

June 19, 1986

Docket Nos. 50-272
and 50-311

Mr. C. A. McNeill, Jr.
Vice President - Nuclear
Public Service Electric and Gas Company
Post Office Box 236
Hancocks Bridge, New Jersey 08038

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D. Fischer ACRS 10
T. Barnhart 8 OPA
LFMB

Dear Mr. McNeill:

SUBJECT: EXEMPTION FROM REQUIREMENT OF 10 CFR 50, APPENDIX J, III.D.2(b)(ii)

The Commission has issued an Exemption for Salem Nuclear Generating Station, Units 1 and 2, regarding a requirement in Appendix J, III.D.2(b)(ii) of 10 CFR Part 50 in response to your letter dated April 11, 1986. The Exemption will relieve the requirements of conducting a full pressure airlock leakage test whenever airlocks are opened during periods when containment integrity is not required.

The special circumstances that justified consideration of the Exemption conformed to paragraphs 50.12(a)(2)(ii) and 50.12(a)(2)(iii) of 10 CFR 50.12a.

The basis for this action are included in the enclosed Exemption.

Sincerely,

Donald C. Fischer, Senior Project Manager
PWR Project Directorate No. 3
Division of PWR Licensing-A, NRR

Enclosure:
As stated

cc w/enclosure:
See next page

OFC : PAD#3	: PAD#3	: OELD	: D/PAD#3	:	:	:
NAME : CVogan	: DF/Fischer/ps	: [Signature]	: [Signature]	:	:	:
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June 15, 1986

Docket Nos. 50-272
and 50-311

Mr. C. A. McNeill, Jr.
Vice President - Nuclear
Public Service Electric and Gas Company
Post Office Box 236
Hancocks Bridge, New Jersey 08038

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Donald C. Fischer, Senior Project Manager
PWR Project Directorate No. 3
Division of PWR Licensing-A, NRR

Enclosure:
As stated

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*SEE PREVIOUS PAGE FOR CONCURRENCE

OFC	:PAD#3*	:PAD#3	:OELD*	:D/PAD#3*	:	:
NAME	:CVogan	:DFischer/ps	:	:SVarga	:	:
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Mr. C. A. McNeill
Public Service Electric & Gas Company Salem Nuclear Generating Station

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UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of

PUBLIC SERVICE ELECTRIC AND
GAS COMPANY(Salem Nuclear Generating
Station, Units 1 and 2))
)
)
)
)
)
)Docket Nos. 50-272
50-311

EXEMPTION

I.

Public Service Electric and Gas Company (the licensee) holds Facility Operating License Nos. DPR-70 and DPR-75, which authorizes operation of the Salem Nuclear Generating Station, Units No. 1 and No. 2 (the facilities or Salem 1 and 2) at power levels not in excess of 3411 megawatts thermal. The licenses provide, among other things, that the facilities are subject to all rules, regulations, and Orders of the Nuclear Regulatory Commission (the Commission) now or hereafter in effect.

The facilities are pressurized water reactors located on the licensee's site in Salem County, New Jersey.

II.

Paragraph III.D.2(b)(ii) of Appendix J of 10 CFR Part 50 requires, in part, that a full pressure airlock leakage test be performed whenever airlocks are opened.

III.

By letter dated April 11, 1986 the licensee requested an Exemption from the requirement of 10 CFR 50, Appendix J, III.D.2(b)(ii) identified ~~in~~ II above and substitution of an airlock seal leakage test (Paragraph III.D.2(b)(iii) of Appendix J, 10 CFR Part 50) for the full pressure airlock test otherwise required by Paragraph III.D.2(b)(ii) when the airlock is opened while the reactor is in cold shutdown (Mode 5) or refueling (Mode 6), if no maintenance has been performed on the airlock. If an airlock is opened during Modes 5 and 6, Paragraph III.D.2(b)(ii) of Appendix J requires that an overall airlock leakage test at not less than the calculated peak containment pressure from a design-basis LOCA (Pa) be conducted before plant heatup and startup (i.e., entering Mode 4). The existing airlock doors are so designed that a full-pressure (i.e., Pa = 14.7 psig) test of an entire airlock can only be performed after strongbacks (structural bracing) have been installed on the inner door. Strongbacks are needed because the pressure exerted on the inner door during the test is in a direction opposite to that of the accident pressure direction. Installing strongbacks, performing the test, and removing strongbacks requires at least 8 hours per airlock (there are two airlocks) during which access through the airlock is prohibited.

If the periodic 6-month test of Paragraph III.D.2.(b)(i) of Appendix J and the test required by Paragraph III.D.2(b)(iii) of Appendix J are current, no maintenance has been performed on the airlock, and the airlock is properly sealed, there should be no reason to expect the airlock to leak excessively just because it has been opened in Mode 5 or Mode 6.

By letter dated April 11, 1986, Public Service Electric and Gas Company submitted information to identify the special circumstances for granting this exemption to Salem Units 1 and 2 pursuant to the Final Rule 50.12 (50 FR 50764) published on December 12, 1985. The purpose of Appendix J to 10 CFR ~~50~~ is to assure that containment leak-tight integrity can be verified periodically throughout service lifetime so as to maintain containment leakage within the limits specified in the facility Technical Specifications. The proposed alternative test method is sufficient to achieve this underlying purpose in that it provides adequate assurance of continued leak-tight integrity of the airlock. In addition, at the time this section of Appendix J was revised in 1980, the staff did not contemplate the undue hardship and cost which would result from the requirement to perform a time-consuming (approximately 8 hours) full-pressure test before starting up from even the shortest cold shutdown during which the airlock had been used for containment entry. Because of this, the staff has already granted this same exemption to numerous plants, and intends to revise Appendix J to alleviate the need for further similar exemptions.

Based on the above discussion, the licensee's proposed substitution of an airlock seal leakage test described in III.D.2(b)(iii) is acceptable.

IV.

Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12, these exemptions are authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security. The Commission further determines that special circumstances described by 10 CFR 50.12(a)(2)(ii) and (iii) exist in that application of the

regulation in the particular circumstances is not necessary to achieve the underlying purpose of the rule in that Public Service has proposed an acceptable alternative test method that accomplishes the intent of the regulation. Compliance would result in undue hardship that is significantly in excess of those contemplated when the regulation was adopted and that is significantly in excess of those incurred by others similarly situated in that plant startup is delayed and unnecessary personnel radiation exposures are incurred while performing an overall airlock leakage test at full pressure.

Accordingly, the Commission hereby grants the exemptions as described in Section III above from 10 CFR 50, Appendix J, III.D.2(b)(ii).

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of these Exemptions will have no significant impact on the environment (51 FR 20386, June 4, 1986).

These Exemptions are effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by:
Thomas M. Novak

Thomas M. Novak, Acting Director
Division of PWR Licensing-A
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland,
this 16th day of June 1986.

*SEE PREVIOUS PAGE FOR CONCURRENCES

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Pursuant to 10 CFR 51.32, the Commission has determined that the granting of these Exemptions will have no significant impact on the environment (51 FR 20386, June 4, 1986).

These Exemptions are effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Steven A. Varga, Director
PWR Project Directorate No. 3
Division of PWR Licensing-A

Dated at Bethesda, Maryland
this 16th day of June 1986.

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