

February 28, 2020

Docket Nos.: 52-025
52-026

ND-20-0122
10 CFR 50.90

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Request for License Amendment:
Main Control Room Emergency Habitability System (VES) Pressure Regulating Valve
and Source Range Neutron Flux Doubling Surveillance Changes, and Other
Miscellaneous Technical Specification Changes (LAR-20-002)

Ladies and Gentlemen:

Pursuant to 10 CFR 52.98(c) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) requests an amendment to the combined licenses (COLs) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 (License Numbers NPF-91 and NPF-92, respectively). The requested amendment proposes changes to COL Appendix A, Technical Specifications (TS).

The license amendment request (LAR) proposes changes to the following COL Appendix A TS:

- A. Surveillance Requirement (SR) 3.7.6.3 for the Main Control Room Emergency Habitability System (VES) operation, Frequency is changed from "31 days" to "31 days on a STAGGERED TEST BASIS." In conjunction with this change, SR 3.7.6.9 verifying the self-contained pressure regulating valve in each VES air delivery flow path is operable in accordance with the Inservice Testing Program (IST) is deleted.
- B. SR 3.3.8.2 (Channel Calibration) and SR 3.3.8.3 (Engineered Safety Feature [ESF] Response Time) is revised to include a Note excluding neutron detectors.
- C. Administrative Control TS 5.5.3, Inservice Testing Program, is revised to replace existing detail with reference to fulfilling the requirements of 10 CFR 50.55a(f).
- D. TS 5.5.9, System Level OPERABILITY Testing Program, is editorially revised for appropriate wording consistency and appropriate reference to the Updated Final Safety Analysis Report (UFSAR) applicable section.
- E. TS 3.4.9 Applicability Note 2 is revised to replace "RTP > 20%" (where "RTP" is defined as "RATED THERMAL POWER") with "THERMAL POWER > 20% RTP."

These changes were previously discussed with the NRC Staff at a public pre-submittal meeting on February 20, 2020 (ADAMS Accession Number ML20010E827).

Enclosure 1 provides the description, technical evaluation, regulatory evaluation (including the Significant Hazards Consideration Determination) and environmental considerations for the proposed changes.

Enclosure 2 identifies the requested changes and provides markups depicting the requested changes to the VEGP Units 3 and 4 licensing basis documents.

Enclosure 3 provides the information-only changes to the VEGP Units 3 and 4 Technical Specifications Bases document.

This letter contains no regulatory commitments. This letter has been reviewed and determined not to contain security-related information.

SNC requests NRC staff review and approval of this license amendment request (LAR) no later than August 28, 2020 to support the associated procedure and training updates. Delayed approval of this license amendment could result in a delay in training updates and subsequent dependent activities. SNC expects to implement the proposed amendment within 30 days of approval of the LAR.

In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia by transmitting a copy of this letter and its enclosures to the designated State Official.

Should you have any questions, please contact Ms. Stephanie Agee at (205) 992-7556.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 28th of February 2020.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "B. H. Whitley", is written over a solid horizontal line.

Brian H. Whitley
Director, Regulatory Affairs
Southern Nuclear Operating Company

- Enclosures
- 1) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Request for License Amendment: Main Control Room Emergency Habitability System (VES) Pressure Regulating Valve and Source Range Neutron Flux Doubling Surveillance Changes, and Other Miscellaneous Technical Specification Changes (LAR-20-002)
 - 2) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Proposed Changes to Licensing Basis Documents (LAR-20-002)
 - 3) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Conforming Changes to the Technical Specifications Bases (For Information Only) (LAR-20-002)

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Southern Nuclear Operating Company

**ND-20-0122
Enclosure 1**

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Request for License Amendment:
Main Control Room Emergency Habitability System (VES) Pressure Regulating Valve and
Source Range Neutron Flux Doubling Surveillance Changes, and Other Miscellaneous
Technical Specification Changes
(LAR-20-002)**

(Enclosure 1 consists of 15 pages, including this cover page.)

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Enclosure 1

Request for License Amendment: VES Pressure Regulating Valve and Source Range Neutron Flux Doubling Surveillance Changes, and Other Miscellaneous Technical Specification Changes (LAR-20-002)

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Request for License Amendment: VES Pressure Regulating Valve and Source Range Neutron Flux Doubling Surveillance Changes, and Other Miscellaneous Technical Specification Changes (LAR-20-002)

Pursuant to 10 CFR 52.98(c) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) hereby requests an amendment to Combined License (COL) Nos. NPF-91 and NPF-92 for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, respectively.

1. SUMMARY DESCRIPTION

The license amendment request (LAR) would revise the following COL Appendix A, Technical Specifications (TS):

- A. Surveillance Requirement (SR) 3.7.6.3 for the Main Control Room Emergency Habitability System (VES) operation, Frequency is changed from "31 days" to "31 days on a STAGGERED TEST BASIS." In conjunction with this change, SR 3.7.6.9 verifying the self-contained pressure regulating valve in each VES air delivery flow path is operable in accordance with the Inservice Testing Program (IST) is deleted.
- B. SR 3.3.8.2 (Channel Calibration) and SR 3.3.8.3 (Engineered Safety Feature [ESF] Response Time) is revised to include a Note excluding neutron detectors.
- C. Administrative Control TS 5.5.3, Inservice Testing Program, is revised to replace existing detail with reference to fulfilling the requirements of 10 CFR 50.55a(f).
- D. TS 5.5.9, System Level OPERABILITY Testing Program, is editorially revised for appropriate wording consistency and appropriate reference to the Updated Final Safety Analysis Report (UFSAR) applicable section.
- E. TS 3.4.9 Applicability Note 2 is revised to replace "RTP > 20%" (where "RTP" is defined as "RATED THERMAL POWER") with "THERMAL POWER > 20% RTP."

