

## REFUELING OPERATIONS

### SURVEILLANCE REQUIREMENTS (Continued)

4.9.4.2 The Reactor Building Containment Purge System shall be demonstrated OPERABLE:

- a. At least once per 31 days by initiating flow through the HEPA filters and activated carbon adsorbers and verifying that the system operates for at least 10 continuous hours with the heaters operating;
- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or activated carbon adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the system by:
  - 1) Verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 1% and uses the test procedures guidance in Regulatory Positions C.5.a, C.5.c, and C.5.d\* of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 25,000 cfm  $\pm$  10% (both exhaust fans operating);
  - 2) Verifying within 31 days after removal, that a laboratory analysis of a representative activated carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ~~Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978,~~ for a methyl iodide penetration of less than 6%; and
  - 3) Verifying a system flow rate of 25,000 cfm  $\pm$  10% (both exhaust fans operating) during system operation when tested in accordance with ANSI N510-1980.
- c. After every 720 hours of activated carbon adsorber operation, by verifying, within 31 days after removal, that a laboratory analysis of a representative activated carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ~~Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978,~~ for a methyl iodide penetration of less than 6%;
- d. At least once per 18 months by:
  - 1) Verifying that the pressure drop across the combined HEPA filters, activated carbon adsorber banks, and prefilters is less than 8 inches Water Gauge while operating the system at a flow rate of 25,000 cfm  $\pm$  10% (both exhaust fans operating); and

\*The requirement for reducing refrigerant concentration to 0.01 ppm may be satisfied by operating the system for 10 hours with heaters on and operating.

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ASTM D3803-86, Test Method "A"  
(Exception to Test Method "A" will be the use of 70% relative humidity in place of 95% as stipulated in Test Method "A".)

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ATTACHMENT II

## TECHNICAL SPECIFICATION CHANGE REQUEST

### Proposed Technical Specification Change

This Technical Specification(TS) change request changes TSs 4.9.4.2.b.2 and 4.9.4.2.c to read "meets the laboratory testing criteria of ASTM D3803-86, Test Method "A"(Exception to Test Method "A" will be the use of 70% relative humidity in place of 95% as stipulated by Test Method "A").". This change is made to consistently reference the same laboratory testing standard for all carbon adsorber beds.

### Discussion

During the HVAC Review process currently in progress at Catawba Nuclear Station, it was discovered that the TS for laboratory testing of adsorber bed carbon for various safety-related ventilation systems was not conservative with respect to Regulatory Guide 1.52, Revision 2 March 1978. Catawba Nuclear Station is proposing modifications to the TS in order to ensure consistent laboratory carbon testing.

### Technical Justification

This change will ensure consistent laboratory testing for all of the ventilation systems at Catawba. There will be no change in the actual test requirements for the Containment Purge System. The Exception to ASTM D3803-86 Test Method "A" will allow laboratory testing of carbon samples from the Containment Purge System at 70% relative humidity instead of 95% as required by the Standard. This is consistent with current TS requirements for the Containment Purge System and Regulatory Guide 1.52, Revision 2, March 1978 guidance.

It is not necessary to test the Containment Purge System at 95% relative humidity to maintain conservatism. The Containment Purge System is isolated on high radiation and high humidity signals. Electric preheaters maintain the relative humidity less than or equal to 70% Upstream of the Containment purge exhaust. Since Containment Purge System operation is intermittent, relative humidity is monitored in the vicinity of the carbon adsorbers.

Since the Containment Purge System is isolated on high humidity current test requirements are conservative. This proposed TS amendment will not alter those requirements, it will make the Standards referenced in the ventilation TS consistent and ensure that laboratory testing of carbon samples is consistent.

### No Significant Hazards Analysis

10 CFR 50.92 states that a proposed amendment involves no significant hazards considerations if operation in accordance with the proposed amendment would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or

2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or

3) Involve a significant reduction in the margin of safety.

This proposed TS amendment will not increase the probability or consequences of an accident which has been previously evaluated. This change makes no physical changes to the plant or operating procedures. This change merely clarifies the required laboratory testing requirements.

Since there is no change to the plant or operating procedures no new or different accident from any previously evaluated is created.

This change does not involve a significant reduction in the margin of safety. Because System operation is the same no revision to the On or Offsite Dose analysis is required and therefore the margin between the current dose analysis and 10CFR100 is not affected.

#### Environmental Impact Statement

The Proposed Technical Specification change has been reviewed against the criteria of 10 CFR 51.22 for environmental considerations. As shown above, the proposed change does not involve significant hazards considerations nor increase individual or cumulative occupational radiation exposure. Based on this, the proposed amendment meets the criteria given in 10CFR 51.22(c)(9) for categorical exclusion from the requirements for an Environmental Impact Statement.