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August 16, 2007

U. S. Nuclear Regulatory Commission  
Washington, DC 20555

**ATTENTION:** Document Control Desk

**SUBJECT:** **R.E. Ginna Nuclear Power Plant**  
Docket No. 50-244

Application to Revise Technical Specifications Regarding Control Room  
Envelope Habitability in Accordance With TSTF-448, Revision 3, Using the  
Consolidated Line Item Improvement Process

In accordance with the provisions of 10 CFR 50.90, R.E. Ginna Nuclear Power Plant, LLC (Ginna LLC) is submitting a request for an amendment to the Ginna Technical Specifications. The proposed amendment would modify TS requirements related to control room envelope habitability in accordance with TSTF-448, Revision 3.

Attachment 1 provides a description of the proposed changes, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the existing TS pages marked up to show the proposed changes. Attachment 3 provides revised (clean) TS pages. Attachment 4 provides existing TS Bases pages marked up to show the proposed changes.

Ginna LLC requests approval of the proposed License Amendment by September 1, 2008, with the amendment being implemented within 60 days of issuance.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated New York State official.

If you should you have any questions regarding this submittal, please contact Mr. Brian Weaver at (585) 771-5219 or [Brian.Weaver@Constellation.com](mailto:Brian.Weaver@Constellation.com).

Sincerely,  
A handwritten signature in black ink, appearing to read "John T. Carlin".  
John T. Carlin

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A102  
NRK

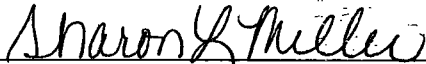
STATE OF NEW YORK :  
: TO WIT:  
COUNTY OF WAYNE :

I, John T. Carlin, begin duly sworn, state that I am Vice President, R.E. Ginna Nuclear Power Plant, LLC (Ginna LLC), and that I am duly authorized to execute and file this request on behalf of Ginna LLC. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other Ginna LLC employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.



Subscribed and sworn before me, a Notary Public in and for the State of New York and County of Seneca New York this 16 day of August, 2007.

WITNESS my Hand and Notarial Seal:

  
Notary Public

My Commission Expires:

12-21-10  
Date

SHARON L. MILLER  
Notary Public, State of New York  
Registration No. 01MI6017755  
Monroe County  
Commission Expires December 21, 2010

JC/MR

- Attachments:
1. Description and Assessment
  2. Proposed Technical Specification Changes (Mark-Up)
  3. Revised Technical Specification Pages
  4. Proposed Technical Specification Bases Changes (Mark-Up)

cc: S. J. Collins, NRC  
D.V. Pickett, NRC  
Resident Inspector, NRC (Ginna)  
P.D. Eddy, NYSDPS  
J. P. Spath, NYSERDA

## **Attachment 1**

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### **Description and Assessment**

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## Attachment 1

### Description and Assessment

#### 1. Description

The proposed amendment would modify Technical Specifications (TS) requirements related to control room envelope habitability in TS 3.7.9, "Control Room Emergency Air Treatment System (CREATS)" and TS Section 5.5, "Programs and Manuals."

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical specification Task Force (TSTF) STS change TSTF-448 Revision 3. The availability of this TS improvement was published in the Federal Register on January 17, 2007 as part of the consolidated line item improvement process (CLIIP).

#### 2. Assessment

##### 2.1 *Applicability of Published Safety Evaluation*

Ginna LLC has reviewed the safety evaluation dated January 9, 2007 as part of the CLIIP. This review included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-448. Ginna LLC has concluded that the justifications presented in the TSTF proposal and the safety evaluation, prepared by the NRC staff, are applicable to Ginna and justify this amendment for incorporation of the changes to the Ginna TS.

##### 2.2 *Optional Changes and Variations*

Ginna LLC is not proposing any variations or deviations from the TS changes described in the TSTF-448, Revision 3, or the applicable parts of the NRC staff's model safety evaluation dated January 9, 2007, with the exception of the following:

As stated in the TSTF justification, "...the ISTS CREFS requirements are based on a positive pressure CRE design. Since this Traveler proposes changes to the ISTS, the information provided only addresses positive pressure control rooms. These changes may or may not be applicable to plants with differing designs." As part of TSTF-448 the requirement to perform a positive pressure test was removed from Standard TS SR 3.7.10.4, and a positive pressure test was added to section 5.5.18.d as a periodic assessment of control room envelope (CRE) boundary health. Ginna's current TS do not include a positive pressure test because Ginna's neutral pressure design (isolation and recirculation only) does not provide the positive pressure mode of operation necessary to perform a meaningful pressure test. Because Ginna's current TS and licensing basis do not contain the requirement for this type of test, and because a meaningful pressure test cannot be performed given the system design, new section 5.5.18.d of TSTF-448 is not included in this submittal. TSTF-448 Section 5.5.18.f (proposed Ginna TS Section 5.5.16.e) is also modified to reflect the removal of 5.5.18.d.

Proposed license condition 2.3(c) of the model license amendment request is not included to reflect the removal of 5.5.18.d.

Section 2.2 of the model safety evaluation lists the components required to be operable for a CREATS train to be considered operable. Ginna does not credit humidity control in the charcoal filter efficiency assumptions. The installed heaters function only for comfort and climate control. Additionally, Ginna's CREATS system is not designed with demisters. Therefore, heaters and demisters are not required for CREATS operability.

The TS Bases are controlled by Ginna LLC under TS 5.5.13, Technical Specification Bases Control Program, but are included for information and review in this submittal (Attachment 4) as indicated in the model license amendment request. Where appropriate, the Bases changes indicated in TSTF-448 were included. However, TSTF-448 requirements are based on a positive pressure design and do not necessarily reflect Ginna's neutral pressure configuration and other design characteristics. In other cases such as design details of the filter systems, the Ginna TS Bases did not match the Standard TS Bases prior to the issuance of TSTF-448. Where the Ginna design and licensing basis was not reflected in the TSTF-448 Bases the appropriate information was maintained in the Ginna Bases. Additionally, the level of detail included in the Ginna Bases exceeds that contained in the Standard TS bases in some cases, and Ginna has elected to maintain that detail for the benefit of operations. An example of this is the identification of specific dampers and their requirements in the BACKGROUND and LCO sections. Given the differences in design and licensing basis, Ginna has captured the elements of the TSTF-448 Bases necessary to implement the new TS as intended.

Section 3.3, Evaluations 2 and 4 of the model safety evaluation are applicable to Ginna.

### *2.3 License Condition Regarding Initial Performance of New Surveillance and Assessment Requirements*

Ginna LLC proposes the following as a license condition to support implementation of the proposed TS changes:

Upon implementation of Amendment No. [ ] adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.9.4, in accordance with TS 5.5.16.c.i and the assessment of CRE habitability as required by 5.5.16.c.ii, shall be considered met. Following implementation:

(a) The first performance of SR 3.7.9.4 in accordance with Specification 5.5.16.i shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from February 8, 2005, the date of the most recent successful tracer gas test, as stated in the April 6, 2007 letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent tracer gas test is greater than 6 years.