2. DETAILED DESCRIPTION and TECHNICAL EVALUATION

- A. As discussed in Updated Final Safety Analysis Report (UFSAR) Section 6.4, the VES is capable of maintaining the main control room (MCR) environment for prolonged occupancy throughout the duration of the postulated accidents that require protection from the release of radioactivity. The VES air storage tanks are sized to deliver the pressurization air flow to the main control room for 72 hours. Flow from the air storage tanks induces flow through the VES filtration unit of at least 600 cfm into the passive air filtration line.

The VES compressed air supply contains a set of storage tanks connected to a main air delivery line (with pressure regulating valve VES-V002A in line with parallel air delivery isolation valves VES-V005A/B) and an alternate air delivery line (with pressure regulating valve VES-V002B and alternate air delivery isolation valve VES-V001). In the event of insufficient or excessive flow in the main delivery line, the main delivery line is isolated, and the alternate delivery line is manually actuated. The alternate delivery line contains the same components as the main delivery line with the exception of the remotely operated isolation valves, and thus is capable of supplying compressed air to the MCR pressure boundary at the required air flowrate.

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The VES nominally provides 65 scfm of ventilation air to the main control room from the compressed air storage tanks. A minimum of 60 scfm of supplied ventilation flow is sufficient to induce a filtration flow of at least 600 cfm via an eductor located inside the main control room envelope. This ventilation flow is also sufficient to pressurize the control room to at least positive 1/8-inch water gauge differential pressure with respect to the surrounding areas.

Technical Specifications 3.7.6, Main Control Room Emergency Habitability System (VES), Surveillance SR 3.7.6.9 requires verification that the self-contained pressure regulating valve in each VES air delivery flow path is OPERABLE at a Frequency "In accordance with the Inservice Testing program." However, test requirements for these pressure regulating valves are not addressed by the Inservice Testing Program requirements of American Society of Mechanical Engineers (ASME) Operations and Maintenance (OM). As discussed in the AP1000 Final Safety Evaluation Report (FSER) [ML112061231] the AP1000 Design Control Document (DCD) was revised to appropriately address the testing requirements for the pressure regulating valves. DCD Table 3.9-16 was revised to reflect quarterly testing for these valves with specific testing clarification provided in Note 38. This DCD change is also captured as part of the VEGP Units 3 and 4 plant-specific Updated Final Safety Analysis Report (UFSAR). As stated in the NRC FSER, Supplement 2, Section 3.9.6.1:

Note 38 applies to main control room emergency habitability system (VES) pressure regulating valves that are exempt from the ASME OM Code, but the applicant stated it would revise the note in Table 3.9-16 to clarify the testing for these valves. As a result, Revision 17 to the AP1000 DCD, Section 3.9.6 modifies Note 38 to state exercise stroke tests for the VES pressure regulating valves will consist of a pressure drop test across the valve using the downstream test connection to ensure adequate testing of the valves. The staff finds the applicant's response to RAI-SRP3.9.6-CIB1-12, and Revision 17 to the AP1000 DCD, Section 3.9.6 adequately clarify the testing for the valves described in the applicable notes in Table 3.9-16 discussed in this RAI to be consistent with the ASME OM Code and the NRC regulations.

At the time of this change, while it was recognized that the valves were exempt from the ASME OM Code, the TS Surveillance (currently SR 3.7.6.9) was not revised to remove the reference to testing in accordance with the IST Program. This amendment request proposes to delete SR 3.7.6.9, which requires testing of the pressure regulating valves in accordance with the IST Program, and renumber the subsequent Surveillances.

In conjunction with the change to delete SR 3.7.6.9, existing Surveillance (SR 3.7.6.3), which requires monthly operation of VES for ≥ 15 minutes, is proposed to be revised. This monthly VES operation necessarily requires operation of one of the two pressure regulating valves (VES-V002A in the automatically actuated main air delivery line and VES-V002B in the manually actuated alternate air delivery line), which each require quarterly testing (per UFSAR Table 3.9-16 and Note 38). Additionally, the main air delivery line has two parallel air delivery flow paths via automatically actuated isolation valves (VES-V005A/B) that are also required to be exercised quarterly. Staggering these three air delivery flow paths (i.e., one flow path each month) will result in at least quarterly exercising of each air delivery valve. As such, SR 3.7.6.3 Frequency is proposed to be revised from "31 days" to "31 days

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on a STAGGERED TEST BASIS” to clarify the requirement to exercise each air delivery valve. The effect of deleting SR 3.7.6.9 and revising SR 3.7.6.3 provides a clearer Surveillance presentation consistent with the requirements shown in UFSAR Table 3.9-16 without inappropriately referencing ASME OM IST testing. The actual testing requirements remain unchanged. Furthermore, the proposed changes do not result in a change to the VES design or radiological dose rates to the MCR operators for the duration of a DBA.

