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August 31, 2007

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Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Nuclear Energy Institute 94-01, Revision 2, *"Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J"* and Electric Power Research Institute Report No. 1009325, Revision 2, August 2007, *"Risk Impact Assessment of Extended Integrated Leak Rate Testing Intervals."*

Project Number: 689

Dear Ms. Mensah:

On December 19, 2005, Nuclear Energy Institute (NEI) submitted for NRC staff review the NEI Topical Report 94-01, Revision 1j, *"Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J"* and Electric Power Research Institute (EPRI) Report No. 1009325, Revision 1, December 2005, *"Risk Impact Assessment of Extended Integrated Leak Rate Testing Intervals."* By letter dated February 21, 2007, the NRC submitted a Request for Additional Information (RAI). The RAIs were discussed with you on January 9, 2007 and on May 1, 2007. The RAI responses were submitted on May 25, 2007 for NRC review and endorsement of NEI 94-01 and EPRI Report No. 1009325.

As a result of the RAIs both the NEI and EPRI documents were revised. Enclosed are both documents along with the original RAI responses. The RAI responses are the same as previously provided to you in our response dated May 25, 2007 with the exception that the responses are now formatted such that it is stated what specifically was changed in each document as a result of the RAI.

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We believe the enclosed reports and responses fully address the RAIs and look forward to completion of the safety evaluation report endorsing the subject documents. Please contact me or Julie Keys at (202) 739-8128; jyk@nei.org should you have any questions.

Sincerely,

John C. Butler

Enclosures:
1. NEI 94-01, Revision 2, "*Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J*"
2. EPRI Report No. 1009325, Revision 2, August 2007, "*Risk Impact Assessment of Extended Integrated Leak Rate Testing Intervals*"
3. Response to NRC RAI on Risk Impact Assessment of Extended ILRT Intervals, Responses Applicable to NEI 94-01
4. Response to NRC RAI on Risk Impact Assessment of Extended ILRT Intervals, Responses Applicable to EPRI Report No. 1009325, Revision 1

c: Mr. Ken Canavan, EPRI
Mr. John Gisclon, EPRI
NRC Document Control Desk

NEI 94–01
Revision 2

NUCLEAR ENERGY INSTITUTE

INDUSTRY GUIDELINE FOR IMPLEMENTING PERFORMANCE–BASED OPTION OF 10 CFR PART 50, APPENDIX J

August 2007

REVISION 2 TO INDUSTRY GUIDELINE FOR IMPLEMENTING PERFORMANCE–BASED OPTION OF 10 CFR PART 50, APPENDIX J

August 2007

ACKNOWLEDGMENTS

This guidance document, Industry Guideline for Implementing Performance–Based Option of 10 CFR 50, Appendix J, NEI 94–01 was developed by the Nuclear Energy Institute (NEI) Type A Integrated Leakage Rate Test Interval Extension Task Force. We appreciate the direct participation of the many licensees who contributed to the development of the guideline and the participation of the balance of the industry that reviewed and submitted comments to improve the document clarity and consistency. The dedicated and timely effort of the many Task Force participants, including their management's support of the effort, is greatly appreciated.

NEI also wishes to express its appreciation to the Electric Power Research Institute (EPRI) who devoted considerable time and resources to the development of this revised industry Appendix J guideline.

FOREWORD

The purpose of this guidance is to assist licensees in the implementation of Option B to 10 CFR 50, Appendix J, "Leakage Rate Testing of Containment of Light Water Cooled Nuclear Power Plants" and in extending Type A Integrated Leak Rate Test (ILRT) surveillance intervals beyond ten years.

In response to NRC data gathering inquiries, the industry collected, evaluated, and provided summary data that supported the NRC's independent data analysis of NUREG-1493. To support this 2007 revision, many licensees responded to an NEI request and provided pertinent leakage rate testing experience information covering the periods from 1995 to 2001 and 2001 to 2007.

EXECUTIVE SUMMARY

This document, NEI-94-01, describes an acceptable approach for implementing the optional performance-based requirements of Option B to 10 CFR 50, Appendix J; includes provisions for extending Type A ILRT intervals to up to fifteen years and incorporates the regulatory positions stated in Regulatory Guide 1.163 (September 1995). It delineates a performance-based approach for determining Type A, Type B, and Type C containment leakage rate surveillance testing frequencies. Justification of extending test intervals is based on the performance history and risk insights.

