

ATTACHMENT I

RANCHO SECO TECHNICAL SPECIFICATIONS
(Pages affected by Proposed Amendment No. 165)

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RANCHO SECO UNIT 1
TECHNICAL SPECIFICATIONS

Limiting Conditions for Operation

165→ Bases (continued)

The interim Onsite Storage Building has a ventilation system which provides protection against radioactive airborne release. Operation of the ventilation system produces a negative pressure in the building. During operation, the ventilation exhaust flow is continuously monitored. Upon an alarm, the exhaust duct closes and the supply and exhaust fans stop, minimizing any chance of an airborne release. The monitor setpoints are set statistically high enough above background to prevent spurious alarms, yet stop potential radioactive releases when detected. Although no planned airborne radioactive releases are anticipated from this pathway, the ventilation exhaust monitor is listed as a Technical Specification instrument.

RANCHO SECO UNIT 1
TECHNICAL SPECIFICATIONS

Limiting Conditions for Operation

Table 3.16-1 (Continued)

RADIOACTIVE GASES EFFLUENT MONITORING INSTRUMENTATION

<u>Instrument</u>	<u>Minimum Number of Channels Operable</u>	<u>Action</u>
3. Radwaste Service Area Vent* (continued)		
c. Particulate Sampler	1	With the collection device inoperable, effluent releases via this pathway may continue provided continuing samples are taken and these samples are analyzed in accordance with Table 4.22-1 within 24 hours.
d. System Effluent Flow Rate Device	1	With the flow rate device inoperable, effluent releases may continue provided the flow rate used is the maximum design flow rate.
e. Sampler Flow Rate Measurement Device	1	With the flow rate device inoperable, effluent releases via this pathway may continue provided the flow rate is estimated and recorded at least once per 4 hours.
165- 4. IOS Building Vent		
a. Particulate Monitor	1	With the monitoring device inoperable, ventilation flow shall be halted or continuous particulate samples taken in accordance with Table 4.22-1E for particulate samples.

* The Radwaste Service Area Vent Monitoring System is not yet functional. This specification for this system will become effective when it is declared OPERABLE.

RANCHO SECO UNIT 1
TECHNICAL SPECIFICATIONS

Surveillance Standards

4.20 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

Surveillance Requirements

The maximum setpoints shall be determined in accordance with procedures as described in the ODCM and shall be recorded on release permits.

Each radioactive gaseous effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the INSTRUMENT CHANNEL CHECK, SOURCE CHECK, INSTRUMENT CHANNEL CALIBRATION, AND CHANNEL TEST at the frequencies shown in Table 4.20-1.

Records shall be maintained in the Process Standards of all radioactive gaseous effluent monitoring instrumentation alarm/trip setpoints. Maximum setpoints and setpoint calculations shall be available for review to ensure that the limits of Specification 3.18 are met.

Bases

The radioactive gaseous effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in gaseous effluents during actual or potential releases. The alarm/trip setpoints for these instruments shall be calculated in accordance with the methods in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. The OPERABILITY and use of this instrumentation is consistent with the requirements and General Design Criteria 60, 63, and 64 of Appendix A to 10 CFR Part 50.

The flow rates in the Reactor Building Purge Vent, Auxiliary Building Stack and Radwaste Service Area Vent are constant as they use single speed fans. The Reactor Building Purge Vent has two different flow rates, winter and summer, however administrative controls assure using the correct flow rate where applicable. The actual flow rate of the ventilation systems are periodically determined by surveillance procedures. The flow rate measurement devices are used only as flow indicating devices and not for actual measurement of flow rate. Also, as these flow rate devices must be removed from the ventilation system for the channel test, and in addition transported to the manufacturer for calibration, the frequencies have been set as shown in Table 4.20-1.

- 165- The ventilation exhaust flow rate in the Interim Onsite Storage Building is constant, as the exhaust fan is a single-speed fan. During operation, the ventilation exhaust flow is continuously monitored for particulate through an isokinetic probe. The monitor setpoints are set statistically high enough above background to prevent spurious alarms, yet stop potential radioactive releases when detected.

RANCHO SECO UNIT 1
TECHNICAL SPECIFICATIONS

Surveillance Standards

Table 4.20-1 (Continued)

<u>Instrument</u>	<u>Instrument Channel Check</u>	<u>Instrument Source Check</u>	<u>Channel Calibration</u>	<u>Channel Test</u>
3. Radwaste Service Area*				
a. Noble Gas Activity Monitor	D(1)	M	Q(2)	Q(4)
b. Iodine Sampler	W	NA	NA	NA
c. Particulate Sampler	W	NA	NA	NA
d. System Effluent Flow Rate Device	W	NA	BY	A
e. Sampler Monitor Flow Rate Measurement Device	W	NA	BY	A
165- 4. IOS Building				
a. Particulate Monitor	S	NA	R	M

* The Radwaste Service Area Monitoring System is not yet functional. The specification for this system will become effective when it is declared OPERABLE.