(b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.16.c.ii, shall be within 3 years, plus the 9-month allowance of SR 3.0.2 as measured from

February 8, 2005, the date of the most recent successful tracer gas test, as stated in the April 6, 2007 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.

### **3.0 Regulatory Analysis**

#### *3.1 No Significant Hazards Consideration Determination*

Ginna LLC has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register as part of the CLIIP. Ginna LLC has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to Ginna and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

#### *3.2 Commitments*

Ginna, LLC has made no commitments in support of this application.

### **4.0 Environmental Evaluation**

Ginna LLC has reviewed the environmental evaluation included in the model safety evaluation dated January 9, 2007 as part of the CLIIP. Ginna LLC has concluded that the staff's findings presented in that evaluation are applicable to Ginna and the evaluation is hereby incorporated by reference for this application.

## **Attachment 2**

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### **Proposed Technical Specification Changes (Mark-UP)**

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3.7 PLANT SYSTEMS

3.7.9 Control Room Emergency Air Treatment System (CREATS)

LCO 3.7.9

Two CREATS Trains shall be OPERABLE.

Insert ① →

APPLICABILITY:

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

for reasons other than Condition B,

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CREATS train inoperable	A.1 Restore CREATS train to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met in MODE 1, 2, 3, or 4.	<del>A.1</del> Be in MODE 3. AND C B.2 Be in MODE 5.	6 hours 36 hours
C. Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies.	<del>C.1</del> <del>D.2</del> D.1 Place OPERABLE CREATS Train in emergency mode OR	Immediately Immediately
D. Two CREATS trains inoperable in MODE 1, 2, 3, or 4	<del>D.1</del> F.1 Enter LCO 3.0.3.	Immediately
E. Two CREATS trains inoperable during movement of irradiated fuel assemblies.	E.1 Suspend movement of irradiated fuel assemblies.	Immediately

for reasons other than Condition B,

OR  
ONE or more CREATS  
trains inoperable due to  
an inoperable CRE boundary  
during movement of irradiated  
fuel assemblies



SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.9.1	Operate each CREATS filtration train $\geq 15$ minutes.	31 days
SR 3.7.9.2	Perform required CREATS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with VFTP
SR 3.7.9.3	Verify each CREATS train actuates on an actual or simulated actuation signal.	24 months

3.7.9.4

Perform required CRE unfiltered air leakage testing in accordance with the Control Room Envelope Habitability Program

In accordance with the Control Room Envelope Habitability Program

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

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The following programs and manuals shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

The ODCM shall contain:

- a. The methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The radioactive effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports.

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  - 1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s),
  - 2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and does not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after review and acceptance by the onsite review function and the approval of the plant manager; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment Program

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. The systems include Containment Spray, Safety Injection, and Residual Heat Removal in the recirculation configuration. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.5.3 Deleted

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in 10 CFR 20, Appendix B, Table 2, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from the plant to unrestricted areas, conforming to 10 CFR 50, Appendix I and 40 CFR 141;
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;

- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;
- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary conforming to the dose associated with 10 CFR 20, Appendix B, Table 2, Column 1;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from the plant to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from the plant to areas beyond the site boundary, conforming to 10 CFR-50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

## 5.5.5

Component Cyclic or Transient Limit Program

This program provides controls to track the reactor coolant system cyclic and transient occurrences specified in UFSAR Table 5.1-4 to ensure that components are maintained within the design limits.

## 5.5.6

Pre-Stressed Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with Regulatory Guide 1.35, Revision 2.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5.7

Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports. The program shall include the following:

- a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda 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
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

- b. The provisions of SR 3.0.2 are applicable to the above required 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.

5.5.8

Steam Generator (SG) Program

A Steam Generator Program shall be established and implemented to ensure that SG tube integrity is maintained. In addition, the Steam Generator Program shall include the following provisions:

- a. Provisions for condition monitoring assessments. Condition monitoring assessment means an evaluation of the "as found" condition of the tubing with respect to the performance criteria for structural integrity and accident induced leakage. The "as found" condition refers to the condition of the tubing during an SG inspection outage, as determined from the inservice inspection

results or by other means, prior to the plugging of tubes. Condition monitoring assessments shall be conducted during each outage during which the SG tubes are inspected or plugged, to confirm that the performance criteria are being met.

- b. Performance criteria for SG tube integrity. Steam generator tube integrity shall be maintained by meeting the performance criteria for tube structural integrity, accident induced leakage, and operational LEAKAGE.
  - 1. Structural integrity performance criterion: All in-service steam generator tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cool down and all anticipated transients included in the design specification) and design basis accidents. This includes retaining a safety factor of 3.0 against burst under normal steady-state full power operation primary to secondary pressure differential and a safety factor of 1.4 against burst applied to the design basis accident primary-to-secondary pressure differentials. Apart from the above requirements, additional loading conditions associated with the design basis accidents, or combination of accidents in accordance with the design and licensing basis, shall also be evaluated to determine if the associated loads contribute significantly to burst or collapse. In the assessment of tube integrity, those loads that do significantly affect burst or collapse shall be determined and assessed in combination with the loads due to pressure with a safety factor of 1.2 on the combined primary loads and 1.0 on axial secondary loads.
  - 2. Accident induced leakage performance criterion: The primary to secondary accident induced leakage rate for any design basis accident, other than a SG tube rupture, shall not exceed the leakage rate assumed in the accident analysis in terms of total leakage rate for each SG. Leakage is not to exceed 1 gpm per SG.
  - 3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."
- c. Provisions for SG tube repair criteria. Tubes found by inservice inspection to contain flaws with a depth equal to or exceeding 40% of the nominal tube wall thickness shall be plugged.
- d. Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. The number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial, and circumferential cracks) that may be present along the length of

the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube repair criteria. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 below, the inspection scope, inspection methods, and inspection intervals shall be such as to ensure that SG tube integrity is maintained until the next SG inspection. An assessment of degradation shall be performed to determine the type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.

1. Inspect 100% of the tubes in each SG during the first refueling outage following SG replacement.
  2. Inspect 100% of the tubes at sequential periods of 144, 108, 72, and, thereafter, 60 effective full power months. The first sequential period shall be considered to begin after the first inservice inspection of the SGs. In addition, inspect 50% of the tubes by the refueling outage nearest the midpoint of the period and the remaining 50% by the refueling outage nearest the end of the period. No SG shall operate for more than 72 effective full power months or three refueling outages (whichever is less) without being inspected.
  3. If crack indications are found in any SG tube, then the next inspection for each SG for the degradation mechanism that caused the crack indication shall not exceed 24 effective full power months or one refueling outage (whichever is less). If definitive information, such as from examination of a pulled tube, diagnostic non-destructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.
- e. Provisions for monitoring operational primary to secondary LEAKAGE.