This guideline discusses the performance factors that licensees must consider in determining test intervals. It does not address how to perform the tests because these details can be found in existing documents (e.g., ANSI/ANS-56.8-2002).

The performance criterion for Type A tests is a performance leakage rate (as defined in this guideline) of less than $1.0L_a$. Extension of Type A test intervals are allowed based upon two consecutive successful Type A tests and other requirements stated in Section 9.2.3 of this guideline. These additional requirements include supplemental inspections and a confirmatory plant-specific risk impact assessment. Type A testing shall be performed at a frequency of at least once per 15 years. If the Type A performance leakage rate is not acceptable, the performance criterion is not met, and a determination should be performed to identify the cause of unacceptable performance and determine appropriate corrective actions. Once completed, acceptable performance should be reestablished by demonstrating an acceptable performance leakage rate during a subsequent Type A test before resuming operation and by performing another successful Type A test within 48 months following the unsuccessful Type A test. Following these successful Type A tests, the surveillance frequency may be returned to at least once per 15 years.

Extensions of Type B and Type C test intervals are allowed based upon completion of two consecutive periodic as-found tests where the results of each test are within a licensee's allowable administrative limits. Intervals may be increased from 30 months up to a maximum of 120 months for Type B tests (except for containment airlocks) and up to a maximum of 60 months for Type C tests. If the Type B and C test results are not acceptable, the test frequency should be set at the initial test intervals. Once the cause determination and corrective actions have been completed, acceptable performance may be reestablished and the testing frequency returned to the extended intervals as specified in this document.

Containment airlock(s) shall be tested at an internal pressure of not less than P_a prior to a preoperational Type A test. Subsequent periodic tests shall be performed at a frequency of at least once per 30 months. When containment integrity is required, airlock door seals should be tested within 7 days after each containment

access. For periods of multiple containment entries where the airlock doors are routinely used for access more frequently than once every 7 days (e.g., shift or daily inspection tours of the containment), door seals may be tested once per 30 days during this time period.

The performance factors that have been identified as important and should be considered in establishing testing intervals include past performance, service, design, safety impact, and cause determination as described in Section 11.3.1.

If a licensee considers extended test intervals of greater than 60 months for Type B tested components, the review should include the additional considerations of as-found tests, schedule and review as described in Section 11.3.2.

Finally, this document discusses the general requirements for recordkeeping for implementation of Option B to Appendix J.

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1.0 INTRODUCTION

1.1 Background

Containment leakage rate testing is performed in accordance with 10CFR50, Appendix J, "Leakage Rate Testing of Containment of Light Water Cooled Nuclear Power Plants." Appendix J specifies containment leakage testing requirements, including the types of tests required. In addition, for each type of test, Appendix J discusses leakage rate acceptance criteria, test methodology, frequency of testing, and reporting requirements. The specific testing requirements are discussed in a variety of sources, including Technical Specifications, Containment Leakage Rate Testing Program, Final Safety Analysis Reports (FSARs), National Standards (e.g., ANSI/ANS-56.8–2002, "Containment System Leakage Testing Requirements"), and licensee/NRC correspondence. These documents require that periodic testing be conducted to verify the leakage integrity of the containment and those containment systems and components that penetrate the containment.

The reactor containment leakage test program includes performance of an Integrated Leakage Rate Test (ILRT), also known as a Type A test; and performance of Local Leakage Rate Tests (LLRTs), also known as either Type B or Type C tests. The Type A test measures overall leakage rate of the primary reactor containment. Type B tests are intended to detect leakage paths and measure leakage for certain primary reactor containment penetrations. Type C tests are intended to measure containment isolation valve leakage rates.