Table Notation

- (1) During releases via this pathway, a check shall be performed at least once per 24 hours.
- (2) The Instrument Channel Calibration for radioactivity measurement instrumentation shall be performed using one or more reference standards.
- (3) The Channel Test shall also demonstrate that automatic termination of this pathway and control room alarm annunciation occurs if any of the following conditions exist:
 - a. Instrument indicates measured levels above the alarm/trip setpoint.
 - b. Circuit failure.
 - c. Instrument indicates a downscale failure.
 - d. Instrument controls not set in operate mode.

DESCRIPTION:

Proposed Amendment No. 165 adds a radiation monitor in the Interim Onsite Storage Building (IOSB) ventilation system to Technical Specification Table 3.16-1, Radioactive Gases Effluent Monitoring Instrumentation, and associated Table 4.20-1, Radioactive Gaseous Effluent Monitoring Instrumentation Surveillance Requirements. Additionally, a discussion is added to the Bases of Technical Specification 3.16 and 4.20.

REASON FOR CHANGES:

Purpose

The Interim Onsite Storage Building (IOSB) is a facility which is constructed to house at least two and one-half years of waste consisting of solidified liquids, compactable trash, and resins.

In addition to storage use, the following activities will be performed in the IOSB, including:

1. Sorting and segregation of dry active waste,
2. Dry waste compaction (box compactor),
3. Consolidation of uncompactable waste prior to shipment,
4. Laundry inspection, survey, sorting, and storage,
5. Respiratory cleaning unit operation,
6. Decontamination of equipment and volume reduction of fixed contaminated equipment or gear,
7. Encapsulation of solid radioactive material.

The use of the IOSB for sorting and compacting dry waste and the encapsulation of solid radioactive materials produces the potential for airborne release. The IOSB ventilation monitoring system requires an addition to Technical Specifications to ensure adequate monitoring of building ventilation exhaust.

EVALUATION AND BASIS FOR SAFETY ANALYSIS:

Systems, Subsystems, Components Affected

This Technical Specification addition affects the IOSB ventilation monitoring system.

Safety Functions of Affected Systems/Components

The IOSB has a building ventilation system which provides protection against radioactive airborne releases. The IOSB ventilation system operates as follows: Filtered outside air is supplied by two supply fans (AH-2-36-1 and 2) rated at approximately 4400 and 2050 cfm, respectively. Total exhaust flow is performed by one exhaust fan (AH-2-36-3) rated at 8050 cfm, thus maintaining approximately 0.1" wg negative pressure in the IOSB.

This exhaust flow is monitored continuously with an isokinetic probe. In the event of an alarm, exhaust duct HV-56004 closes, exhaust fan AH-2-36-3 stops, supply fans AH-2-36-1 and 2 stop, and an alarm sounds (locally, in the facility control room, and in the main control room). These automatic actions minimize the chance of an airborne release.

Effects on Safety Functions/Analysis of Effects on Safety Functions

The IOSB ventilation system provides protection against radioactive airborne releases. Operation of the system produces a negative pressure in the building. During operation, the ventilation exhaust flow is continuously monitored. Upon an alarm, the exhaust duct closes and the supply and exhaust fans stop, minimizing any chance of an airborne release.

The monitor's setpoints are set statistically high enough above background to prevent spurious alarms, yet stop potential radioactive releases when detected. No planned airborne radioactive releases are anticipated from this pathway.

Technical Specification Table 3.16-1 specifies "With the monitoring device inoperable, ventilation flow shall be halted or continuous particulate samples taken..." This Action ensures that no unmonitored releases occur through this potential release pathway. Table 4.20-1 dictates a weekly surveillance consisting of an Instrument Channel Check. This is consistent with the requirements for other particulate samplers listed in the Table.

Summary

Proposed Amendment No. 165 adds a radiation monitor in the Interim Onsite Storage Building (IOSB) ventilation system to Technical Specification Table 3.16-1, Radioactive Gases Effluent Monitoring Instrumentation, and associated Table 4.20-1, Radioactive Gaseous Effluent Monitoring Instrumentation Surveillance Requirements.

The use of the IOSB for sorting and compacting dry waste and the encapsulation of solid radioactive materials produces the potential for airborne release. The IOSB ventilation monitoring system requires an addition to Technical Specifications to ensure adequate monitoring of building ventilation exhaust.

This Technical Specification addition affects the IOSB ventilation monitoring system.

Proposed Amendment No. 165 will not involve a significant increase in the probability or consequences of an accident previously evaluated because it adds a particulate monitor to Technical Specifications to ensure that no unmonitored releases occur from the Interim Onsite Storage Building. The associated Action statement is consistent with other Particulate Sampler Action statements in Table 3.16-1.

The Proposed Amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated because the Action statement to be added to Table 3.16-1 is consistent with other Action statements in the Table.

It does not involve a significant reduction in a margin of safety because this Proposed Amendment ensures that no unmonitored releases occur from this potential release pathway.

Therefore, Rancho Seco has determined that no significant hazards are involved in the operation of the facility in accordance with Proposed Amendment No. 165.