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

10 CFR 50.90

**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT REQUESTS TO LICENSE
NO. NPF-14 AND LICENSE NO. NPF-22: ADOPTION OF
TECHNICAL SPECIFICATION TASK FORCE TRAVELER
TSTF-522-A, REVISION 0, "REVISE VENTILATION SYSTEM
SURVEILLANCE REQUIREMENTS TO OPERATE FOR
10 HOURS PER MONTH" USING THE CONSOLIDATED
LINE ITEM IMPROVEMENT PROCESS
PLA-7444**

**Docket Nos. 50-387
and 50-388**

*Reference: Technical Specification Task Force Traveler TSTF-522-A, Revision 0,
"Revise Ventilation System Surveillance Requirements to Operate for
10 Hours Per Month."*

In accordance with the provisions of Section 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), Susquehanna Nuclear, LLC is submitting a request for an amendment to the Technical Specifications (TS) for Susquehanna Steam Electric Station (SSES) Units 1 and 2.

The proposed amendment would modify the TS by changing the run time of monthly Surveillance Requirements (SR) for the Standby Gas Treatment and Control Room Emergency Outside Air Supply Systems from 10 hours to 15 minutes.

Enclosure 1 provides an evaluation of the proposed changes, a description of the proposed change, the requested confirmation of applicability, and No Significant Hazards Consideration. Attachment 1 provides the existing TS pages marked up to show the proposed changes. Attachment 2 provides the existing TS Bases pages marked up to show the proposed changes, for information only. Attachment 3 contains final revisions of the affected TS pages.

Susquehanna requests approval of the proposed license amendment by July 28th, 2017, with the amendment being implemented within 60 days.

There are no regulatory commitments associated with these proposed changes.

The need for this change has been discussed with the SSES NRC Project Manager. Additionally, the change has been reviewed by the SSES Plant Operations Review Committee (PORC) and by the Nuclear Safety Review Board (NSRB).

In accordance with 10 CFR 50.91(b), Susquehanna Nuclear, LLC is providing the Commonwealth of Pennsylvania with a copy of this proposed License Amendment request.

If you have any questions or require additional information, please contact Mr. Jason Jennings at (570) 542-3155.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 2/1/17

Sincerely,



R. J. Franssen

Included documents:

Enclosure 1	Evaluation of Proposed Change
Attachment 1	Markups of Existing Technical Specifications
Attachment 2	Markups of Existing Technical Specification Bases, information only
Attachment 3	Revised Technical Specifications

Copy: NRC Region I
Mr. J. E. Greives, NRC Sr. Resident Inspector
Ms. T. E. Hood, NRC Project Manager
Mr. M. Shields, PA DEP/BRP

Enclosure 1 to PLA-7444

SUSQUEHANNA STEAM ELECTRIC STATION APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-522-A, REVISION 0, “REVISE VENTILATION SYSTEM SURVEILLANCE REQUIREMENTS TO OPERATE FOR 10 HOURS PER MONTH” USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

1. INTRODUCTION
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EVALUATION OF THE PROPOSED CHANGES

Subject: SUSQUEHANNA STEAM ELECTRIC STATION APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-522-A, REVISION 0, “REVISE VENTILATION SYSTEM SURVEILLANCE REQUIREMENTS TO OPERATE FOR 10 HOURS PER MONTH” USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

1.0 INTRODUCTION

The proposed change revises Surveillance Requirements for Standby Gas Treatment (SGTS) and Control Room Emergency Outside Air Supply (CREOAS) filter trains. The SRs currently require operation of each filter train for a continuous period of ≥ 10 hours every 31 days with heaters running. Adoption of TSTF-522-A, Revision 0, would reduce the required run time to ≥ 15 minutes at a frequency controlled in accordance with the SFCP. No other changes to the SRs are requested.

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

The availability of this TS improvement was announced in the Federal Register published on September 20, 2012 [77 FR 58421]² as part of the Consolidated Line Item Improvement Process (CLIIP).