#### 5.5.9

##### Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation. This program shall include:

- a. Identification of a sampling schedule for the critical variables and control points for these variables;
- b. Identification of the procedures used to measure the values of the critical variables;

- c. Identification of process sampling points;
- d. Procedures for the recording and management of data;
- e. Procedures defining corrective actions for all off control point chemistry conditions; and
- f. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events, which is required to initiate corrective action.

5.5.10

Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature filter ventilation systems and the Spent Fuel Pool (SFP) Charcoal Adsorber System. The test frequencies will be in accordance with Regulatory Guide 1.52, Revision 2, except that in lieu of 18 month test intervals, a 24 month interval will be implemented. The test methods will be in accordance with Regulatory Guide 1.52, Revision 2, except as modified below.

- a. Containment Recirculation Fan Cooler System
  - 1. Demonstrate the pressure drop across the high efficiency particulate air (HEPA) filter bank is < 3 inches of water at a design flow rate ( $\pm 10\%$ ).
  - 2. Demonstrate that an in-place dioctylphthalate (DOP) test of the HEPA filter bank shows a penetration and system bypass < 1.0%.
- b. Control Room Emergency Air Treatment System (CREATS)
  - 1. Demonstrate the pressure drop across the combined HEPA filters, the prefilters, the charcoal adsorbers and the post-filters is < 11 inches of water at a design flow rate ( $\pm 10\%$ ).
  - 2. Demonstrate that an in-place DOP test of the HEPA filter bank shows a penetration and system bypass < 0.05%.
  - 3. Demonstrate that an in-place Freon test of the charcoal adsorber bank shows a penetration and system bypass < 0.05%, when tested under ambient conditions.



4. Demonstrate that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows a methyl iodide penetration of less than 1.5% when tested in accordance with ASTM D3803-1989 at a test temperature of 30°C (86°F), a relative humidity of 95%, and a face velocity of 61 ft/min.
- c. SFP Charcoal Adsorber System
1. Demonstrate that the total air flow rate from the charcoal adsorbers shows at least 75% of that measured with a complete set of new adsorbers.
  2. Demonstrate that an in-place Freon test of the charcoal adsorbers bank shows a penetration and system bypass < 1.0%, when tested under ambient conditions.
  3. Demonstrate that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows a methyl iodide penetration of less than 14.5% when tested in accordance with ASTM D3803-1989 at a test temperature of 30°C (86°F) and a relative humidity of 95%.

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

#### 5.5.11

##### Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the waste gas decay tanks and the quantity of radioactivity contained in waste gas decay tanks. The gaseous radioactivity quantities shall be determined following the methodology in NUREG-0133.

The program shall include:

- a. The limits for concentrations of hydrogen and oxygen in the waste gas decay tanks and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion); and

- b. A surveillance program to ensure that the quantity of radioactivity contained in each waste gas decay tank is less than the amount that would result in a whole body exposure of  $\geq 0.5$  rem to any individual in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

#### 5.5.12

##### Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

- a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
  - 1. an API gravity or an absolute specific gravity within limits,
  - 2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and
  - 3. a clear and bright appearance with proper color or a water and sediment content within limits; and
- b. Within 31 days following addition of the new fuel to the storage tanks, verify that the properties of the new fuel oil, other than those addressed in a. above, are within limits for ASTM 2D fuel oil; and
- c. Total particulate concentration of the fuel oil is  $\leq 10$  mg/l when tested every 92 days.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies.

#### 5.5.13

##### Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
  - 1. A change in the TS incorporated in the license; or
  - 2. A change to the UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criteria of Specification 5.5.13.b.1 or Specification 5.5.13.b.2 shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71e.

## 5.5.14

Safety Function Determination Program (SFDP)

This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate actions may be taken as a result of the support system inoperability and corresponding exception to entering supported system Condition and Required Actions. This program implements the requirements of LCO 3.0.6. The SFDP shall contain the following:

- a. Provisions for cross train checks to ensure a loss of the capability to perform the safety function assumed in the accident analysis does not go undetected;
- b. Provisions for ensuring the plant is maintained in a safe condition if a loss of function condition exists;
- c. Provisions to ensure that an inoperable supported system's Completion Time is not inappropriately extended as a result of multiple support system inoperabilities; and
- d. Other appropriate limitations and remedial or compensatory actions.

A loss of safety function exists when, assuming no concurrent single failure, a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:

- a. A required system redundant to the supported system(s) is also inoperable; or

- b. A required system redundant to the system(s) in turn supported by the inoperable supported system is also inoperable; or
- c. A required system redundant to the inoperable support system(s) for the supported systems (a) and (b) above is also inoperable.

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

#### 5.5.15

##### Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995, as modified by the following exception to NEI 94-01, Rev. 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50, Appendix J":

- a. Section 9.2.3: The first Type A test performed after the May 31, 1996 Type A test shall be performed by May 31, 2011.

The peak calculated containment internal pressure for the design basis loss of coolant accident,  $P_a$ , is 60 psig.

The maximum allowable primary containment leakage rate,  $L_a$ , at  $P_a$ , shall be 0.2% of containment air weight per day.

Leakage Rate acceptance criteria are:

- a. Containment leakage rate acceptance criterion is  $\leq 1.0 L_a$ . During the first plant startup following testing in accordance with this program, the leakage rate acceptance criteria are  $\leq 0.60 L_a$  for the Type B and Type C tests and  $\leq 0.75 L_a$  for Type A tests;
- b. Air lock testing acceptance criteria are:
  - 1. For each air lock, overall leakage rate is  $\leq 0.05 L_a$  when tested at  $\geq P_a$ , and
  - 2. For each door, leakage rate is  $\leq 0.01 L_a$  when tested at  $\geq P_a$ .

- c. Mini-purge valve acceptance criteria is  $\leq 0.05 L_a$  when tested at  $\geq P_a$ .

The provisions of SR 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of SR 3.0.3 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

Insert (3) →

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## TSTF-448 Tech Spec Inserts

### Insert 1

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

### Insert 2

B. One or more CREATS trains inoperable due to inoperable CRE boundary in MODE 1, 2, 3, or 4.	B.1	Initiate action to implement mitigating actions.	Immediately
	<u>AND</u>		
	B.2	Verify mitigating actions ensure CRE occupant exposures to radiological, chemical, and smoke hazards will not exceed limits.	24 hours
	<u>AND</u>		
	B.3	Restore CRE boundary to OPERABLE status.	90 days

### Insert 3

#### 5.5.16 Control Room Envelope Habitability Program

A Control Room Envelope (CRE) Habitability Program shall be established and implemented to ensure that CRE habitability is maintained such that, with an OPERABLE Control Room Emergency Air Treatment System (CREATS), CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under design basis accident (DBA) conditions without personnel receiving radiation exposures in excess of 5 rem total effective dose equivalent (TEDE) for the duration of the accident. The program shall include the following elements:

- a. The definition of the CRE and the CRE boundary.
- b. Requirements for maintaining the CRE boundary in its design condition including configuration control and preventive maintenance.
- c. Requirements for (i) determining the unfiltered air leakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.
- d. The quantitative limits on unfiltered air leakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air leakage measured by the testing described in paragraph c. The unfiltered air leakage limit for radiological challenges is the leakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air leakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis.
- e. The provisions of SR 3.0.2 are applicable to the Frequencies for assessing CRE habitability and determining CRE unfiltered leakage as required by paragraph c.

