- b. If the airlock is opened during a period when Primary Containment is not required, it need not be tested while Primary Containment is not required, but must be tested at P<sub>a</sub> prior to returning the reactor to an operating mode requiring PRIMARY CONTAINMENT INTEGRITY.
- D. Primary Containment Leakage Rates shall be limited to:
  - The maximum allowable Primary Containment leakage rate is 1.0 L<sub>a</sub>. The maximum allowable Primary Containment leakage rate to allow for plant startup following a type A test is 0.75 L<sub>a</sub>. The leakage rate acceptance criteria for the Primary Containment Leakage Rate Testing Program for Type B and Type C tests is ≤0.60 L<sub>a</sub> at P<sub>a</sub>, except as stated in Specification 4.5.D.2.
  - 2. Verify leakage rate through each MSIV is  $\leq$  11.9 scfh when tested at  $\geq$  20 psig.
- 3. The leakage rate acceptance criteria for the drywell airlock shall be  $\leq 0.05 L_a$  when measured or adjusted to  $P_a$ .
- E. Continuous Leak Rate Monitor
  - 1. When the primary containment is inerted, the containment shall be continuously monitored for gross leakage by review of the inerting system makeup requirements.
  - 2. This monitoring system may be taken out of service for the purpose of maintenance or testing but shall be returned to service as soon as practical.
- F. Functional Test of Valves
  - 1. All automatic primary containment isolation valves shall be tested for automatic closure by an isolation signal during each REFUELING OUTAGE and the isolation time determined to be within its limit. The following valves are required to close in the time specified below:

Main steam line isolation values:  $\geq$  3 seconds and  $\leq$  10 seconds

2. Each automatic primary containment isolation valve shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on

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A Primary Containment Leakage Rate Testing Program has been established to implement the requirements of 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. Guidance for implementation of Option B is contained in NRC Regulatory Guide 1.163, "Performance Based Containment Leak Test Program", Revision 0, dated September 1995. Additional guidance for NRC Regulatory Guide 1.163 is contained in Nuclear Energy Institute (NEI) 94-01, "Industry Guideline for Implementing Performance Based Option of 10 CFR 50, Appendix J," Revision 0, dated July 26, 1995, and ANSI/ANS 56.8-1994, "Containment System Leakage Testing Requirements." The Primary Containment Leakage Rate Testing Program conforms with this guidance as modified by approved exemptions.

The maximum allowable leakage rate for the primary containment ( $L_a$ ) is 1.0 percent by weight of the containment air per 24 hours at the design basis LOCA maximum peak containment pressure ( $P_a$ ). As discussed below,  $P_a$  for the purpose of containment leak rate testing is 35 psig.

The penetration and air purge piping leakage test frequency, along with the containment leak rate tests, is adequate to allow detection of leakage trends. Whenever a double gasketed penetration (primary containment head equipment hatches and the absorption chamber access hatch) is broken and remade, the space between the gaskets is pressurized to determine that the seals are performing properly. The test pressure of 35 psig is consistent with the accident analyses and the maximum preoperational leak rate test pressure.

Monitoring the nitrogen makeup requirements of the inerting system provides a method of observing leak rate trends and would detect gross leaks in a very short time. This equipment must be periodically removed from service for test and maintenance, but this out-of-service time be kept to a practical minimum.

Automatic primary containment isolation valves are provided to maintain PRIMARY CONTAINMENT INTEGRITY following the design basis loss-of-coolant accident. Closure times for the automatic primary containment isolation valves are not critical because it is on the order of minutes before significant fission product release to the containment atmosphere for the design basis loss of coolant accident. These valves are highly reliable, see infrequent service and most of them are normally in the closed position. Therefore, a test during each REFUELING OUTAGE is sufficient.

Large lines connecting to the reactor coolant system, whose failure could result in uncovering the reactor core, are supplied with automatic isolation valves (except containment cooling). Closure times restrict coolant loss from the circumferential rupture of any of these lines outside primary containment to less than that for a main steam line break (the design basis accident for outside containment line breaks). The minimum time for main steam isolation valve (MSIV) closure of 3 seconds is based on the transient analysis that shows the pressure peak 76 psig below the lowest safety valve setting. The maximum time for MSIV closure of 10 seconds is based on the value assumed for the main steam line break dose calculations and restricts coolant loss to prevent uncovering the reactor core. Per ASME Boiler and Pressure Vessel Code, Section XI, the full closure test of the MSIVs during COLD SHUTDOWNs will ensure OPERABILITY and provide assurance that the valves maintain the required closing time. The provision for a minimum of 92 days between the tests ensures that full closure testing is not too frequent. The MSIVs are partially stroked quarterly as part of reactor protection system instrument surveillance testing.

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