Susquehanna has reviewed the model safety evaluation published on the ADAMS website by the NRC, dated September 20, 2012. Input from various departments within the organization was obtained to determine applicability of the change. The cross departmental review included consideration of the NRC staff's evaluation, as well as the information provided in TSTF-522. Susquehanna has concluded that the justifications presented in these documents are applicable to Susquehanna (SSES) Units 1 and 2 and desires to incorporate the proposed changes into SSES Technical Specifications.

2.2 Optional Changes and Variations

Susquehanna is not proposing any significant variations or deviations from the TS changes described in TSTF-522-A, Rev 0, or the applicable parts of the NRC's model SE dated September 20, 2012. Susquehanna is noting the following minor variations from the TS changes described in TSTF-522-A:

- One of the two affected TS referenced in TSTF-522-A for General Electric BWR/4 plants differs in number and name for the applicable system at SSES. Specifically, the TSTF lists 3.6.4.3 as the affected TS for the SGTS and TS 3.7.4 for Main Control Room Environmental Control (MCREC). While SSES TS 3.6.4.3 corresponds to SGTS, TS 3.7.3 corresponds to CREOASS (the equivalent of MCREC). This is purely an administrative issue and does not affect the applicability of TSTF-522 to SSES TSs.
- Bracketed references to the Surveillance Frequency Control Program (SFCP) are included. In 2014, SSES submitted a License Amendment Request (LAR) to the NRC requesting to adopt TSTF-425, Rev 3⁽⁹⁾, which would transfer control of certain SR frequencies to the licensee. Approval to adopt TSTF-425 was granted by the NRC on 05/20/16⁽¹⁰⁾ and the change was incorporated by the required date. Therefore, this request (to adopt TSTF-522) is written in a manner that reflects use of the SFCP.
- Bracketed references to heater operation for both the SGT and CREOAS Systems are included. TSTF-522, Section 4.0, "Technical Analysis," discusses the use of heaters during ventilation system operation and the Ventilation and Filter Testing Program (VFTP) requirement to test charcoal adsorbers in accordance with ASTM D3803-1989⁽⁷⁾. SSES tests all ESF charcoal adsorber samples obtained as described in Section C.6.b. of RG 1.52, Rev. 2⁽³⁾ at a relative humidity greater than or equal to 70% and a temperature less than or equal to 30°C in accordance with ASTM D3803-1989 as specified in the VFTP⁽⁶⁾, and therefore, the requirement to maintain heater operation when performing the affected SRs is maintained.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

Susquehanna requests adoption of an approved change to Susquehanna Steam Electric Station (SSES) Unit 1 and Unit 2 Technical Specifications (TS). The changes will revise the existing Surveillance Requirements (SRs) of TS 3.6.4.3, *"Standby Gas Treatment (SGT) System,"* and TS 3.7.3, *"Control Room Emergency Outside Air Supply System."*

SR 3.6.4.3.1 currently requires each filter train in the Standby Gas Treatment System (SGTS) to be operated 10 continuous hours with heaters operating every 31 days. SR 3.7.3.1 currently requires each filter train in the Control Room Emergency Outside Air Supply System (CREOASS) to be operated 10 continuous hours with heaters operating every 31 days. Both SRs are revised by this request to require each filter train to be operated for 15 continuous minutes with heater operation at a frequency controlled in accordance with the SFCP.

As required by 10 CFR 50.91(a), an analysis of the issue of no significant hazards consideration is presented below.

- 1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?**

Response: No

The proposed change modifies the performance length of an existing Surveillance Requirement of the SGT and CREOAS Systems. The requirement for heater operation will not be modified.

These systems are not accident initiators and therefore the proposed changes cannot increase the probability of an accident previously evaluated. The proposed changes are consistent with current regulatory guidance for these systems and will continue to assure that these systems perform their design function(s), which may include mitigating accident consequences. Therefore, the change does not involve a significant increase in the consequences of an accident.

Therefore, it is concluded that this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No

The changes proposed do not change the way the system is operated or maintained. The changes reduce the performance length of existing SRs. The reduced performance length will continue to demonstrate that the Limiting Conditions for Operation (LCO) for the SGT and CREOAS systems are met. The change does not create new failure modes or mechanisms and no new accident precursors are generated.