**Attachment 3**

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**Revised Technical Specification Pages**

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### 3.7 PLANT SYSTEMS

#### 3.7.9 Control Room Emergency Air Treatment System (CREATS)

LCO 3.7.9 Two CREATS Trains shall be OPERABLE.

-----  
- NOTE -  
-----

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

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

#### ACTIONS

CONDITION		REQUIRED ACTION		COMPLETION TIME
A.	One CREATS train inoperable for reasons other than Condition B.	A.1	Restore CREATS train to OPERABLE status.	7 days
B.	One or more CREATS trains inoperable due to inoperable CRE boundary in MODE 1, 2, 3, or 4.	B.1	Initiate action to implement mitigating actions.	Immediately
		<u>AND</u>		
		B.2	Verify mitigating actions ensure CRE occupant exposures to radiological, chemical, and smoke hazards will not exceed limits.	24 hours
		<u>AND</u>		
		B.3	Restore CRE boundary to OPERABLE status.	90 days
C.	Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, 3, or 4.	C.1	Be in MODE 3.	6 hours
		<u>AND</u>		
		C.2	Be in MODE 5.	36 hours

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

#### SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.9.1	Operate each CREATS filtration train $\geq$ 15 minutes.	31 days
SR 3.7.9.2	Perform required CREATS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.9.3	Verify each CREATS train actuates on an actual or simulated actuation signal.	24 months

SURVEILLANCE		FREQUENCY
SR 3.7.9.4	Perform required CRE unfiltered air leakage testing in accordance with the Control Room Envelope Habitability Program	In accordance with the Control Room Envelope Habitability Program

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

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The following programs and manuals shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

The ODCM shall contain:

- a. The methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The radioactive effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports.

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  - 1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s),
  - 2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and does not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after review and acceptance by the onsite review function and the approval of the plant manager; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment Program

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. The systems include Containment Spray, Safety Injection, and Residual Heat Removal in the recirculation configuration. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.5.3 Deleted

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in 10 CFR 20, Appendix B, Table 2, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from the plant to unrestricted areas, conforming to 10 CFR 50, Appendix I and 40 CFR 141;
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;

- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;
- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary conforming to the dose associated with 10 CFR 20, Appendix B, Table 2, Column 1;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from the plant to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from the plant to areas beyond the site boundary, conforming to 10 CFR-50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

#### 5.5.5

##### Component Cyclic or Transient Limit Program

This program provides controls to track the reactor coolant system cyclic and transient occurrences specified in UFSAR Table 5.1-4 to ensure that components are maintained within the design limits.

#### 5.5.6 Pre-Stressed Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with Regulatory Guide 1.35, Revision 2.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

#### 5.5.7 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports. The program shall include the following:

- a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda 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
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

- b. The provisions of SR 3.0.2 are applicable to the above required 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.

5.5.8

Steam Generator (SG) Program

A Steam Generator Program shall be established and implemented to ensure that SG tube integrity is maintained. In addition, the Steam Generator Program shall include the following provisions:

- a. Provisions for condition monitoring assessments. Condition monitoring assessment means an evaluation of the "as found" condition of the tubing with respect to the performance criteria for structural integrity and accident induced leakage. The "as found" condition refers to the condition of the tubing during an SG inspection outage, as determined from the inservice inspection results or by other means, prior to the plugging of tubes. Condition monitoring assessments shall be conducted during each outage during which the SG tubes are inspected or plugged, to confirm that the performance criteria are being met.
- b. Performance criteria for SG tube integrity. Steam generator tube integrity shall be maintained by meeting the performance criteria for tube structural integrity, accident induced leakage, and operational LEAKAGE.
  1. Structural integrity performance criterion: All in-service steam generator tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cool down and all anticipated transients included in the design specification) and design basis accidents. This includes retaining a safety factor of 3.0 against burst under normal steady-state full power operation primary to secondary pressure differential and a safety factor of 1.4 against burst applied to the design basis accident primary-to-secondary pressure differentials. Apart from the above requirements, additional loading conditions associated with the design basis accidents, or combination of accidents in accordance with the design and licensing basis, shall also be evaluated to determine if the associated loads contribute significantly to burst or collapse. In the assessment of tube integrity, those loads that do significantly affect burst or collapse shall be determined and assessed in combination with the loads due to pressure with a safety factor of 1.2 on the combined primary loads and 1.0 on axial secondary loads.
  2. Accident induced leakage performance criterion: The primary to secondary accident induced leakage rate for any design basis accident, other than a SG tube rupture, shall not exceed the leakage rate assumed in the accident analysis in terms of total leakage rate for each SG. Leakage is not to exceed 1 gpm per SG.



3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."
- c. Provisions for SG tube repair criteria. Tubes found by inservice inspection to contain flaws with a depth equal to or exceeding 40% of the nominal tube wall thickness shall be plugged.
- d. Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. The number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial, and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube repair criteria. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 below, the inspection scope, inspection methods, and inspection intervals shall be such as to ensure that SG tube integrity is maintained until the next SG inspection. An assessment of degradation shall be performed to determine the type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.
  1. Inspect 100% of the tubes in each SG during the first refueling outage following SG replacement.
  2. Inspect 100% of the tubes at sequential periods of 144, 108, 72, and, thereafter, 60 effective full power months. The first sequential period shall be considered to begin after the first inservice inspection of the SGs. In addition, inspect 50% of the tubes by the refueling outage nearest the midpoint of the period and the remaining 50% by the refueling outage nearest the end of the period. No SG shall operate for more than 72 effective full power months or three refueling outages (whichever is less) without being inspected.
  3. If crack indications are found in any SG tube, then the next inspection for each SG for the degradation mechanism that caused the crack indication shall not exceed 24 effective full power months or one refueling outage (whichever is less). If definitive information, such as from examination of a pulled tube, diagnostic non-destructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.
- e. Provisions for monitoring operational primary to secondary LEAKAGE.

5.5.9

Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation. This program shall include:

- a. Identification of a sampling schedule for the critical variables and control points for these variables;
- b. Identification of the procedures used to measure the values of the critical variables;
- c. Identification of process sampling points;
- d. Procedures for the recording and management of data;
- e. Procedures defining corrective actions for all off control point chemistry conditions; and
- f. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events, which is required to initiate corrective action.