In 1995, the NRC amended the regulations to provide an Option B to the 10CFR50, Appendix J. Option B is a performance–based approach to Appendix J leakage testing requirements. This option, in concert with NEI 94-01, allows licensees with good ILRT performance history to reduce the Type A Integrated Leakage Rate Test (ILRT) frequency from three tests in 10 years to at least one test in 15 years. The initial 1995 relaxation of ILRT frequency was based on the NRC risk assessment contained in "Performance-Based Containment Leak-Test Program (NUREG-1493) and EPRI Risk Impact Assessment of Revised Containment Leak Rate Testing Intervals (TR-104285) both of which found that there was a very low increase in risk associated with increasing ILRT surveillance intervals to ten years. Furthermore, the NRC assessment stated that there was an imperceptible increase in risk associated with increasing ILRT intervals up to twenty years. In 2001, many licensees began to submit requests for one-time ILRT interval extensions beyond ten years, and it was deemed appropriate to assess the risk involved in extending ILRT intervals beyond ten years. EPRI Product No. 1009325, Revision 2, "Risk Impact Assessment of Extended Integrated Leak Rate Testing Intervals" demonstrated that generally there is little risk associated with extension of ILRT intervals of up to fifteen years. However, plant-specific confirmatory risk impact assessments are required. Moreover, pragmatic considerations require an assessment of the overall integrity of the containment, including Type A integrated leak rate testing at fifteen-year intervals.

For Type B and Type C tests, 10CFR50, Appendix J, Option B, in concert NEI 94-01, allows licensees to reduce testing frequency on a plant–specific basis based on experience history of each component, and established controls to ensure continued performance during the extended testing interval.

Generally, a FSAR describes plant testing requirements, including containment testing. In some cases, FSAR testing requirements differ from those of Appendix J. In many cases, Technical Specifications were approved that incorporated exemptions to provisions of Appendix J. Additionally, some licensees have requested and received exemptions after their Technical Specifications were issued. The alternate performance–based testing requirements contained in Option B of Appendix J will not invalidate such exemptions. However, any exemptions to the provisions of 10CFR50, Appendix J to be maintained in force as part of the Containment Leakage Testing Program should be clearly identified as part of the plant's program documentation.

Plants that have elected to invoke 10CFR50, Appendix J, Option B in concert with NEI 94-01 (1995) and Regulatory Guide 1.163 (1995) and who do not wish to extend ILRT surveillance intervals beyond ten years, including ten years with a one-time extension of the interval up to fifteen years are not required to comply with this revision or subsequent revisions of NEI 94-01.

1.2 Discussion

This guideline describes an approach that may be used to meet the alternate testing requirements described in 10CFR50, Appendix J, Option B. The performance history of containment, penetrations, and containment isolation valves is used as the means to justify extending test intervals for containment Type A, Type B, and Type C tests. This guideline provides a method for determining the extended test intervals based on performance.

Under Option B, test intervals for Type A, Type B, and Type C testing may be determined by using a performance–based approach. Performance–based test intervals are based on consideration of operating history of the component and resulting risk from its failure. Performance–based for Appendix J refers to both the performance history necessary to extend test intervals as well as the criteria necessary to meet the requirements of Option B. The performance–based approach to leakage rate testing discussed in NUREG–1493, "Performance–Based Leak–Test Program," concludes that the impact on public health and safety due to extended intervals is negligible. EPRI Product No. 1009325, Revision 2, "Risk Impact Assessment of Extended Integrated Leak Rate Testing Intervals" concludes that reducing the frequency of Type A tests (ILRTs) from the baseline (3 per 10 years) to

1 per 15 years leads to a small increase in risk. The approach of the EPRI Risk Impact Assessment included compliance with appropriate current risk-informed guidance of Regulatory Guide 1.174, Revision 1 (2002), "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions in Plant-Specific Changes to the Licensing Basis."

Type A tests focus on verifying the leakage integrity of a passive containment structure. Type B and C testing focuses on assuring that containment penetrations are essentially leak tight. These tests collectively satisfy the requirements of 10CFR50, Appendix J, Option B summarized as follows: "These test requirements ensure that (a) leakage through these containments or systems and components penetrating these containments does not exceed allowable leakage rates specified in the Technical Specifications and (b) integrity of the containment structure is maintained during its service life."

2.0 PURPOSE AND SCOPE

This guideline describes an acceptable method for implementing the optional performance–based requirements of Appendix J. This method uses industry performance data, plant–specific performance data, and risk insights in determining the appropriate testing frequency. Licensees may elect to use other suitable methods or approaches to comply with Option B, but must obtain NRC approval prior to implementation.