Therefore, it is concluded that this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No

This change reduces the performance length of SRs used to demonstrate operability of the CREOAS and SGT systems. This change is consistent with current regulatory guidance for these systems.

Therefore, it is concluded that this change does not involve a significant reduction in a margin of safety.

Based on the responses above, Susquehanna concludes that the proposed change presents No Significant Hazards Consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "No Significant Hazards Consideration" is justified.

4.0 ENVIRONMENTAL EVALUATION

The proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9).

Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

5.0 REFERENCES

1. Technical Specifications Task Force Traveler, TSTF-522-A, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 Hours Per Month."
2. Federal Register Notice: Nuclear Regulatory Commission Notice of Availability for Proposed Model Safety Evaluation for TSTF-522-A, Issued September 20, 2012.
3. Nuclear Regulatory Commission Regulatory Guide 1.52, Revision 2, Issued March, 1978
4. Nuclear Regulatory Commission Regulatory Guide 1.52, Revision 3, Issued June, 2001
5. Susquehanna FSAR Section 3.13, Compliance with Regulatory Guides; Regulatory Guide 1.52
6. Susquehanna TS section 5.5.7.c., Ventilation Filter Testing Program (VFTP); Requirements for laboratory testing of ESF charcoal adsorber samples
7. ASTM D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon"
8. NRC Generic Letter 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," Issued June 3, 1999.
9. PPL Susquehanna, LLC, Unit 1 & Unit 2 Proposed Technical Specification Amendment for Adoption of Task Force Traveler TSTF-425, Rev 3., "Relocate Surveillance Frequencies to Licensee Control," Submitted October 27, 2014. ADAMS accession numbers [ML14316A605, ML14316A606, and ML14316A607].
10. Susquehanna Steam Electric Station, Units 1 and 2 – Issuance of Amendments Re: Adoption of TSTF-425 (CAC Nos. MF5151 and MF5152) [Accession No. ML16005A234]

Attachment 1 to PLA-7444

SUSQUEHANNA STEAM ELECTRIC STATION APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-522-A, REVISION 0, “REVISE VENTILATION SYSTEM SURVEILLANCE REQUIREMENTS TO OPERATE FOR 10 HOURS PER MONTH” USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

Markups of Existing Technical Specifications

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Two SGT subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.	F.1 -----NOTE----- LCO 3.0.3 is not applicable. ----- Suspend movement of irradiated fuel assemblies in secondary containment. <u>AND</u>	Immediately
	F.2 Suspend CORE ALTERATIONS. <u>AND</u>	Immediately
	F.3 Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.4.3.1 Operate each SGT filter train for ≥ 10 15 continuous hours minutes with heaters operating.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.2 Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3 Verify each SGT subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.4 Verify each SGT filter cooling bypass and outside air damper opens and the fan starts on high charcoal temperature.	In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Two SGT subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.	F.1 -----NOTE----- LCO 3.0.3 is not applicable. -----	
	Suspend movement of irradiated fuel assemblies in secondary containment.	Immediately
	<u>AND</u>	
	F.2 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	F.3 Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.4.3.1 Operate each SGT filter train for ≥ 40 15 continuous hours minutes with heaters operating.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.2 Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3 Verify each SGT subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.4 Verify each SGT filter cooling bypass and outside air damper opens and the fan starts on high charcoal temperature.	In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Two CREOAS subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p> <p><u>OR</u></p> <p>One or more CREOAS subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p>	
	<p>F.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p> <p><u>AND</u></p>	Immediately
	<p>F.2 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>F.3 Initiate action to suspend OPDRVs.</p>	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.3.1 Operate each CREOAS filter train for ≥ 40 15 continuous hours minutes with the heaters operable.	In accordance with the Surveillance Frequency Control Program
SR 3.7.3.2 Perform required CREOAS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.3.3 Verify each CREOAS subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Two CREOAS subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p> <p>OR</p> <p>One or more CREOAS subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p>	
	<p>F.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p> <p><u>AND</u></p>	Immediately
	<p>F.2 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>F.3 Initiate action to suspend OPDRVs.</p>	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.3.1 Operate each CREOAS filter train for ≥ 10 15 continuous hours minutes with the heaters operable.	In accordance with the Surveillance Frequency Control Program
SR 3.7.3.2 Perform required CREOAS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.3.3 Verify each CREOAS subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program