5.5.10

Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature filter ventilation systems and the Spent Fuel Pool (SFP) Charcoal Adsorber System. The test frequencies will be in accordance with Regulatory Guide 1.52, Revision 2, except that in lieu of 18 month test intervals, a 24 month interval will be implemented. The test methods will be in accordance with Regulatory Guide 1.52, Revision 2, except as modified below.

a. Containment Recirculation Fan Cooler System

1. Demonstrate the pressure drop across the high efficiency particulate air (HEPA) filter bank is < 3 inches of water at a design flow rate ( $\pm 10\%$ ).
2. Demonstrate that an in-place dioctylphthalate (DOP) test of the HEPA filter bank shows a penetration and system bypass < 1.0%.

b. Control Room Emergency Air Treatment System (CREATS)

1. Demonstrate the pressure drop across the combined HEPA filters, the prefilters, the charcoal adsorbers and the post-filters is < 11 inches of water at a design flow rate ( $\pm 10\%$ ).
2. Demonstrate that an in-place DOP test of the HEPA filter bank shows a penetration and system bypass < 0.05%.
3. Demonstrate that an in-place Freon test of the charcoal adsorber bank shows a penetration and system bypass < 0.05%, when tested under ambient conditions.
4. Demonstrate that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows a methyl iodide penetration of less than 1.5% when tested in accordance with ASTM D3803-1989 at a test temperature of 30°C (86°F), a relative humidity of 95%, and a face velocity of 61 ft/min.

c. SFP Charcoal Adsorber System

1. Demonstrate that the total air flow rate from the charcoal adsorbers shows at least 75% of that measured with a complete set of new adsorbers.
2. Demonstrate that an in-place Freon test of the charcoal adsorbers bank shows a penetration and system bypass < 1.0%, when tested under ambient conditions.

3. Demonstrate that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows a methyl iodide penetration of less than 14.5% when tested in accordance with ASTM D3803-1989 at a test temperature of 30°C (86°F) and a relative humidity of 95%.

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

#### 5.5.11

##### Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the waste gas decay tanks and the quantity of radioactivity contained in waste gas decay tanks. The gaseous radioactivity quantities shall be determined following the methodology in NUREG-0133.

The program shall include:

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

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

#### 5.5.12

##### Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

- a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
  1. an API gravity or an absolute specific gravity within limits,

2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and
  3. a clear and bright appearance with proper color or a water and sediment content within limits; and
- b. Within 31 days following addition of the new fuel to the storage tanks, verify that the properties of the new fuel oil, other than those addressed in a. above, are within limits for ASTM 2D fuel oil; and
  - c. Total particulate concentration of the fuel oil is  $\leq 10$  mg/l when tested every 92 days.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies.

#### 5.5.13

##### Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate *administrative controls and reviews*.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
  1. A change in the TS incorporated in the license; or
  2. A change to the UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.

- d. Proposed changes that meet the criteria of Specification 5.5.13.b.1 or Specification 5.5.13.b.2 shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71e.

## 5.5.14

Safety Function Determination Program (SFDP)

This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate actions may be taken as a result of the support system inoperability and corresponding exception to entering supported system Condition and Required Actions. This program implements the requirements of LCO 3.0.6. The SFDP shall contain the following:

- a. Provisions for cross train checks to ensure a loss of the capability to perform the safety function assumed in the accident analysis does not go undetected;
- b. Provisions for ensuring the plant is maintained in a safe condition if a loss of function condition exists;
- c. Provisions to ensure that an inoperable supported system's Completion Time is not inappropriately extended as a result of multiple support system inoperabilities; and
- d. Other appropriate limitations and remedial or compensatory actions.

A loss of safety function exists when, assuming no concurrent single failure, a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:

- a. A required system redundant to the supported system(s) is also inoperable; or
- b. A required system redundant to the system(s) in turn supported by the inoperable supported system is also inoperable; or
- c. A required system redundant to the inoperable support system(s) for the supported systems (a) and (b) above is also inoperable.

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

5.5.15

Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995, as modified by the following exception to NEI 94-01, Rev. 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50, Appendix J":

- a. Section 9.2.3: The first Type A test performed after the May 31, 1996 Type A test shall be performed by May 31, 2011.

The peak calculated containment internal pressure for the design basis loss of coolant accident,  $P_a$ , is 60 psig.

The maximum allowable primary containment leakage rate,  $L_a$ , at  $P_a$ , shall be 0.2% of containment air weight per day.

Leakage Rate acceptance criteria are:

- a. Containment leakage rate acceptance criterion is  $\leq 1.0 L_a$ . During the first plant startup following testing in accordance with this program, the leakage rate acceptance criteria are  $\leq 0.60 L_a$  for the Type B and Type C tests and  $\leq 0.75 L_a$  for Type A tests;
- b. Air lock testing acceptance criteria are:
  - 1. For each air lock, overall leakage rate is  $\leq 0.05 L_a$  when tested at  $\geq P_a$ , and
  - 2. For each door, leakage rate is  $\leq 0.01 L_a$  when tested at  $\geq P_a$ .
- c. Mini-purge valve acceptance criteria is  $\leq 0.05 L_a$  when tested at  $\geq P_a$ .

The provisions of SR 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of SR 3.0.3 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

5.5.16

Control Room Envelope Habitability Program

A Control Room Envelope (CRE) Habitability Program shall be established and implemented to ensure that CRE habitability is maintained such that, with an OPERABLE Control Room Emergency Air Treatment System (CREATS), CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under design basis accident (DBA) conditions without personnel receiving radiation exposures in excess of 5 rem total effective dose equivalent (TEDE) for the duration of the accident. The program shall include the following elements:

- a. The definition of the CRE and the CRE boundary.
  - b. Requirements for maintaining the CRE boundary in its design condition including configuration control and preventive maintenance.
  - c. Requirements for (i) determining the unfiltered air leakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.
  - d. The quantitative limits on unfiltered air leakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air leakage measured by the testing described in paragraph c. The unfiltered air leakage limit for radiological challenges is the leakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air leakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis.
  - e. The provisions of SR 3.0.2 are applicable to the Frequencies for assessing CRE habitability and determining CRE unfiltered leakage as required by paragraph c.
-



**Attachment 4**

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**Proposed Technical Specification Bases Changes (Mark-Up)**

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## B 3.7 PLANT SYSTEMS

### B 3.7.9 Control Room Emergency Air Treatment System (CREATS)

#### BASES

#### BACKGROUND

According to Atomic Industry Forum (AIF) GDC 11 (Ref. 1), a control room shall be provided which permits continuous occupancy under any credible postaccident condition without excessive radiation exposures of personnel. Exposure limits are provided in GDC 19 of 10 CFR 50, Appendix A (Ref. 2), or 10 CFR 50.67 (Ref. 7). By conversion to the alternate source term (AST), Ginna's dose to the control room personnel is restricted to 5 rem TEDE (Ref. 7) for the duration of the accident. The CREATS provides a protected environment from which ~~operators~~ <sup>occupants</sup> can control the plant following a post-accident release of radioactivity for 30 days without exceeding this 5 rem TEDE limit.

AN UNCONTROLLED

hazardous chemicals, or smoke.

The CREATS consists of two trains, each containing a high efficiency particulate air (HEPA) filter, activated charcoal adsorbers for removal of gaseous activity (principally iodines), and one fan (see Figure B 3.7.9-1). Ductwork, dampers, and instrumentation also form part of the system (Ref. 3).

