING OF
UNFILTERED INLEAKAGE FROM CONTROL ROOM EMERGENCY FILTRATION
SYSTEM DUCT WORK OUTSIDE THE CONTROL ROOM**

10 CFR 50.92 SIGNIFICANT HAZARDS CONSIDERATION

10 CFR 50.92 SIGNIFICANT HAZARDS CONSIDERATION

In accordance with 10 CFR 50.92, Detroit Edison has made a determination that the proposed amendment involves no significant hazards consideration. The proposed revision to allow a one-time extension of SR 3.7.3.6 until startup from the next refueling outage (approximately 10 to 12 months beyond its critical due date), do not involve a significant hazards consideration for the following reasons:

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

The proposed change allows a one-time extension of SR 3.7.3.6 until startup from the next refueling outage (approximately 10 to 12 months beyond its critical completion date). The Control Room Emergency Filtration (CREF) system provides a configuration for mitigating radiological consequences of accidents; however, it is not considered an initiator of any previously analyzed accident. Therefore, the proposed change cannot increase the probability of any previously evaluated accident.

The CREF system provides a radiologically controlled environment from which the plant can be safely operated following a radiological accident. The current TS surveillance (SR 3.7.3.6) measures inleakage from four sections of CREF system duct work outside the Control Room Envelope (CRE) that are at negative pressure during accident conditions. Based on the results of previous surveillance testing, and the continued performance of SR 3.7.3.3 and 3.7.3.5 on their normal schedule, the delay in performing SR 3.7.3.6 by approximately 10 to 12 months will provide essentially the same degree of assurance that CRE integrity is being maintained as before. It is expected that CRE integrity will remain essentially unchanged from what it is today. Therefore, the proposed change does not significantly increase the radiological consequences of any previously analyzed accident.

Based on the above, the proposed change does not significantly increase the probability or consequences of any accident previously evaluated.

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

The proposed change to allow a one-time extension of SR 3.7.3.6 until startup from the next refueling outage (approximately 10 to 12 months beyond its critical completion date) does not alter the design or function of the system involved, nor does it introduce any new modes of plant or CREF system operation. Therefore, the proposed change does not create the potential for a new or different kind of accident from any accident previously evaluated.

3. The proposed change does not involve a significant reduction in the margin of safety.

The proposed change to allow a one-time extension of SR 3.7.3.6 until startup from the next refueling outage (approximately 10 to 12 months beyond its critical completion date) will not affect the radiological release from a design basis accident. Based on the results of previous surveillance testing and the continued performance of SR 3.7.3.3 and 3.7.3.5 on their normal schedule, the delay in performing SR 3.7.3.6 by approximately 10 to 12 months will provide essentially the same degree of assurance that CRE integrity is being maintained as existed before; and, the postulated dose to the control room occupants as a result of an accident will remain approximately the same. Therefore, the proposed changes will not result in a significant reduction in the margin of safety.

Based on the above, Detroit Edison has determined that the proposed license amendment does not involve a significant hazards consideration.

**ATTACHMENT 3 TO
NRC-03-0064**

**FERMI 2 NRC DOCKET NO. 50-341
OPERATING LICENSE NO. NPF-43**

**PROPOSED LICENSE AMENDMENT TO DEFER TECHNICAL SPECIFICATION
SURVEILLANCE REQUIREMENT 3.7.3.6 REGARDING MONITORING OF
UNFILTERED INLEAKAGE FROM CONTROL ROOM EMERGENCY FILTRATION
SYSTEM DUCT WORK OUTSIDE THE CONTROL ROOM**

MARKUP AND TYPED COPIES OF THE PROPOSED DEFERRAL

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.7.3.5 Verify each CREF subsystem can maintain a positive pressure of ≥ 0.125 inches water gauge relative to the outside atmosphere during the recirculation mode of operation at a makeup flow rate of ≤ 1800 cfm.	18 months on a STAGGERED TEST BASIS
SR 3.7.3.6 Verify that unfiltered inleakage from CREF system duct work outside the Control Room envelope that is at negative pressure during accident conditions is within limits.	36 months [#]

PLEASE ADD:

[#] This surveillance requirement may be extended on a one-time basis to prior to startup from RF-10.

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.7.3.5 Verify each CREF subsystem can maintain a positive pressure of ≥ 0.125 inches water gauge relative to the outside atmosphere during the recirculation mode of operation at a makeup flow rate of ≤ 1800 cfm.	18 months on a STAGGERED TEST BASIS
SR 3.7.3.6 Verify that unfiltered inleakage from CREF system duct work outside the Control Room envelope that is at negative pressure during accident conditions is within limits.	36 months [#]

[#] This surveillance requirement may be extended on a one-time basis to prior to startup from RF-10.