- B. The Protection and Safety Monitoring System (PMS) is a digital Instrumentation and Control (I&C) system which detects off-nominal conditions and actuates the appropriate safety-related functions necessary to achieve and maintain the plant in a safe shutdown condition. The PMS controls safety-related components in the plant that are operated from the main control room or remote shutdown workstation. In addition, the PMS provides the equipment necessary to monitor the plant safety-related functions during and following an accident.

The Nuclear Instrumentation System (NIS) is a subsystem of the PMS that measures neutron leakage from the reactor core over the full range of reactor power by using source range (SR), intermediate range (IR), and power range (PR) neutron detectors. The NIS consists of four identical independent divisions of equipment, each associated with one PMS division. Each division performs signal processing on inputs from its associated SR, IR, and PR detectors.

The NIS provides protection against unplanned reactor criticality resulting from inadvertent boron dilution of the Reactor Coolant System (RCS). The NIS performs this function by comparing the current SR neutron count rate with the SR neutron count rate at an earlier time. If the ratio of the current average neutron count rate to the earlier average count rate is greater than a preset value, then a partial trip is generated in the division. This is referred to as flux doubling. On a coincidence of excessively increasing SR neutron flux in two of the four divisions, an Engineered Safety Feature Actuation System (ESFAS) protection function is initiated to isolate the boron dilution flow path. This ESFAS protection function is discussed in UFSAR Section 7.3.1.2.14.

The NIS SR neutron detectors are addressed in multiple TS, including TS 3.3.2, Reactor Trip System (RTS) Source Range Instrumentation, TS 3.3.8, Engineered Safety Feature Actuation System (ESFAS) Instrumentation (see Function 17, Source Range Neutron Flux Doubling), and TS 3.9.3, Nuclear Instrumentation. These TS have Surveillances for channel calibration (SR 3.3.2.2, SR 3.3.8.2, and SR 3.9.3.1) and Surveillances for response time testing (SR 3.3.2.3 and SR 3.3.8.3). The Surveillances in TS 3.3.2 and 3.9.3 are provided with a Note exception that excludes neutron detectors from both the channel calibration and response time testing. This same exception for neutron detectors is also applied to PR and IR channels in TS 3.3.1, Reactor Trip System (RTS) Instrumentation, and TS 3.3.3, Reactor Trip System (RTS) Intermediate Range Instrumentation, respectively. Similarly, in the Standard Technical Specifications for Westinghouse Plants, NUREG-1431, Revision 4.0 (ML12100A222), the exception for neutron detectors is applied consistently for SR, IR and PR channels. However, in the development of the AP1000 Generic TS, these Note exclusions were inadvertently omitted from being applied in TS 3.3.8 for the SR flux doubling function.

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The TS 3.3.2 and 3.9.3 Bases for SR channel calibration attribute the exception for the calibration based on the calibration consisting of obtaining the detector plateau or preamp discriminator curves, evaluating those curves, and comparing the curves to the manufacturer's data. These Bases also attribute the exception for the response time testing because of the difficulty in generating an appropriate detector input signal. Excluding the detectors is acceptable because the principles of detector operation provide a virtually instantaneous response. The proposed change does not change the conditions under which the flux doubling boron dilution isolation function performs its design function or the manner in which the design function is performed.

This amendment request proposes to add neutron detector exclusion Notes to SR 3.3.8.2 and SR 3.3.8.3 for consistency with other SR neutron flux Surveillances. Conforming TS Bases changes will be made in accordance with the TS Bases Control Program during the implementation of the license amendment.

- C. The intended purpose of TS 5.5.3, Inservice Testing Program, was to provide a table defining some of the IST frequencies and to provide controls for inservice testing of American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components including specific testing frequencies and to provide exceptions to these frequencies based on Surveillance Requirement (SR) 3.0.2 and SR 3.0.3. However, restructuring TS chapters during the development of the Improved Standard Technical Specifications resulted in unintended consequences when SR 3.0.2 and SR 3.0.3 provisions were made applicable to the IST program.

The proposed change eliminates the existing detail in TS Section 5.5.3, Inservice Testing Program (including references to SR 3.0.2 and SR 3.0.3), in order to remove requirements duplicated in, or in conflict with, American Society of Mechanical Engineers (ASME) Code for Operations and Maintenance of Nuclear Power Plants (OM Code), including Code Case OMN-20, "Inservice Test Frequency," which is approved for use per 10 CFR 50.55a(a)(1)(iii)(G). The detail in TS 5.5.3 is replaced with "The Inservice Testing Program is the licensee program that fulfills the requirements of 10 CFR 50.55a(f)." The proposed change to the TS Administrative Controls is consistent with the intent of the change reflected in TSTF-545 Revision 3, "TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5 Testing."

1. Applicability of Published Safety Evaluation

SNC has reviewed the model safety evaluation provided to the Technical Specifications Task Force (TSTF) in a letter, "Final Model Safety Evaluation of Technical Specifications Task Force Traveler TSTF-545, Revision 3, TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5 Testing," dated December 11, 2015 (NRC ADAMS Accession No. ML15317A071). The review included a review of the NRC staff's evaluation as well as the information provided in TSTF-545. SNC has concluded that the justifications presented in TSTF-545, as well as the model safety evaluation prepared by the NRC staff, are applicable to requested VEGP Units 3 and 4 amendment (with minor variations presented below) and justify the requested amendment for incorporation of the changes to the VEGP Units 3 and 4 TS.