Insert (1) →

The CREATS is an emergency system. Actuation of the CREATS starts both recirculation fans and closes dampers AKD02, AKD03, AKD21, AKD22 AKD23, AKD24. This action isolates the ~~control room emergency zone~~, and begins cleanup recirculation of the control room environment.

CRE

Insert (2) →

#### APPLICABLE SAFETY ANALYSES

The CREATS provides airborne radiological protection for the ~~control room operators~~ <sup>CRE occupants</sup> in MODES 1, 2, 3, and 4, as demonstrated by the ~~control room~~ accident dose analyses for the applicable design basis accidents (DBA)(Ref. 3). This analysis shows that with credit for the CREATS, the dose rates to control room personnel remain within 10 CFR 50.67 limits.

Insert (3)

During movement of irradiated fuel assemblies, the CREATS ensures ~~control room~~ habitability in the event of a fuel handling accident. It has been demonstrated that the CREATS is not required in the event of a waste gas decay tank rupture (Ref. 5), or a spent fuel pool tornado missile accident (Ref. 8).

CRE

Insert (4) →

10 CFR 50.36(c)(2)(ii)

The CREATS satisfies Criterion 3 of the NRC Policy Statement.

#### LCO

The CREATS is comprised of two filtration trains and two independent and redundant isolation damper trains all of which are required to be

Insert (5) →

~~OPERABLE. Total system failure could result in exceeding a dose of 5 rem TEDE to the control room operators in the event of a large radioactive release.~~

~~The CREATS is considered OPERABLE when the individual components necessary to permit CREATS operation are OPERABLE (see Figure B 3.7.9-1). A CREATS train is OPERABLE when the associated:~~

- a. Recirculation fan is OPERABLE and capable of providing forced flow;
- b. HEPA filters and charcoal adsorbers are not excessively restricting flow, and are capable of performing their filtration functions;
- c. Ductwork and dampers associated with the OPERABLE CREATS fan are OPERABLE, and the CREATS filter flow is a nominal 6000 cfm; and
- d. ~~Control room emergency zone isolation dampers are OPERABLE. Dampers AKD03, AKD21, and AKD23 are associated with the A Train. Dampers AKD02, AKD22 and AKD24 are associated with the B train.~~

CRE

CRE

~~The Control Room emergency zone automatic isolation dampers are considered OPERABLE when the damper can close on an actuation signal to isolate outside air or is closed with motive force removed. As an alternative, the redundant isolation damper may be closed with the motive force removed, such that the flow path is not susceptible to the single active failure.~~

Insert (6)

~~The control room emergency zone boundary must be maintained, including the integrity of the walls, floors, ceilings, ductwork, and personnel access doors. Opening of the personnel access doors for entry and exit does not violate the control room emergency zone boundary. A personnel access door or a ventilation system ductwork access door may be opened for extended periods provided a dedicated individual is stationed at the access door to ensure closure, if required (i.e., the individual performs the isolation function) and the door is able to be closed within 60 seconds upon indication of the need to close the door in a radiological event. See Technical Requirements Manual TRB 3.7.8 for assumed isolation time for a toxic gas event.~~ The ventilation ductwork may also be opened for extended periods provided that the affected CREATS filtration train is declared inoperable, and the portion of ductwork that is open is isolated from the control room by a damper that is closed with motive force removed or a passive isolation device. Dampers and duct work in the normal control room HVAC system are isolated by dampers AKD21, AKD22, AKD23, and AKD24, and are not part of control room emergency zone.

New Paragraph

CRE

CRE

ENSURE that the CRE  
will remain habitable

# APPLICABILITY

In MODES 1, 2, 3, and 4, two CREATS trains must be OPERABLE to control operator exposure during and following a DBA.

During movement of irradiated fuel assemblies two CREATS trains must be OPERABLE to cope with the release from a fuel handling accident.

# ACTIONS

## A.1

With one CREATS filtration train inoperable, action must be taken to restore OPERABLE status within 7 days. The 7 day Completion Time is based on the low probability of a DBA occurring during this time frame, and the ability of the remaining OPERABLE CREATS train to provide protection and maintain the control room dose less than the limits of 10 CFR 50.67

## B.1 and B.2

In MODE 1, 2, 3, or 4, if the Required Actions of Condition A cannot be completed within the required Completion Time, the plant must be placed in a MODE that minimizes accident risk. To achieve this status, the plant must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

## C.1 and C.2

During movement of irradiated fuel assemblies, if the Required Actions of Condition A cannot be completed within the required Completion Time, action must be taken to immediately suspend activities that could result in a release of radioactivity that might enter the control room. This requires suspension of movement of irradiated fuel assemblies, which places the plant in a condition that minimizes risk. This does not preclude the movement of fuel or other components to a safe position.

## D.1

In MODE 1, 2, 3, or 4, if both CREATS trains are inoperable, the CREATS may not be capable of performing the intended function and the plant is in a condition outside the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

Insert ⑦ →

E.1 and E.2

During movement of irradiated fuel assemblies with two CREATS trains inoperable, action must be taken immediately to suspend activities that could result in a release of radioactivity that might enter the control room. This requires the suspension of movement of irradiated fuel assemblies, which places the plant in a condition that minimizes accident risk. This does not preclude the movement of fuel or other components to a safe position.

SURVEILLANCE  
REQUIREMENTS

SR 3.7.9.1

Standby systems should be checked periodically to ensure that they function properly. As the environment and normal operating conditions on this system are not too severe, testing each CREATS filtration train once every 31 days for  $\geq 15$  minutes provides an adequate check of this system. The 31 day Frequency is based on the reliability of the equipment, and the two train redundancy availability.

SR 3.7.9.2

This SR verifies that the required CREATS testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). ~~The CREATS filter tests are in general accordance with Regulatory Guide 1.52 (Ref. 4).~~ The VFTP includes testing the performance of the HEPA filter, charcoal adsorber efficiency, flow rate, and the physical properties of the activated charcoal. The required flowrate through each CREATS filtration train is 6000 cubic feet per minute ( $\pm 10\%$ ). Specific test Frequencies and additional information are discussed in detail in the VFTP. ~~However, the maximum surveillance interval for refueling outage tests is based on 24 month refueling cycles and not 18 month cycles as defined by Regulatory Guide 1.52 (Ref. 4).~~

The value of 1.5% methyl iodide penetration was chosen for the laboratory test sample acceptance criteria because, even though the new system contains 4-inch charcoal beds, the design face velocity is 61 fpm. Regulatory Guide 1.52, Revision 3 (Ref. 9), Table 1, provides testing criteria assuming a 40 fpm face velocity. The value of 1.5% was interpolated between the two values listed because of the higher face velocity of Ginna's system. The face velocity is listed in the specification because it is a non standard number. Testing at 61 fpm or greater satisfies the criteria.

SR 3.7.9.3

This SR verifies that each CREATS train starts and operates and that each CREATS automatic damper actuates on an actual or simulated

industry operating experience.

actuation signal. The Frequency of 24 months is based on Regulatory Guide 1.52 (Ref. 4).