The approach described in this guideline to implement Appendix J, Option B includes:

- Continued assurance of the leakage integrity of the containment without adversely affecting public health and safety;

- A framework to acknowledge good performance;

- Utilization of risk and performance–based methods, including an awareness of the plant-specific risk impact of extension of ILRT intervals of up to fifteen years;

- An awareness of and attention to supplemental means of assessing and maintaining containment integrity, particularly for ILRT interval extensions beyond ten years. Specifically, this includes the Maintenance Rule and ASME Boiler and Pressure Vessel Code, Section XI, Subsections IWE/IWL inspections and

- Licensee flexibility to implement cost–effective testing methods.

This guideline delineates the basis for a performance–based approach for determining Type A, Type B, and Type C containment leakage rate surveillance testing frequencies. It does not address how to perform the tests because these details can be found in existing documents (e.g., ANSI/ANS-56.8–2002) that are endorsed for use. However, some differences exist between ANSI/ANS-56.8-2002, and this document, NEI 94-01. Where differences exist, NEI 94-01, Revision 2 takes precedence.

3.0 RESPONSIBILITY

Each licensee should determine if the requirements of the initial 10CFR50, Appendix J (Option A) or the alternate requirements (Option B) are most appropriate for its facility. If a licensee elects to implement the Option B requirements, the guidance described in this document has been reviewed and endorsed by the NRC as an acceptable method of implementing the requirements.

In addition, if a licensee elects to adopt Option B, it may elect to adopt the requirements that apply to a specific category of tests (i.e., Type A, or Type B and Type C tests) only.

Plants that have elected to adopt 10CFR50, Appendix J, Option B in concert with NEI 94-01 (1995) and Regulatory Guide 1.163 (1995) and who do not wish to extend ILRT surveillance intervals beyond ten years, including ten years with a one-time extension of the interval up to fifteen years are not required to comply with this revision or subsequent revisions of NEI 94-01.

4.0 APPLICABILITY

This guideline is applicable to licensees holding an operating license issued in accordance with 10 CFR 50.21(b) and 50.22, and 10 CFR Part 52, Subpart C.

Industry operating experience and plant modifications that may affect Type A, Type B, and Type C testing program(s) should be reviewed to assure test and maintenance programs are appropriately adjusted to reflect these changes.

5.0 DEFINITIONS

Definitions of most commonly accepted terms used in this guideline may be found in ANSI/ANS-56.8–2002. The following additional term and its definition is used in this guideline:

- The **performance leakage rate** is calculated as the sum of the Type A upper confidence limit (UCL) and as–left minimum pathway leakage rate (MNPLR) leakage rate for all Type B and Type C pathways that were in service, isolated, or not lined up in their test position (i.e., drained and vented to containment atmosphere) prior to performing the Type A test. In addition, leakage pathways that were isolated during performance of the test because of excessive leakage must be factored into the performance determination. The performance criterion for Type A tests is a performance leak rate of less than 1.0La.

6.0 GENERAL REQUIREMENTS

10CFR50, Appendix J, Option B states: "Type A tests to measure the containment system overall integrated leakage rate must be conducted under conditions representing design basis loss-of-coolant accident containment peak pressure. A Type A test must be conducted (1) after the containment system has been completed and is ready for operation and (2) at a periodic interval based on the historical performance of the overall containment system as a barrier to fission product releases to reduce the risk from reactor accidents. A general visual inspection of the accessible interior and exterior surfaces of the containment system for structural deterioration which may affect the containment leak-tight integrity must be conducted prior to each test, and at a periodic interval between tests based on the performance of the containment system. The leakage rate must not exceed the allowable leakage rate (La) with margin, as specified in the Technical Specifications. The test results must be compared with previous results to examine the performance history of the overall containment system to limit leakage."

A review of leakage rate testing experience indicates that only a small percentage of Type A tests have exhibited excessive leakage. Furthermore, the observed leakage rates for the few Type A test failures were only marginally above current limits. These observations, together with the insensitivity of public risk to containment leakage rate at these low levels, suggest that for Type A tests, intervals may be established based on performance. The Type A test is the primary means to detect containment leakage that is not detectable by the Type B and Type C testing programs, and is also used to verify at periodic intervals the accident leakage (L_a) assumptions in the accident analysis.

