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April 3, 1985
NRC/TMI 85-019

Docket No. 50-320

GPU Nuclear Corporation
ATTN: Mr. F. R. Standerfer
Vice President/Director, TMI-2
P. O. Box 480
Hiddletown, PA 17057

Dear Sir:

Subject: Recovery Operations Plan Change No. 26

Reference: Letter from F. R. Standerfer, 4410-84-L-0200 to W. D. Travers dated December 24, 1984 (ROP Change Request 25)

The referenced letter proposed changes to the Recovery Operations Plan to support operation of the Containment Air Control Envelope (CACE). The proposed change recognizes the CACE vent monitors and establishes surveillance requirements for them.

Additions that have been concurred with by the licensee have been included in the footnotes on Table 4.3.3. One clarifies conditions under which the monitors must be operable. The other limits periods of inoperability of CACE monitors to seven (7) days versus the 30 days originally proposed by the licensee. Based on our enclosed safety evaluation we have concluded that the proposed change is justified and will not present an undue risk to the health and safety of the public. We therefore approve the proposed changes and are enclosing the amended pages for Recovery Operations Plan Change No. 26.

Sincerely,

ORIGINAL SIGNED BY
William D. Travers

William D. Travers
Deputy Program Director
TMI Program Office

Enclosure: As stated

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ATTACHMENT
SAFETY EVALUATION

Introduction

The Containment Air Control Envelope (CACE) is a structure adjoining the reactor building (RB) at the equipment hatch. The CACE is to be used as a staging and storage area for materials and equipment being transferred into and out of the Reactor Building. The design and use of the CACE was reviewed by the NRC and approved on December 4, 1984.

Discussion

The proposed change adds a requirement for monitoring the ventilation exhaust of the CACE and for performing periodic surveillance of the monitor, an airborne particulate detector. The monitor will provide confirmation that releases from the CACE are a small fraction of 10 CFR §50 Appendix I and plant technical specification limits during normal operation. The monitor will also be able to detect a degradation of filtration efficiency. The sensitivity of the monitor is 2.66×10^{10} counts per minute per minute per microcurie per cubic centimeter. The surveillance requirements provide assurance that the monitor will be operable and accurate. The detailed procedures used for calibration, setpoint adjustment and the use of this CACE are subject to NRC review and approval prior to implementation in accordance with Section 6.8.2 of the Proposed Technical Specifications.

Conclusion

The proposed change assures that any exhausts from the operation of the CACE ventilation system will be monitored. It does not reduce any safety margins or result in increased effluents to the environment. This proposed change falls within the scope of activities previously considered in the Programmatic Environmental Impact Statement (PEIS).

TABLE 4.3-3 (Cont.)

RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

NOTES:

- 1) During operation of the monitored system.
- 2) If monitor becomes inoperable, repair or replace by equivalent equipment within 12 hours. If not completed within 12 hours terminate operation of the monitored system and restore the inoperable monitor(s) to operable status.
- 3) Restore the inoperable monitor(s) to operable status within 72 hours.
- 4) If ion exchange effluent monitor is inoperable, sample on 4 hour frequency for gross beta. If inoperable longer than 24 hours then terminate operation of ion exchange system and restore the inoperable monitor to operable status.
- 5) With radioactive waste in the fuel handling building.
- 6) With the required instrumentation inoperable, suspend all operations involving movement of radioactive wastes in the fuel handling building, restore the inoperable equipment to OPERABLE status within 48 hours.
- 7) With the AMS-3 Inoperable, close at least one of the Reactor Building Equipment Doors and restore the inoperable equipment to operable status prior to reopening of both Equipment Doors.
- 8) Deleted
- 9) Two filter trains and associated monitors are normally available. If one monitor becomes inoperable, discontinue operation through the effected filter train and transfer operations to the operable filter train. If both monitors become inoperable, repair or replace by equivalent equipment within twelve (12) hours or conduct air sampling using alternate methods on a four (4) hour frequency. If repair or replacement is not completed within seven (7) days, terminate operation of the system until at least one monitor is returned to operable status.
- 10) With both reactor building equipment hatch airlock doors open simultaneously.

TABLE 4.3-3
 RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MINIMUM CHANNELS OPERABLE	APPLICABILITY	ACTION
1. CONTAINMENT						
a. Reactor Building Purge Sampler (AMS-3)	D	SA	H	1	Note 1	Note 3
b. Reactor Building Equipment Doors (AMS-3)	D	SA	H	1	Note 10	Note 7
c. Deleted						
d. CAGE Vent. Monitor	D	SA	M	1	Note 1	Note 9
2. FUEL HANDLING BUILDING EXHAUST MONITORS (HPR-221A or HPR-221B)						
a. Gaseous Activity	S	R	H	1	Note 5	Note 6
b. Particulate Activity	S	R	H	1	Note 5	Note 6
3. SDS MONITORS						
a. Process Monitor (IX04)	S	R	H	1	Note 1	Note 4
b. Area Monitor (IX03)	S	SA	H	1	Note 1	Note 2
4. MOHR MONITORS						
a. Area Monitors	S	R	H	3	Note 1	Note 3
b. Ping Monitors	S	R	H	1	Note 1	Note 3

(See following page for notes)

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