Insert 8

REFERENCES

1. Atomic Industry Forum (AIF) GDC 11, Issued for comment July 10, 1967.
2. 10 CFR 50, Appendix A, GDC 19.
3. UFSAR, Section 6.4.
4. ~~Regulatory Guide 1.52, Revision 2.~~
5. ~~Letter from Robert C. Mecredy, RG&E, to Guy S. Vissing, NRC, Subject: Application for Amendment to Facility Operating License Control Room Emergency Air Treatment System (CREATS) Applicability Change (LCO 3.3.6 and LCO 3.7.9), dated July 21, 2000.~~
6. ~~PCR 2003-0049, "CREATS Modifications Inside of the Control Room Emergency Zone".~~
7. 10 CFR 50.67, Accident Source Term
8. ~~DA-NS 2002-049, Tornado Missile Accident Offsite and Control Room Doses, Revision 2~~
9. Regulatory Guide 1.52, Revision 3

UFSAR, Section 7.4

Regulatory Guide 1.196

NEI 99-03, "Control Room Habitability Assessment," June 2001

Insert 9

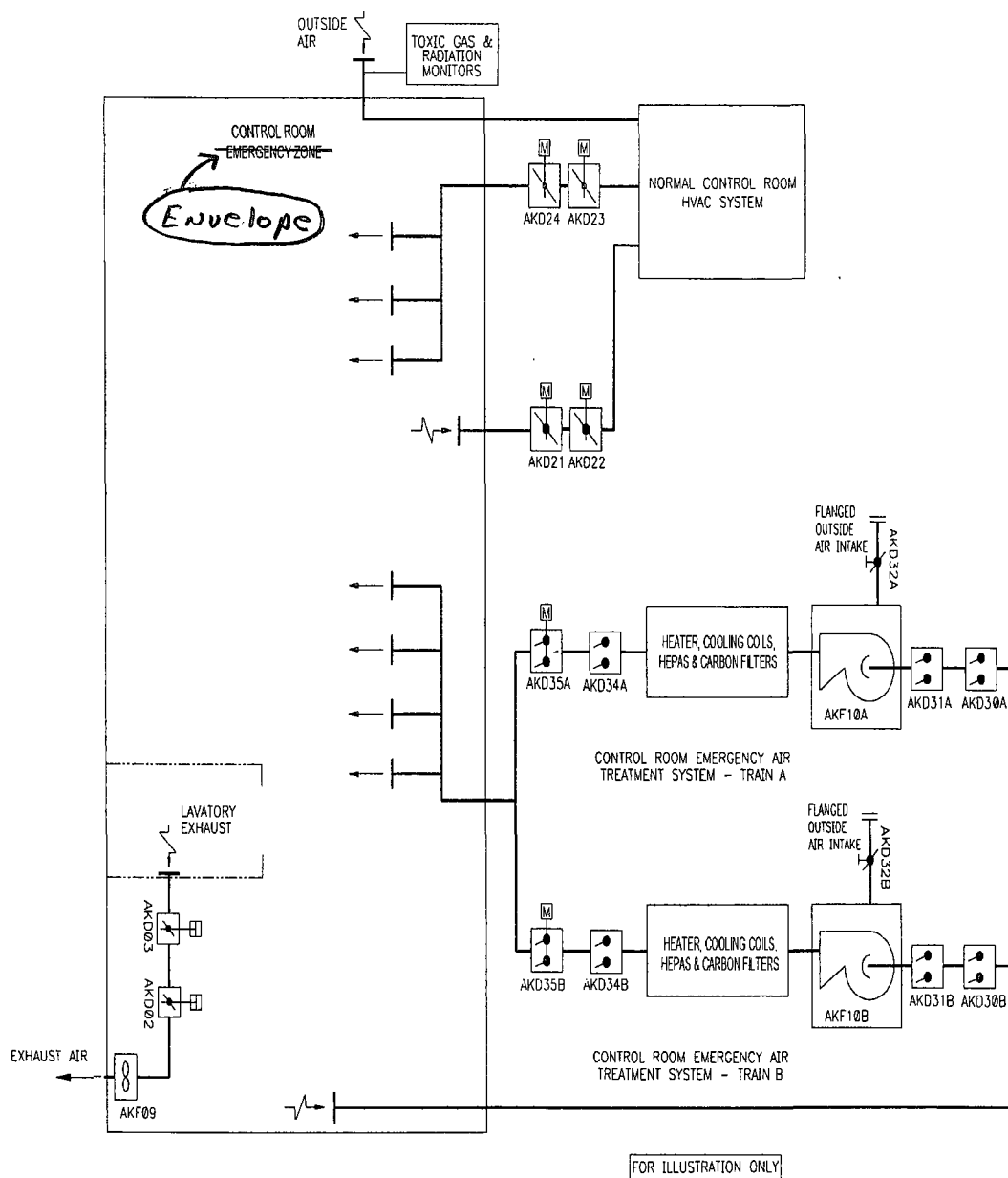


Figure B 3.7.9-1  
CREATS

## **TSTF-448**

### **Bases Inserts**

#### **Insert 1**

The CREATS consists of two independent, redundant trains that re-circulate and filter the air in the control room envelope (CRE) and a CRE boundary that limits the inleakage of unfiltered air. Each CREATS train consists of a pre-filter, a high efficiency particulate air (HEPA) filter, an activated charcoal adsorber section for removal of gaseous activity (principally iodines), and a fan. Ductwork, valves or dampers, doors, barriers, and instrumentation also form part of the system. A second bank of filters follows the adsorber section to collect carbon fines.

The CRE is the area within the confines of the CRE boundary that contains the spaces that control room occupants inhabit to control the unit during normal and accident conditions. This area encompasses the control room, the Shift Manager's office, the lavatory and the kitchen. The CRE is protected during normal operation, natural events, and accident conditions. The CRE boundary is the combination of walls, floor, roof, ducting, doors, penetrations and equipment that physically form the CRE. The OPERABILITY of the CRE boundary must be maintained to ensure that the inleakage of unfiltered air into the CRE will not exceed the inleakage assumed in the licensing basis analysis of design basis accident (DBA) consequences to CRE occupants. The CRE and its boundary are defined in the Control Room Envelope Habitability Program.

#### **Insert 2**

The air entering the CRE is continuously monitored by radiation and toxic gas detectors. Detector output above the setpoint will cause actuation of the CREATS. Redundant recirculation trains provide the required filtration should a fan fail to start or an excessive pressure drop across the other filter train develops. Normally open isolation dampers are arranged in series pairs so that the failure of one damper to shut will not result in a breach of isolation. The CREATS is designed in accordance with Seismic Category I requirements.

The CREATS is designed to maintain a habitable environment in the CRE for 30 days of continuous occupancy after a Design Basis Accident (DBA) without exceeding 5 rem total effective dose equivalent (TEDE).

#### **Insert 3**

The CREATS components are arranged in redundant, safety related ventilation trains. The location of components and ducting within the CRE ensures an adequate supply of filtered air to all areas requiring access.