An LLRT is a test performed on Type B and Type C components. An LLRT is not required for the following cases:

- Primary containment boundaries that do not constitute potential primary containment atmospheric pathways during and following a Design Basis

Accident (DBA);

- Boundaries sealed with a qualified seal system; or,

- Test connection vents and drains between primary containment isolation valves which are one inch or less in size, administratively secured closed and consist of a double barrier.

For Type B and Type C tests, intervals shall be established based on the performance history of each component. Performance criterion for each component is determined by designating an administrative leakage limit for each component in the Type B and Type C testing program in accordance with guidance provided in Sections 6.5 and 6.5.1 of ANSI/ANS-56.8-2002. The acceptance criteria for Type B and Type C tests is based upon demonstrating that the sum of leakage rates at DBA pressure for containment penetrations and valves that are testable, is less than the total allowable leakage rate specified in the plant Technical Specifications.

Primary containment barriers sealed with a qualified seal system shall be periodically tested to demonstrate their functionality in accordance with the plant Technical Specifications. Specific details of the testing methodology and requirements are contained in ANSI/ANS-56.8–2002 and should be adopted by licensees with applicable systems. Test frequency may be set using a performance basis in a manner similar to that described in this guideline for Type B and Type C test intervals. Leakage from containment isolation valves that are sealed with a qualified seal system may be excluded when determining the combined leakage rate provided that:

- Such valves have been demonstrated to have fluid leakage rates that do not exceed those specified in the technical specifications or associated bases, and

- The installed isolation valve seal-water system fluid inventory is sufficient to ensure the sealing function for at least 30 days at a pressure of 1.10 Pa.

7.0 UTILIZATION OF EXISTING PROGRAMS

Licensees should use existing industry programs, studies, initiatives and data bases, where possible.

8.0 TESTING METHODOLOGIES FOR TYPE A, B AND C TESTS

Type A, Type B and Type C tests should be performed using the technical methods and techniques specified in ANSI/ANS-56.8–2002, or other alternative testing methods that have been approved by the NRC.

All Appendix J pathways must be properly drained and vented during the performance of the ILRT in accordance with Section 3.2.5 of ANSI/ANS-56.8-2002.

It should be noted that the Type B or C tests performed on associated pathways must test all of its containment barriers. This includes bonnets, packing's, flanged joints, threaded connections, and compression fittings. If the Type B or C test pressurizes any of the pathway's containment barriers in the reverse direction, it must be shown that test results are not affected in a non-conservative manner by directionality. The as–found and the as–left leakage rate for all pathways that are not drained and vented must be determined by Type B and Type C testing within the previous 30 calendar months of the time that the Type A test is performed and must be added to the Type A leakage rate UCL to determine the overall L_a surveillance acceptance criteria in accordance with the definition in Section 5.0 of this document.

For purposes of determining an acceptable Type A test for operability considerations, the as-found overall integrated leakage rate shall be determined. The as-found overall integrated leakage rate shall be calculated by adding the following quantities to the Type A UCL:

(1) The positive differences between the as-found MNPLR and the as-left MNPLR for each pathway tested and adjusted prior to the ILRT (savings), and

(2) The as-found MNPLR of all leakage paths isolated during the performance of the ILRT.

Note: Because of the performance–based emphasis on Type A testing, present criteria for Type A tests have been defined differently than in the previous ANSI/ANS-56.8-1994. The present criteria, the performance leakage rate (defined in Section 5), is not the same as the aforementioned as-found integrated leakage rate, and does not use the leakage savings value.

If a pathway is isolated during performance of an ILRT due to excessive leakage, and the pathway leakage can be determined by a local leakage rate test, the as–left MNPLR for that leakage path must also be added to the Type A UCL. If the pathway leakage cannot be determined by local leakage rate testing, the performance criteria for the Type A test were not met. If an excessively leaking containment penetration barrier pathway is discovered during the Type A test, and the pathway is neither a Type B or a Type C tested pathway, it shall still be tested to Type B or Type C test requirements after the Type A test and its as-left MNPLR added to the Type a test UCL. In this case the Type A test performance criterion is not met unless that pathway is subsequently added to the Type B or Type C test program. If the excessive leakage is from a source that can be tested only during a Type A test, the Type A test performance criterion is not met.