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2. Variations

SNC is proposing an editorial variation from the TS changes described in TSTF-545. TSTF-545 added a new defined term for "Inservice Testing Program" that defined it as the program that fulfills the requirements of 10 CFR 50.55a(f). SNC proposes to retain this identification of the program's scope to fulfill the requirements of 10 CFR 50.55a(f) within the existing Administrative Controls TS 5.5.3, Inservice Testing Program. This editorial difference provides significant paperwork reduction by avoiding revisions to each reference to the Inservice Test Program to reflect full capitalization that is necessitated by TS Writer's Guide conventions for defined terms. There is no functional difference in the TS requirements whether the IST Program is defined in the Definition Section or within the Administrative Controls Section. This variation retains Administrative Controls section numbering and appropriate capitalization of "Inservice Testing Program" as currently utilized throughout the TS and TS Bases. Although the variation is insignificant in terms of any actual changes to how the plant operates, the change maintains consistency throughout the TS, which is functionally equivalent to the TSTF proposed addition of a defined term.

Bases changes conforming to TSTF-545 clarifications, as supported by the NRC Model Safety Evaluation Attachment, as shown in Enclosure 3 for information only will be made in accordance with the Bases Control Program during the implementation of the license amendment.

- D. As discussed in UFSAR subsection 3.9.6, VEGP tests include periodic system level tests and inspections that demonstrate the capability of safety-related features to perform their safety-related functions such as passing flow or transferring heat. For this system level testing, the test and inspection frequency is once every 10 years. Staggering of the tests of redundant components is not required. These tests may be performed in conjunction with inservice tests conducted to exercise check valves or to perform power-operated valve operability tests. Alternate means of performing these tests and inspections that provide equivalent demonstration may be developed in the inservice test program. UFSAR Table 3.9-17 identifies the system level tests. These system level tests are not governed by the ASME OM Code.

TS 5.5.9, System Level OPERABILITY Testing Program, provides the TS reference to these tests as called for in individual Surveillances. The specific wording in the second sentence of TS 5.5.9 contains a misleading reference to "System Level Inservice Tests" [emphasis added]. The appropriate wording for this sentence in TS 5.5.9 is proposed to be revised to reflect the actual title of Table 3.9-17 as "System Level OPERABILITY Test Requirements" [emphasis added]. Additionally, TS 5.5.9 states that these tests are specified in FSAR Section 3.9.6 and FSAR Table 3.9-17; however, the tests are only found in Table 3.9-17. Therefore, this change proposes to also delete "FSAR Section 3.9.6 and..." These changes are editorial corrections to align the TS presentation with the actual UFSAR requirements being imposed.

- E. TS 3.4.9, RCS Leakage Detection Instrumentation, Applicability is provided with two Notes. Note 2 states: "The containment atmosphere F18 particulate monitor is only required to be OPERABLE in MODE 1 with RTP > 20%." The "RTP" acronym is defined in TS Section 1.1

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as "Rated Thermal Power" and that it "shall be a total reactor core heat transfer rate to the reactor coolant of 3400 MWt." As such, the use of "RTP > 20%" in the Applicability Note is inappropriate as RTP is a fixed value. The defined term "THERMAL POWER" is "the total reactor core heat transfer rate to the reactor coolant" and can be expressed as a percentage of RTP. As stated in the TS 3.4.9 Bases for this F18 monitor, "By the time reactor power has reached 20%, the concentration of F18 in the reactor coolant is great enough that its presence in the containment atmosphere due to LEAKAGE would be detectable." As such, the TS 3.4.9 Applicability Note is proposed to be revised to reflect the intended "THERMAL POWER > 20% RTP." The proposed change to appropriately and consistently identify the applicable power level is an editorial correction.

Proposed Licensing Basis Changes

The following changes to the VEGP 3 and 4 COL Appendix A, Technical Specifications are proposed:

- A. TS 3.7.6, Main Control Room Emergency Habitability System (VES):
 - SR 3.7.6.3 Frequency is changed from "31 days" to "31 days on a STAGGERED TEST BASIS."
 - SR 3.7.6.9 is deleted.
 - SR 3.7.6.10, SR 3.7.6.11, SR 3.7.6.12, and SR 3.7.6.13 are renumbered to SR 3.7.6.9, SR 3.7.6.10, SR 3.7.6.11, and SR 3.7.6.12, respectively.
- B. TS 3.3.8, Engineered Safety Feature Actuation System (ESFAS) Instrumentation
 - SR 3.3.8.2 is revised to add Note 2 stating: "Neutron detectors are excluded from CHANNEL CALIBRATION."
 - SR 3.3.8.3 is revised to add Note 2 stating: "Neutron detectors are excluded from response time testing."
- C. TS 5.5.3, Inservice Testing Program, is revised to replace existing detail with "The Inservice Testing Program is the licensee program that fulfills the requirements of 10 CFR 50.55a(f)."
- D. TS 5.5.9, System Level OPERABILITY Testing Program, is revised to replace "The System Level Inservice Tests specified in FSAR Section 3.9.6 and FSAR Table 3.9-17..." with "The System Level OPERABILITY Test Requirements specified in FSAR Table 3.9-17 ..."
- E. TS 3.4.9 Applicability Note 2 is revised to replace "RTP > 20%" with "THERMAL POWER > 20% RTP."

