

ATTACHMENT A

PROPOSED SPECIFICATION - UNIT 2

8506250162 850621
PDR ADOCK 05000361
P PDR

REFUELING OPERATIONS

3/4.9.12 FUEL HANDLING BUILDING POST-ACCIDENT CLEANUP FILTER SYSTEM

LIMITING CONDITION FOR OPERATION

3.9.12 Two independent fuel handling building post-accident cleanup filter systems shall be OPERABLE.

APPLICABILITY: Whenever irradiated fuel is in the storage pool.

ACTION:

- a. With one fuel handling building post-accident cleanup filter system inoperable, fuel movement within the storage pool or operation of fuel handling machine over the storage pool may proceed provided the OPERABLE fuel handling building post-accident cleanup filter system is capable of being powered from an OPERABLE emergency power source and is in operation and discharging through at least one train of HEPA filters and charcoal absorbers.
- b. With no fuel handling building post-accident cleanup filter system OPERABLE, suspend all operations involving movement of fuel within the storage pool or operation of fuel handling machine over the storage pool until at least one fuel handling building post-accident cleanup filter system is restored to OPERABLE status.
- c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.12. The above required fuel handling building post-accident cleanup filter systems shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 hours with the heaters on.
- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:

ATTACHMENT B
PROPOSED SPECIFICATION - UNIT 3

REFUELING OPERATIONS

3/4.9.12 FUEL HANDLING BUILDING POST-ACCIDENT CLEANUP FILTER SYSTEM

LIMITING CONDITION FOR OPERATION

3.9.12 Two independent fuel handling building post-accident cleanup filter systems shall be OPERABLE.

APPLICABILITY: Whenever irradiated fuel is in the storage pool.

ACTION:

- a. With one fuel handling building post-accident cleanup filter system inoperable, fuel movement within the storage pool or operation of fuel handling machine over the storage pool may proceed provided the OPERABLE fuel handling building post-accident cleanup filter system is capable of being powered from an OPERABLE emergency power source and is in operation and discharging through at least one train of HEPA filters and charcoal absorbers.
- b. With no fuel handling building post-accident cleanup filter system OPERABLE, suspend all operations involving movement of fuel within the storage pool or operation of fuel handling machine over the storage pool until at least one fuel handling building post-accident cleanup filter system is restored to OPERABLE status.
- c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.12 The above required fuel handling building post-accident cleanup filter systems shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 hours with the heaters on.
- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:

ATTACHMENT C
DESCRIPTION AND BASIS

Date of Amendment Request: May 30, 1985 (Reference PCN-193)

Description of Amendment Request

The proposed change would revise Technical Specification (TS) 3/4.9.12 "Fuel Handling Building Post-Accident Cleanup Filter System." TS 3/4.9.12 requires the operability of two independent fuel handling building post-accident cleanup filter system (FHBPAFCS) trains. The purpose of the FHBPAFCS is to ensure that radioactive material released from an irradiated fuel assembly after a fuel handling accident will be filtered through the HEPA filter and charcoal adsorbers. The action required by TS 3/4.9.12 if one of the two filter systems becomes inoperable is to restore the inoperable system to operable status within seven days or suspend operation involving movement of fuel within the storage pool or operation of the fuel handling machine over the storage pool. The proposed change would revise the action in the event of one of the two filter systems becoming inoperable to require that the remaining filter system be placed in operation and be discharging through at

least one train of HEPA filters and charcoal absorbers. The proposed change would allow fuel handling operations to continue while complying with these action requirements.

Basis For Proposed No Significant Hazards Consideration Determination:

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (vi) relates to a change which either may result in some increased probability or consequences of a previously analyzed accident or may reduce in some way a safety margin but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan (SRP). SRP Section 9.4.2, "Spent Fuel Pool Area Ventilation System" defines acceptance criteria for the FHBPAFCS. The purpose of the FHBPAFCS is to reduce the offsite dose consequences of a postulated fuel handling accident. In part, SRP 9.4.2 requires that a single active failure should not result in loss of system functional performance capability. This requirement is satisfied by two independent FHBPAFCS trains both of which are required by the TS to be operable whenever spent fuel is in the fuel storage pool. As a compensatory measure when one train is out of service (for maintenance) the TS currently prohibits fuel handling operation if the inoperable train is not returned to service within seven days. The proposed change would allow fuel handling operation to continue beyond the seven days if the inoperable train is not returned to service provided that the remaining operable train is placed in operation and be discharging through

at least one train of HEPA filters and charcoal absorbers. Otherwise, the proposed change would require that fuel handling operation be suspended. The proposed change will allow SCE to take credit for the less restrictive action statements associated with operability of this system. Standard Review Plan (SRP) Section 9.4.2, Spent Fuel Pool Area Ventilation System, provides the pertinent technical acceptance criteria. As stated in the SRP, the Technical Specification acceptance criteria specifies that the proposed Technical Specifications will be considered to be acceptable if they are consistent with the regulatory guidance contained in the Standard Technical Specifications (NUREG-0212). Proposed Change NPF-10/15-193 makes the Technical Specification 3/4.9.12 action statements consistent with Standard Technical Specification 3/4.9.12, Storage Pool Air Cleanup System and are therefore acceptable. Therefore, the proposed change is similar to example (vi) and does not involve significant hazards consideration.

BRD:4397F