ANSI/ANS-56.8–2002, Section 6.4.4 also specifies surveillance acceptance criteria for Type B and Type C tests and states that the combined (as-found) leakage rate of all Type B and Type C tests shall be less than 0.6La when evaluated on a MNPLR basis at all times when containment operability is required. Moreover, the combined leakage rate for all penetrations subject to Type B and Type C tests shall be less than or equal to 0.6La as determined on an MXPLR basis from the as-left LLRT results. These combined leakage rate determinations shall be done with the latest leakage rate test data available, and shall be kept as a running summation of the leakage rates.

9.0 DETERMINING PERFORMANCE–BASED TEST INTERVAL FOR TYPE A TESTS

9.1 Introduction

Determination of the surveillance frequency of Type A tests is based upon satisfactory performance of leakage tests that meet the requirements of Appendix J. Performance in this context refers to both the performance history necessary to determine test intervals as well as overall criteria needed to demonstrate leakage integrity performance. Performance is also used as a basis for demonstrating negligible impact on public health and safety.

The purpose of Type A testing is to verify the leakage integrity of the containment structure. The primary performance objective of the Type A test is not to quantify an overall containment system leakage rate. The Type A testing methodology as described in ANSI/ANS-56.8–2002, and the modified testing frequencies recommended by this guideline, serves to ensure continued leakage integrity of the containment structure. Type B and Type C testing assures that individual penetrations are essentially leak tight. In addition, aggregate Type B and Type C leakage rates support the leakage tightness of primary containment by minimizing potential leakage paths. A review of performance history has concluded that almost all containment leakage is identified by local leakage rate testing.

This section discusses a method to determine a testing frequency for Type A testing based on performance. The extended test interval is based upon industry performance data that was compiled to support development of Option B to Appendix J, and is intended for use by any licensee. In adopting extended test intervals recommended in this guideline, a licensee should perform Type A testing in accordance with recommended industry practices.

Required surveillance intervals for recommended Type A testing given in this section may be extended by up to 9 months to accommodate unforeseen emergent conditions but should not be used for routine scheduling and planning purposes.

9.1.1 Performance Criteria

Performance criteria for establishing Type A test intervals should provide both the standard against which performance is to be measured and basis for determining that performance is acceptable.

The performance criterion for Type A test allowable leakage is a performance leakage rate of less than $1.0L_a$. This allowable performance leakage rate is calculated as the sum of the Type A UCL and as–left MNPLR leakage rate for all Type B and Type C pathways that were in service, isolated, or not lined up in their test position (i.e., drained and vented to containment atmosphere) prior to performing the Type A test. In addition, leakage pathways that were isolated during performance of the test because of excessive leakage must be factored into the performance determination. If the leakage can be determined by a local leakage rate test, the as– left MNPLR for that leakage path must also be added to the Type A UCL. If the pathway leakage cannot be determined by local leakage rate testing, the performance criteria are not met.

If an excessively leaking containment penetration barrier pathway is discovered during the Type A test, and the pathway is neither a Type B or a Type C tested pathway, it shall still be tested to Type B or Type C test requirements after the Type A test and its as-left MNPLR added to the Type a test UCL. In this case the Type A test performance criterion is not met unless that pathway is subsequently added to the Type B or Type C test program. If the excessive leakage is from a source that can be tested only during a Type A test, the Type A test performance criterion is not met.

Failure of Type B and Type C test components found during performance of a Type A test should be reviewed for cause determination and corrective actions. If the pathway leakage cannot be determined by local leakage rate testing, the Type A performance criteria are not met.

9.1.2 Test Interval

Extensions in test intervals are allowed based upon two consecutive, periodic successful Type A tests and requirements stated in Section 9.2.3 of this guideline. The elapsed time between the first and the last tests in a series of consecutive passing tests used to determine performance shall be at least 24 months.

9.2 <u>Type A Test</u>

9.2.1 Pretest Inspection and Test Methodology

Prior to initiating a Type A test, a visual examination shall be conducted of accessible interior and exterior surfaces of the containment system for structural problems that may affect either the containment structure leakage integrity or the performance of the Type A test. This inspection should be a general visual inspection of accessible interior and exterior surfaces of the primary containment and components. It is recommended that these inspections be performed in conjunction or coordinated with the ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWE/IWL required examinations.