Conforming TS Bases changes will be incorporated following NRC approval of the license amendment request in accordance with TS 5.5.6, Technical Specification Bases Control Program. The markups showing these changes are provided in Enclosure 3 for information only.

Summary

The proposed changes would revise COL Appendix A TS information concerning appropriate Surveillance testing, eliminating potentially conflicting requirements more appropriately governed by 10 CFR 50.55a(f), and clarifying editorial changes consistent with the requirements as described elsewhere in the TS and in the Updated Final Safety Analysis Report (UFSAR). The proposed changes do not adversely affect the design functions of any system, subsystem, or component as described in the UFSAR.

Additionally, the proposed changes do not adversely affect any safety related equipment or function, design function, radioactive material barrier, or safety analysis.

3. TECHNICAL EVALUATION (Included in Section 2)

4. REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

A review was performed to determine which of the regulations and industry guidance documents discussed above are specifically applicable to the changes described in Section 1. It is concluded that the proposed changes adhere to those requirements or, if not directly applicable, satisfy the intent of requirement.

These regulations include the following:

10 CFR 50.36, Technical specifications, (c) Technical specifications will include items in the following categories: (1) Safety limits, limiting safety system settings, and limiting control settings. (2) Limiting conditions for operation. (3) Surveillance Requirements. The safety limits, the limiting safety system settings, and limiting control settings are not affected with this proposed amendment. In addition, the proposed changes to the plant specific Technical Specifications limiting conditions for operation, applicability, actions, and surveillance requirements as justified by this license amendment request continue to meet the scope required by 10 CFR 50.36(c).

10 CFR 52.98(c) requires NRC approval for any modification to, addition to, or deletion from the terms and conditions of a Combined License (COL). This activity involves changes to plant-specific Technical Specifications (COL Appendix A). An additional change is proposed to the UFSAR to clarify that ASME OM Code testing does not apply to the VES pressure regulating valves involved with the TS SR 3.7.6.9 change. Therefore, this activity requires a proposed amendment to the COL.

10 CFR 52, Appendix D, Section VIII.B.5.a allows an applicant or licensee who references this appendix to depart from Tier 2 information, without prior NRC approval, unless the proposed departure involves a change to or departure from Tier 1 information, Tier 2* information, or the Technical Specifications, or requires a license amendment under paragraphs B.5.b or B.5.c of the section. The proposed changes to UFSAR (plant-specific Design Control Document)

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Table 3.9-16 involve a revision to COL Appendix A Technical Specifications information. Therefore, NRC approval is required for the Tier 2 and the Technical Specifications changes.

10 CFR 52, Appendix D, VIII.C.6 states that after issuance of a license, "Changes to the plant-specific TS (Technical Specifications) will be treated as license amendments under 10 CFR 50.90." 10 CFR 50.90 addresses the applications for amendments of licenses, construction permits and early site permits. As discussed above, changes to plant-specific Technical Specifications (COL Appendix A) are requested. Therefore, NRC approval is required for these plant-specific TS changes.

The proposed changes have been evaluated to determine whether applicable 10 CFR 50 Appendix A General Design Criteria (GDC) continue to be met. It was determined that the proposed changes do not affect conformance with the GDC differently than described in the plant-specific DCD or UFSAR, as described below.

- 10 CFR Part 50, Appendix A, General Design Criterion 13, *Instrumentation and control*, requires that instrumentation shall be provided to monitor variables and systems over their anticipated ranges for normal operation, for anticipated operational occurrences, and for accident conditions as appropriate to assure adequate safety, including those variables and systems that can affect the fission process, the integrity of the reactor core, the reactor coolant pressure boundary, and the containment and its associated systems. Appropriate controls shall be provided to maintain these variables and systems within prescribed operating ranges. The proposed change does not change the conditions under which the flux doubling boron dilution isolation function performs its design function or the manner in which the design function is performed.
- 10 CFR 50 Appendix A, General Design Criteria 19, *Control room*, states: "A control room shall be provided from which actions can be taken to operate the nuclear power unit safely under normal conditions and to maintain it in a safe condition under accident conditions, including loss-of-coolant accidents. Adequate radiation protection shall be provided to permit access and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of 0.05 Sv (5 rem) total effective dose equivalent (TEDE) as defined in § 50.2 for the duration of the accident." The proposed changes do not result in a change to the VES design or radiological dose rates to the MCR operators for the duration of a DBA. The MCRE remains habitable for the duration of a DBA, thus this criterion remains satisfied.
- 10 CFR Part 50, Appendix A, General Design Criteria 21, *"Protection System Reliability and Testability"* - requires, in part, that the protection system be designed to permit its periodic testing during reactor operation, including a capability to test channels independently to determine failures and losses of redundancy that may have occurred. This activity does not propose any change to the PMS design and therefore, there is no effect on the capability for periodic testing during reactor power operation. This activity continues to impose periodic performance of response time testing and channel calibrations consistent with current requirements. Therefore, compliance with GDC 21 is not changed.