#### **Insert 4**

The CREATS provides protection from smoke and hazardous chemicals to the CRE occupants. The analysis of hazardous chemical releases demonstrates that the toxicity limits are not exceeded in the CRE following a hazardous chemical release (Ref. 3). The evaluation of a smoke challenge demonstrates that it will not result in the inability of the CRE occupants to control the reactor either from the control room or from the remote shutdown panels (Ref. 4).



The worst case single active failure of a component of the CREATS, assuming a loss of offsite power, does not impair the ability of the system to perform its design function.

#### **Insert 5**

Two independent and redundant CREATS trains are required to be OPERABLE to ensure that at least one is available if a single active failure disables the other train. Total system failure, such as from a loss of both CREATS ventilation trains or from an inoperable CRE boundary, could result in exceeding a dose of 5 rem TEDE to the CRE occupants in the event of a large radioactive release.

Each CREATS train is considered OPERABLE when the individual components necessary to limit CRE occupant exposure are OPERABLE. A CREATS train is OPERABLE when the associated:

#### **Insert 6**

In order for the CREATS trains to be considered OPERABLE, the CRE boundary must be maintained such that the CRE occupant dose from a large radioactive release does not exceed the calculated dose in the licensing basis consequence analyses for DBAs, and that CRE occupants are protected from hazardous chemicals and smoke.

The LCO is modified by a Note allowing the CRE boundary to be opened intermittently under administrative controls. This Note only applies to openings in the CRE boundary that can be rapidly restored to the design condition, such as doors, hatches, floor plugs, and access panels. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls should be proceduralized and consist of stationing a dedicated individual at the opening who is in continuous communication with the operators in the CRE. This individual will have a method to rapidly close the opening and to restore the CRE boundary to a condition equivalent to the design condition when a need for CRE isolation is indicated. The assumed isolation times in the analyses are 60 seconds for radiation and 30 seconds for toxic chemicals.

#### **Insert 7**

##### **A.1**

When one CREATS train is inoperable, for reasons other than an inoperable CRE boundary, action must be taken to restore OPERABLE status within 7 days. In this Condition, the remaining OPERABLE CREATS train is adequate to perform the CRE occupant protection function. However, the overall reliability is reduced because a failure in the OPERABLE CREATS train could result in loss of CREATS function. The 7 day Completion Time is based on the low probability of a DBA occurring during this time period, and ability of the remaining train to provide the required capability.

### B.1, B.2, and B.3

If the unfiltered inleakage of potentially contaminated air past the CRE boundary and into the CRE can result in CRE occupant radiological dose greater than the calculated dose of the licensing basis analyses of DBA consequences (allowed to be up to 5 rem TEDE), or inadequate protection of CRE occupants from hazardous chemicals or smoke, the CRE boundary is inoperable. Actions must be taken to restore an OPERABLE CRE boundary within 90 days.

During the period that the CRE boundary is considered inoperable, action must be initiated to implement mitigating actions to lessen the effect on CRE occupants from the potential hazards of a radiological or chemical event or a challenge from smoke. Actions must be taken within 24 hours to verify that in the event of a DBA, the mitigating actions will ensure that CRE occupant radiological exposures will not exceed the calculated dose of the licensing basis analyses of DBA consequences, and that CRE occupants are protected from hazardous chemicals and smoke. These mitigating actions (i.e., actions that are taken to offset the consequences of the inoperable CRE boundary) should be preplanned for implementation upon entry into the condition, regardless of whether entry is intentional or unintentional. The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period, and the use of mitigating actions. The 90 day Completion Time is reasonable based on the determination that the mitigating actions will ensure protection of CRE occupants within analyzed limits while limiting the probability that CRE occupants will have to implement protective measures that may adversely affect their ability to control the reactor and maintain it in a safe shutdown condition in the event of a DBA. In addition, the 90 day Completion Time is a reasonable time to diagnose, plan and possibly repair, and test most problems with the CRE boundary.

### C.1 and C.2

In MODE 1, 2, 3, or 4, if the inoperable CREATS train or the CRE boundary cannot be restored to OPERABLE status within the required Completion Time, the unit must be placed in a MODE that minimizes accident risk. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

### D.1 and D.2

During movement of irradiated fuel assemblies, if the inoperable CREATS train cannot be restored to OPERABLE status within the required Completion Time, action must be taken to immediately place the OPERABLE CREATS train in the emergency mode. This action ensures that the remaining train is OPERABLE, that no failures preventing automatic actuation will occur, and that any active failure would be readily detected.

An alternative to Required Action D.1 is to immediately suspend activities that could result in a release of radioactivity that might require isolation of the CRE. This places the unit in a condition that minimizes the accident risk. This does not preclude the movement of fuel to a safe position.

## E.1

During movement of irradiated fuel assemblies, with two CREATS trains inoperable or with one or more CREATS trains inoperable due to an inoperable CRE boundary, action must be taken immediately to suspend activities that could result in a release of radioactivity that might require isolation of the CRE. This places the unit in a condition that minimizes the accident risk. This does not preclude the movement of fuel to a safe position.

## F.1

If both CREATS trains are inoperable in MODE 1, 2, 3, or 4 for reasons other than an inoperable CRE boundary (i.e., Condition B), the CREATS may not be capable of performing the intended function and the unit is in a condition outside the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

## **Insert 8**

### **SR 3.7.9.4**

This SR verifies the OPERABILITY of the CRE boundary by testing for unfiltered air inleakage past the CRE boundary and into the CRE. The details of the testing are specified in the Control Room Envelope Habitability Program.

The CRE is considered habitable when the radiological dose to CRE occupants calculated in the licensing basis analyses of DBA consequences is no more than 5 rem TEDE and the CRE occupants are protected from hazardous chemicals and smoke. This SR verifies that the unfiltered air inleakage into the CRE is no greater than the flow rate assumed in the licensing basis analyses of DBA consequences. When unfiltered air inleakage is greater than the assumed flow rate, Condition B must be entered. Required Action B.3 allows time to restore the CRE boundary to OPERABLE status provided mitigating actions can ensure that the CRE remains within the licensing basis habitability limits for the occupants following an accident. Compensatory measures are discussed in Regulatory Guide 1.196, Section C.2.7.3, (Ref. 5) which endorses, with exceptions, NEI 99-03, Section 8.4 and Appendix F (Ref. 6). These compensatory measures may also be used as mitigating actions as required by Required Action B.2. Temporary analytical methods may also be used as compensatory measures to restore OPERABILITY (Ref. 8). Options for restoring the CRE boundary to OPERABLE status include changing the licensing basis DBA consequence analysis, repairing the CRE boundary, or a combination of these actions. Depending upon the nature of the problem and the corrective action, a full scope inleakage test may not be necessary to establish that the CRE boundary has been restored to OPERABLE status.

## **Insert 9**

Letter from Eric J. Leeds (NRC) to James W. Davis (NEI) dated January 30, 2004, "NEI Draft White Paper, Use of Generic Letter 91-18 Process and Alternative Source Terms in the Context of Control Room Habitability." (ADAMS Accession No. ML040300694).