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July 21, 1987
NRC/TMI-87-056

Docket No. 50-320

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

Dear Mr. Standerfer:

Subject: Recovery Operations Plan Change Request No. 41

By letter dated May 20, 1987 you submitted Recovery Operations Plan Change Request (ROPCR) No. 41. The ROPCR proposed modifying Sections 4.9.12.1.e and 4.9.12.2.e of the Recovery Operations Plan (ROP) to allow use of local differential pressure indicators as well as those in the control room for verifying operability of the Auxiliary Building Air Cleanup Exhaust System and the Fuel Handling Building Air Cleanup Exhaust System. The current ROP only allows use of the control room instruments to verify system operability.

We have completed our review of your submittal and have determined that the alternate instrumentation described in your evaluation is acceptable for verifying the Fuel Handling Building and Auxiliary Building Air Cleanup Exhaust Systems' operability. Allowing use of the alternate instrumentation does not relax currently imposed surveillance requirements since the alternate instruments perform the same function as the control room instruments and will be monitored on the same required minimum time interval. The use of alternate instrumentation does not increase the probability or consequences of previously analyzed accidents, does not create the potential for additional accidents not previously analyzed, nor does it reduce margins of safety.

We therefore approve your request for modification of ROP sections 4.9.12.1.e and 4.9.12.2.e. The revised Recovery Operations Plan pages are enclosed. Our approval of your ROPCR No. 41 is designated as change approval No. 30. These changes are effective as of the date of this letter.

Sincerely,

ORIGINAL SIGNED BY:
William D. Travers

William D. Travers
Director
TMI Cleanup Project Directorate

Enclosures: As stated

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Mr. F. R. Standerfer

-2-

July 21, 1987
NRC/TMI-87-056

cc: T. F. Demmitt
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J. J. Byrne
A. W. Miller
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Enclosure

DOCKET NO. 50-320

Replace the following pages of the TMI-2 Recovery Operations Plan with the enclosed pages:

4.9-2

4.9-4

SURVEILLANCE REQUIREMENTS

4. **Fuel Handling Building Pressure:** Demonstrate that the system is capable of achieving a negative pressure within the building equal to or greater (more negative) than 1/8 inch water gauge with respect to atmospheric. It may be necessary to close doors and other building openings to achieve the required value. A test instrument, such as an inclined manometer or equivalent, shall be used in the performance of this test.
- C. After structural maintenance of the HEPA filter or charcoal adsorber housings, or following fire or chemical release in any ventilation zone communicating with the system by verifying that the ventilation system meets the following conditions:
 1. **Flow Test:** Reverify exhaust flow rate for the affected filter train(s) per Section 4.9.12.1.b.2.
 2. **Filter Pressure Drop:** Reverify the filter pressure drop surveillance prescribed in Section 4.9.12.1.a.2 for the affected filter train(s).
 3. **DOP Test:** Each affected filter train shall be retested in accordance with Section 4.9.12.1.b.3.
- D. After each complete or partial replacement of a HEPA filter bank by verifying that the ventilation system meets the following conditions:
 1. **DOP Test:** Each affected filter train shall be retested in accordance with Section 4.9.12.1.b.3.
- E. At least once per 24 hours by checking a d/p alarm or d/p indication.

NOTE: Supply fans may be operated as desired except that the number of operating supply fans shall not exceed the number of operating exhaust fans.

4.9.12.2 The Auxiliary Building Air Cleanup Exhaust System shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that the air cleanup exhaust system in the normal operating mode meets the following conditions:
 1. Deleted.
 2. **Filter Pressure Drop:** The d/p across the combined HEPA filters and charcoal adsorbers shall not exceed 6 inches water gauge.

SURVEILLANCE REQUIREMENTS

3. DOP Test: Each affected filter train shall be retested in accordance with Section 4.9.12.2.b.3.
- d. After each complete or partial replacement of a HEPA filter bank by verifying that the ventilation system meets the following conditions.
 1. DOP Test: Each affected filter train shall be retested in accordance with Section 4.9.12.2.b.3.
- e. At least once per 24 hours by checking a d/p alarm or d/p indication.

NOTE: Supply fans may be operated as desired except that the number of operating supply fans shall not exceed the number of operating exhaust fans.

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