Request for License Amendment: VES Pressure Regulating Valve and Source Range Neutron Flux Doubling Surveillance Changes, and Other Miscellaneous Technical Specification Changes (LAR-20-002)

- Criterion XI, "Test Control," of 10 CFR 50 Appendix B – Criterion XI requires, in part, that a test program be established to ensure that all testing, including operational testing required to demonstrate that systems and components will perform satisfactorily in service, is identified and performed in accordance with written test procedures. The AP1000 surveillance test program continues to meet this requirement. The changes to exclude neutron detectors from channel calibration and response time testing are consistent with existing notes on these same detectors in other Technical Specifications. Therefore, compliance with Criterion XI is not changed.

4.2 Precedent

No precedents are identified.

4.3 Significant Hazards Consideration

Southern Nuclear Operating Company (SNC) is requesting an amendment to Combined License (COL) Nos. NPF-91 and NPF-92 for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, respectively. The proposed changes would change the COL Appendix A TS as described above.

An evaluation to determine whether or not a significant hazards consideration is involved with the proposed amendment was completed by focusing on the three standards set forth in 10 CFR 50.92(c), "Issuance of amendment," as discussed below.

- The proposed change deletes SR 3.7.6.9, which requires testing of the pressure regulating valves in accordance with the ASME OM Inservice Testing Program. In conjunction with this change, existing Surveillance (SR 3.7.6.3) is proposed to be revised. The effect of deleting SR 3.7.6.9 and revising SR 3.7.6.3 provides a clearer Surveillance presentation consistent with the requirements shown in UFSAR Table 3.9-16 without inappropriately referencing ASME OM IST testing. The actual testing requirements remain unchanged.
- The proposed change adds Source Range neutron flux detector exclusion Notes to channel calibration SR 3.3.8.2 and response time test SR 3.3.8.3 for consistency with other Source Range neutron flux Surveillances.
- The proposed change revises the existing detail in TS Section 5.5.3, Inservice Testing Program, Technical Specifications (TS) in order to remove requirements duplicated in American Society of Mechanical Engineers (ASME) Code for Operations and Maintenance of Nuclear Power Plants (OM Code), Case OMN-20, "Inservice Test Frequency," which is approved for use. The detail in TS 5.5.3 is replaced with "This program provides controls that fulfill the requirements of 10 CFR 50.55a(f)."
- The proposed changes to TS 5.5.9, System Level OPERABILITY Testing Program, provide clearer reference to the TS tests as called for UFSAR Table 3.9-17. These changes are editorial corrections to align the TS presentation with the actual UFSAR requirements being imposed.
- The proposed change to TS 3.4.9, RCS Leakage Detection Instrumentation, Applicability Note 2 that replaces "RTP > 20%" with "THERMAL POWER > 20% RTP" is an editorial correction.

4.3.1 Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed changes do not affect the safety limits as described in the plant-specific Technical Specifications. In addition, the limiting safety system settings and limiting control settings continue to be met with the proposed changes to the plant-specific Technical Specifications surveillance requirements. The proposed changes do not adversely affect the operation of any systems or equipment that initiate an analyzed accident or alter any structures, systems, and components (SSCs) accident initiator or initiating sequence of events and continue to maintain the initial conditions and operating limits required by the accident analysis, and the analyses of normal operation and anticipated operational occurrences. Therefore, the proposed changes do not result in any increase in probability of an analyzed accident occurring.

The proposed changes do not involve a change to any mitigation sequence or the predicted radiological releases due to postulated accident conditions, thus, the consequences of the accidents evaluated in the UFSAR are not affected.

Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

4.3.2 Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed changes do not affect the safety limits as described in the plant-specific Technical Specifications. In addition, the limiting safety system settings and limiting control settings continue to be met with the proposed changes to the plant-specific Technical Specifications limiting conditions for operation, applicability, actions, and surveillance requirements. The proposed changes do not affect the operation of any systems or equipment that may initiate a new or different kind of accident or alter any SSC such that a new accident initiator or initiating sequence of events is created.

These proposed changes do not adversely affect any other SSC design functions or methods of operation in a manner that results in a new failure mode, malfunction, or sequence of events that affect safety-related or nonsafety-related equipment. Therefore, this activity does not allow for a new fission product release path, result in a new fission product barrier failure mode, or create a new sequence of events that results in significant fuel cladding failures.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

4.3.3 Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed changes do not affect the safety limits as described in the plant-specific Technical Specifications. In addition, the limiting safety system settings and limiting control settings continue to be met with the proposed changes to the plant-specific Technical Specifications limiting conditions for operation, applicability, actions, and surveillance requirements. The proposed changes do not affect the initial conditions and operating limits required by the accident analysis, and the analyses of normal operation and anticipated operational occurrences, so that the acceptance limits specified in the UFSAR are not exceeded. The proposed changes satisfy the same safety functions in accordance with the same requirements as stated in the UFSAR. These changes do not adversely affect any design code, function, design analysis, safety analysis input or result, or design/safety margin.

No safety analysis or design basis acceptance limit/criterion is challenged or exceeded by the proposed changes, and no margin of safety is reduced.

Therefore, the proposed amendment does not involve a significant reduction in a margin of safety.

Based on the above, it is concluded that the proposed amendment does not involve a 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.

4.4 Conclusions

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission’s regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public. Therefore, it is concluded that the requested amendment does not involve a 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.

5. ENVIRONMENTAL CONSIDERATIONS

The proposed changes would change to the COL Appendix A TS as described in Section 2 above.