(continued)

Attachment 2 to PLA-7444

SUSQUEHANNA STEAM ELECTRIC STATION APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-522-A, REVISION 0, “REVISE VENTILATION SYSTEM SURVEILLANCE REQUIREMENTS TO OPERATE FOR 10 HOURS PER MONTH” USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

**Markups of Existing Technical Specifications Bases
(Information Only)**

BASES

ACTIONS

F.1, F.2, and F.3 (continued)

Required Action F.1 has been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

SURVEILLANCE REQUIREMENTS

SR 3.6.4.3.1

Operating each SGT filter train for ≥ 40 15 continuous hours minutes with heaters on ensures that both filter trains are OPERABLE and that all associated controls are functioning properly. It also ensures that blockage, fan or motor failure, or excessive vibration can be detected for corrective action. ~~Operation with the heaters on (automatic heater cycling to maintain temperature) for ≥ 10 continuous hours every 31 days eliminates moisture on the adsorbers and HEPA filters.~~ The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.6.4.3.2

This SR verifies that the required SGT filter testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The VFTP includes testing HEPA filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal (general use and following specific operations). Specific test frequencies and additional information are discussed in detail in the VFTP.

SR 3.6.4.3.3

This SR verifies that each SGT subsystem starts on receipt of an actual or simulated initiation signal. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

(continued)

BASES (continued)

ACTIONS

F.1, F.2, and F.3 (continued)

Required Action F.1 has been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

SURVEILLANCE
REQUIREMENTS

SR 3.6.4.3.1

Operating each SGT filter train for ≥ 40 15 continuous ~~hours~~ minutes with heaters on ensures that both filter trains are OPERABLE and that all associated controls are functioning properly. It also ensures that blockage, fan or motor failure, or excessive vibration can be detected for corrective action. ~~Operation with the heaters on (automatic heater cycling to maintain temperature) for ≥ 10 continuous hours every 31 days eliminates moisture on the adsorbers and HEPA filters.~~ The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.6.4.3.2

This SR verifies that the required SGT filter testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The VFTP includes testing HEPA filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal (general use and following specific operations). Specific test frequencies and additional information are discussed in detail in the VFTP.

SR 3.6.4.3.3

This SR verifies that each SGT subsystem starts on receipt of an actual or simulated initiation signal. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

(continued)

BASES

ACTIONS (continued)

F.1, F.2, and F.3

The Required Actions of Condition F are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require either an entry into LCO 3.0.3 or a reactor shutdown in accordance with LCO 3.0.3.

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, with two CREOAS subsystems inoperable or with one or more CREOAS subsystems inoperable due to an inoperable CRE boundary, action must be taken immediately to suspend activities that present a potential for releasing radioactivity that might require pressurization of the CRE. This places the unit in a condition that minimizes the accident risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. If applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

SURVEILLANCE REQUIREMENTS

SR 3.7.3.1

This SR verifies that a CREOAS fan in a standby mode starts on demand from the control room and continues to operate with flow through the HEPA filters and charcoal adsorbers. Standby systems should be checked periodically to ensure that they start and function properly. As the environmental and normal operating conditions of this system are not severe, testing each subsystem once every month provides an adequate check on this system. ~~Heater operation dries out any moisture that has accumulated in the charcoal as a result of humidity in the~~

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.7.3.1 (continued)

~~ambient air.~~ Systems with heaters must be operated for \geq ~~10~~ 15 continuous ~~hours~~ minutes with the heaters energized. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.7.3.2

This SR verifies that the required CREOAS testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The VFTP includes testing HEPA filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal (general use and following specific operations). Specific test Frequencies and additional information are discussed in detail in the VFTP.