ANSI/ANS-56.8-2002 testing methodology states that pathways open to the primary containment atmosphere under post–DBA conditions shall be drained and vented to the primary containment atmosphere during a Type A test. There are four exceptions discussed in ANSI/ANS-56.8-2002 that allow penetrations to be tested under the LLRT program and the results added to the Type A leakage rate Upper Confidence Limit (UCL). One exception states that pathways in systems that are required for proper conduct of the Type A test or to maintain the plant in a safe condition during the Type A test may be operable in their normal mode. Proper outage planning should identify systems that are important to shutdown safety. A sufficient number of systems should be available so as to minimize the risk during the performance of the Type A test.

For planning and scheduling purposes, or ALARA considerations, licensees may want to consider not venting and draining additional penetrations that are capable of local leakage rate testing.

9.2.2 Initial Test Intervals

A preoperational Type A test shall be conducted prior to initial reactor operation. If initial reactor operation is delayed longer than 36 months after completion of the preoperational Type A test, a second preoperational Type A test shall be performed prior to initial reactor operations.

The first periodic Type A test shall be performed after commencing reactor operation and within 48 months after the successful completion of the last preoperational Type A test. Periodic Type A tests shall be performed at a frequency of at least once per 48 months, until acceptable performance is established in accordance with Section 9.2.3. Each test interval begins upon completion of a Type A test and ends at the start of the next test.

If the test interval ends while primary containment integrity is either not required or it is required solely for shutdown activities, the test interval may be extended indefinitely. However, a successful Type A test shall be completed prior to entering the operating mode requiring primary containment integrity.

9.2.3 Extended Test Intervals

Type A testing shall be performed during a period of reactor shutdown at a frequency of at least once per 15 years based on acceptable performance history.

Acceptable performance history is defined as successful completion of two consecutive periodic Type A tests where the calculated performance leakage rate was less than 1.0 L_a. A preoperational Type A test may be used as one of the two Type A tests that must be successfully completed to extend the test interval, provided that an engineering analysis is performed to document why a preoperational Type A test can be treated as a periodic test. Elapsed time between the first and last tests in a series of consecutive satisfactory tests used to determine performance shall be at least 24 months.

For purposes of determining an extended test interval, the performance leakage rate is as defined in Section 5.0 and repeated here for completeness: The performance leakage rate is calculated as the sum of the Type A upper confidence limit (UCL) and as–left minimum pathway leakage rate (MNPLR) leakage rate for all Type B and Type C pathways that were in service, isolated, or not lined up in their test position (i.e., drained and vented to containment atmosphere) prior to performing the Type A test. In addition, leakage pathways that were isolated during performance of the test because of excessive leakage must be factored into the performance determination. If the pathway leakage can be determined by a local leakage rate test, the as–left MNPLR for that leakage path must also be added to the Type A UCL. If the pathway leakage cannot be determined by local leakage rate testing, the performance criteria for the Type A test are not met. If an excessively leaking containment penetration barrier pathway is discovered during the Type A test, and the pathway is neither a Type B or a Type C tested pathway, it shall still be tested to Type B or Type C test requirements after the Type A test and its as-left MNPLR added to the Type a test UCL. In this case the Type A test performance criterion is not met unless that pathway is subsequently added to the Type B or Type C test program. If the excessive leakage is from a source that can be tested only during a Type A test, the Type A test performance criterion is not met.

In reviewing past performance history, Type A test results may have been calculated and reported using computational techniques other than the Mass Point method from ANSI/ANS-56.8–2002 (e.g., Total Time or Point–to–Point). Reported test results from previously acceptable Type A tests can be used to establish the performance history. Additionally, a licensee may recalculate past Type A UCL (using the same test intervals as reported) in accordance with ANSI/ANS-56.8–2002 Mass Point methodology and its adjoining Termination criteria in order to determine acceptable performance history. In the event where previous Type A tests were performed at reduced pressure (as described in 10 CFR 50, Appendix J, Option A), at least one of the two consecutive periodic Type A tests shall be performed at peak accident pressure (P_a).