A review has determined that the proposed changes require an amendment to the COL. However, a review of the anticipated construction and operational effects of the requested amendment has determined that the requested amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9), in that:

(i) *There is no significant hazards consideration.*

As documented in Section 4.3, Significant Hazards Consideration, of this license amendment request, an evaluation was completed to determine whether or not a significant hazards consideration is involved by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment." The Significant Hazards Consideration evaluation determined that (1) the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated; (2) the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated; and (3) the proposed amendment does not involve a significant reduction in a margin of safety. Therefore, it is concluded that the proposed amendment does not involve a 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.

(ii) *There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.*

The proposed changes are unrelated to any aspect of plant construction or operation that would introduce any change to effluent types (e.g., effluents containing chemicals or biocides, sanitary system effluents, and other effluents) or affect any plant radiological or non-radiological effluent release quantities. Furthermore, the proposed changes do not affect any effluent release path or diminish the functionality of any design or operational features that are credited with controlling the release of effluents during plant operation. Therefore, it is concluded that the proposed amendment does not involve a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite.

(iii) *There is no significant increase in individual or cumulative occupational radiation exposure.*

The proposed change in the requested amendment does not affect the shielding capability of, or alter any walls, floors, or other structures that provide shielding. Plant radiation zones and controls under 10 CFR 20 preclude a significant increase in occupational radiation exposure. Furthermore, eliminating Response Time testing requirements for the RCP speed sensor results in a reduction of radiation exposure to plant workers. Eliminating unnecessary testing on these sensors reduces exposures consistent with the guidelines of As Low As (Is) Reasonably Achievable (ALARA). Therefore, the proposed amendment does not involve a significant increase in individual or cumulative occupational radiation exposure.

ND-20-0122

Enclosure 1

Request for License Amendment: VES Pressure Regulating Valve and Source Range Neutron Flux Doubling Surveillance Changes, and Other Miscellaneous Technical Specification Changes (LAR-20-002)

Based on the above review of the proposed amendment, it has been determined that anticipated construction and operational effects of the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in the individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criteria 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 amendment.

6. REFERENCES

None.

Southern Nuclear Operating Company

**ND-20-0122
Enclosure 2**

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Proposed Changes to Licensing Basis Documents
(LAR-20-002)**

**Insertions Denoted by Blue Underline and Deletions by ~~Red Strikethrough~~
Omitted text is identified by three asterisks (* * *)**

(Enclosure 2 consists of five pages, including this cover page.)

Technical Specification 3.3.8, Engineered Safety Feature Actuation System (ESFAS) Instrumentation:

* * *

SR 3.3.8.2	<p>-----</p> <p style="text-align: center;">- NOTES -</p> <p>1. This surveillance shall include verification that the time constants are adjusted to within limits.</p> <p>2. <u>Neutron detectors are excluded from CHANNEL CALIBRATION.</u></p> <p>-----</p> <p>Perform CHANNEL CALIBRATION in accordance with Setpoint Program.</p>	24 months
SR 3.3.8.3	<p>-----</p> <p style="text-align: center;">- NOTES -</p> <p>1. Not applicable to Function 1.a.</p> <p>2. <u>Neutron detectors are excluded from response time testing.</u></p> <p>-----</p> <p>Verify ESF RESPONSE TIME is within limit.</p>	24 months on a STAGGERED TEST BASIS

Technical Specification 3.4.9, RCS Leakage Detection Instrumentation:

* * *

<p>-----</p> <p style="text-align: center;">- NOTES -</p> <p>1. * * *</p> <p>2. The containment atmosphere F18 particulate monitor is only required to be OPERABLE in MODE 1 with RTP <u>THERMAL POWER</u> > 20% <u>RTP</u>.</p> <p>-----</p>
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Technical Specification 3.7.6, Main Control Room Emergency Habitability System (VES):

* * *

SR 3.7.6.3	Operate VES for \geq 15 minutes.	31 days <u>on a STAGGERED TEST BASIS</u>
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* * *

SR 3.7.6.9	Verify the self-contained pressure-regulating valve in each VES air-delivery flow path is OPERABLE.	In accordance with the Inservice Testing Program
SR 3.7.6. 40 <u>9</u>	* * *	* * *
SR 3.7.6. 41 <u>10</u>	* * *	* * *
SR 3.7.6. 42 <u>11</u>	* * *	* * *
SR 3.7.6. 43 <u>12</u>	* * *	* * *

Technical Specification 5.5.3, Inservice Testing Program:

5.5.3 Inservice Testing Program

The Inservice Testing Program is the licensee program that fulfills the requirements of 10 CFR 50.55a(f). ~~This program provides control for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports. The program shall include the following:~~

- ~~a. Testing frequencies applicable to the ASME Code for Operations and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as follows:~~

ASME OM Code and applicable Addenda Terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
---	---

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 and other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities;~~
- ~~c. The provisions of SR 3.0.3 are applicable to inservice testing activities;~~
- ~~d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.~~

Technical Specification 5.5.9, System Level OPERABILITY Testing Program:

5.5.9 System Level OPERABILITY Testing Program

The System Level OPERABILITY Testing Program provides requirements for performance tests of passive systems. The System Level [OPERABILITY Test Requirements](#) ~~Inservice Tests~~ specified in ~~FSAR Section 3.9.6 and~~ FSAR Table 3.9-17 apply when specified by individual Surveillance Requirements.