SR 3.7.3.3

This SR verifies that on an actual or simulated initiation signal, each CREOAS subsystem starts and operates. The LOGIC SYSTEM FUNCTIONAL TEST in SR 3.3.7.1.5 overlaps this SR to provide complete testing of the safety function. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.7.3.4

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 whole body or its equivalent to any part of the body and the CRE occupants are protected from hazardous chemicals and smoke. This SR verifies that the unfiltered air inleakage into the CRE is no

(continued)

BASES

ACTIONS (continued)

F.1, F.2, and F.3

The Required Actions of Condition F are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require either an entry into LCO 3.0.3 or a reactor shutdown in accordance with LCO 3.0.3.

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, with two CREOAS subsystems inoperable or with one or more CREOAS subsystems inoperable due to an inoperable CRE boundary, action must be taken immediately to suspend activities that present a potential for releasing radioactivity that might require pressurization of the CRE. This places the unit in a condition that minimizes the accident risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. If applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

SURVEILLANCE REQUIREMENTS

SR 3.7.3.1

This SR verifies that a CREOAS fan in a standby mode starts on demand from the control room and continues to operate with flow through the HEPA filters and charcoal adsorbers. Standby systems should be checked periodically to ensure that they start and function properly. As the environmental and normal operating conditions of this system are not severe, testing each subsystem once every month provides an adequate check on this system. ~~Monthly heater operation dries out any moisture that has accumulated in the charcoal as a result of humidity in the ambient air.~~ Systems with heaters must be operated for ≥ 10 15 continuous hours minutes. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

(continued)

Attachment 3 to PLA-7444

SUSQUEHANNA STEAM ELECTRIC STATION APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-522-A, REVISION 0, “REVISE VENTILATION SYSTEM SURVEILLANCE REQUIREMENTS TO OPERATE FOR 10 HOURS PER MONTH” USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

Revised Technical Specifications

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Two SGT subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.	F.1 -----NOTE----- LCO 3.0.3 is not applicable. ----- Suspend movement of irradiated fuel assemblies in secondary containment.	Immediately
	<u>AND</u> F.2 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u> F.3 Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.4.3.1 Operate each SGT filter train for ≥ 15 continuous minutes with heaters operating.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.2 Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3 Verify each SGT subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.4 Verify each SGT filter cooling bypass and outside air damper opens and the fan starts on high charcoal temperature.	In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Two SGT subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.	F.1 -----NOTE----- LCO 3.0.3 is not applicable. -----	
	Suspend movement of irradiated fuel assemblies in secondary containment. <u>AND</u>	Immediately
	F.2 Suspend CORE ALTERATIONS. <u>AND</u>	Immediately
	F.3 Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.4.3.1 Operate each SGT filter train ≥ 15 continuous minutes with heaters operating.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.2 Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3 Verify each SGT subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.4 Verify each SGT filter cooling bypass and outside air damper opens and the fan starts on high charcoal temperature.	In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Two CREOAS subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p> <p><u>OR</u></p> <p>One or more CREOAS subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p>	
	<p>F.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p> <p><u>AND</u></p>	Immediately
	<p>F.2 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>F.3 Initiate action to suspend OPDRVs.</p>	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.3.1 Operate each CREOAS filter train for ≥ 15 continuous minutes with the heaters operable.	In accordance with the Surveillance Frequency Control Program
SR 3.7.3.2 Perform required CREOAS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.3.3 Verify each CREOAS subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Two CREOAS subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p> <p>OR</p> <p>One or more CREOAS subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p>	
	<p>F.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p> <p><u>AND</u></p>	Immediately
	<p>F.2 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>F.3 Initiate action to suspend OPDRVs.</p>	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.3.1 Operate each CREOAS filter train for ≥ 15 continuous minutes with the heaters operable.	In accordance with the Surveillance Frequency Control Program
SR 3.7.3.2 Perform required CREOAS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.3.3 Verify each CREOAS subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program

(continued)