* * *

Southern Nuclear Operating Company

**ND-20-0122
Enclosure 3**

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Conforming Changes to the Technical Specifications Bases (For Information Only)
(LAR-20-002)**

**Insertions Denoted by Blue Underline and Deletions by ~~Red Strikethrough~~
Omitted text is identified by three asterisks (* * *)**

(Enclosure 3 consists of five pages, including this cover page.)

**Technical Specifications Bases B 3.0, SURVEILLANCE REQUIREMENT (SR)
APPLICABILITY**

BASES

SRs SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.
[SR 3.0.2 and SR 3.0.3 apply in Chapter 5 only when invoked by a Chapter 5 Specification.](#)

* * *

SR 3.0.2

* * *

SR 3.0.2 permits a 25% extension of the interval specified in the Frequency. This extension facilitates Surveillance scheduling and considers plant operating conditions that may not be suitable for conducting the Surveillance (e.g., transient conditions or other ongoing Surveillance or maintenance activities).

[When a Section 5.5, "Programs and Manuals," specification states that the provisions of SR 3.0.2 are applicable, a 25% extension of the testing interval, whether stated in the specification or incorporated by reference, is permitted.](#)

* * * ~~An e~~[Examples](#) of where SR 3.0.2 does not apply ~~are is in~~ the Containment Leakage Rate Testing Program [required by 10 CFR 50, Appendix J, and the inservice testing of pumps and valves in accordance with applicable American Society of Mechanical Engineers Operation and Maintenance Code, as required by 10 CFR 50.55a.](#) ~~This~~ These programs establish~~es~~ testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot in and of themselves extend a test interval specified in the regulations [directly or by reference.](#)

SR 3.0.3

* * *

[When a Section 5.5, "Programs and Manuals," specification states that the provisions of SR 3.0.3 are applicable, it permits the flexibility to defer declaring the testing requirement not met in accordance with SR 3.0.3 when the testing has not been completed within the testing interval \(including the allowance of SR 3.0.2 if invoked by the Section 5.5 specification\).](#)

Technical Specifications Bases B 3.3.8, Engineered Safety Feature Actuation System (ESFAS) Instrumentation:

* * *

SURVEILLANCE REQUIREMENTS

* * *

SR 3.3.8.2

* * *

This Surveillance Requirement is modified by ~~a two~~ [Notes](#). ~~The~~ [Note 1](#) states that this test should include verification that the time constants are adjusted to within limits where applicable. [Note 2 states that neutron detectors are excluded from the CHANNEL CALIBRATION. The CHANNEL CALIBRATION for the source range neutron flux monitors consisting of obtaining the detector plateau or preamp discriminator curves, evaluating those curves, and comparing the curves to the manufacturer's data.](#)

* * *

SR 3.3.8.3

* * *

The Surveillance Requirement is modified by ~~a two~~ [Notes](#). ~~Not~~ [Note 1 states that it is not](#) applicable to Function 1.a for Containment Pressure - Low. The exception is appropriate because the Containment Pressure - Low signal provides an interlock function for the containment vacuum relief valves manual initiation function and does not directly actuate any ESF. [Note 2 exempts neutron detectors from ESF RESPONSE TIME testing. This Note is necessary because of the difficulty in generating an appropriate detector input signal. Excluding the detectors is acceptable because the principles of detector operation ensure a virtually instantaneous response.](#)

* * *

Technical Specifications Bases B 3.4.9 RCS Leakage Detection Instrumentation

BACKGROUND

* * *

The reactor coolant contains radioactivity that, when released to the containment, * * * neutron flux. By the time ~~reactor power~~ [THERMAL POWER](#) has reached 20% [RTP](#), the concentration of F18 in the reactor coolant is * * * .

APPLICABILITY

* * *

Applicability Note 2 states that the containment atmosphere F18 particulate radioactivity LEAKAGE measurement during MODE 1 is only required when ~~reactor power~~ [THERMAL POWER](#) is > 20% RTP.

Technical Specifications Bases B 3.7.6, Main Control Room Emergency Habitability System (VES)

* * *

SR 3.7.6.3

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 VES once every month provides an adequate check of the system. [This monthly VES operation requires operation of one of the two pressure regulating valves, which each require quarterly testing \(per UFSAR Table 3.9-16 and Note 38\). Additionally, the main air delivery line has two parallel air delivery flow paths via automatically actuated isolation valves \(VES-V005A/B\) that are also required to be exercised quarterly. Monthly testing of the three air delivery flow paths on a STAGGERED TEST BASIS will result in at least quarterly exercising of each air delivery valve.](#) The 31 day [on a STAGGERED TEST BASIS](#) Frequency is based on the reliability of the equipment and the availability of system redundancy.

* * *

SR 3.7.6.9

~~Verification of the OPERABILITY of the self-contained pressure regulating valve in each VES air delivery flow path is required in accordance with the Inservice Testing Program. This is done to ensure that a sufficient supply of air is provided as required, and that uncontrolled air flow into the MCRE will not occur.~~

SR 3.7.6.9~~10~~

* * *

SR 3.7.6.10~~11~~

* * *

SR 3.7.6.11~~12~~

* * *

SR 3.7.6.12~~13~~

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