9.2.3.1 General Requirements for ILRT Interval Extensions beyond Ten Years

Type A ILRT intervals of up to fifteen years are allowed by this guideline. The Risk Impact Assessment of Extended Integrated Leak Rate Testing Intervals, EPRI report 1009325 indicates, in general, the risk impact associated with ILRT interval extensions for intervals up to fifteen years is small. However, plant-specific confirmatory analyses are required. In addition, although the historical containment leak-tight performance has been very good, a few instances of degradation have occurred and have been detected by supplemental means other than Type A ILRTs. These means include visual examinations, ASME Boiler and Pressure Vessel Code Section XI, Subsection IWE/IWL examinations and Maintenance Rule inspections. The following paragraphs summarize the additional requirements for extending ILRT intervals beyond ten years.

9.2.3.2 Supplemental Inspection Requirements

To provide continuing supplemental means of identifying potential containment degradation, a general visual examination of accessible interior and exterior surfaces of the containment for structural deterioration that may affect the containment leak-tight integrity must be conducted prior to each Type A test and during at least three other outages before the next Type A test if the interval for the Type A test has been extended to 15 years. It is recommended that these inspections be performed in conjunction or coordinated with the ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWE/IWL required examinations.

9.2.3.3 Deficiencies Identified During Supplemental Inspections

Deficiencies identified during supplemental inspections or at any time between Type A ILRTs should be included in the plant's corrective action program and a determination should be performed to identify the cause of the deficiency and determine appropriate corrective actions. The determination should include whether the deficiency is a local, one-time occurrence or if it could be more pervasive, and whether it is isolable in accordance with the discussion of Section 9.2.3 regarding penetration pathways. If the deficiency constitutes a non-isolable leakage pathway (for example, through-wall liner corrosion), the as-found leakage must be quantified and should be added to the as-left performance leak rate determined in the last ILRT. If the combination of leakage rates exceeds La, then the containment performance has degraded and the unit should be removed from an extended ILRT interval, as applicable, and corrective action pursued in accordance with Section 9.2.6.

9.2.3.4 Plant-Specific Confirmatory Analyses

To provide plant-specific assurance of the acceptability of the risk impact of extending ILRT intervals up to a maximum of fifteen years, a confirmatory risk impact assessment is required. The assessment should be performed using the approach and methodology described in EPRI Report 1009325, Revision 2, "Risk Impact Assessment of Extended Integrated Leak Rate Testing Intervals". The analysis is to be performed by the licensee and retained in the plant documentation and records as part of the basis for extending the ILRT interval.

9.2.4 Containment Repairs and Modifications

Repairs and modifications that affect the containment leakage integrity require local leakage rate testing or short duration structural tests as appropriate to provide assurance of containment integrity following the modification or repair. This testing shall be performed prior to returning the containment to operation.

9.2.5 Surveillance Acceptance Criteria

The as–found Type A test leakage rate must be less than the acceptance criterion of 1.0 L_a given in the plant Technical Specifications. Prior to entering a mode where containment integrity is required, the as–left Type A leakage rate shall not exceed 0.75 L_a. The as–found and as–left values are as determined by the appropriate testing methodology specifically described in ANSI/ANS-56.8–2002.

9.2.6 Corrective Action

If the Type A performance leakage rate is not acceptable, the performance criterion is not met, and a determination should be performed to identify the cause of unacceptable performance and determine appropriate corrective actions. Once completed, acceptable performance should be reestablished by demonstrating an acceptable performance leakage rate during a subsequent Type A test before resuming operation and by performing another successful Type A test within 48 months following the unsuccessful Type A test. Following these successful Type A tests, the surveillance frequency may be returned to at least once per 15 years.

10.0 <u>DETERMINING PERFORMANCE–BASED TEST FREQUENCIES FOR TYPE B AND TYPE C TESTS</u>

10.1 <u>Introduction</u>

This section discusses the method to determine extended test intervals for Type B and Type C tests based on performance. It presents a range of acceptable intervals based upon industry data that have been analyzed through a process similar to that used by NRC in NUREG–1493, and have been reviewed for safety significance. Individual licensees may adopt a testing interval and approach as discussed in this guideline provided that certain performance factors and programmatic controls are reviewed and applied as appropriate. Programmatic controls may be necessary to ensure that assumptions utilized in analysis of the industry data are reasonably preserved at individual facilities.

The range of recommended frequencies for Type B and Type C tests are discussed in Section 11.0. The proposed frequencies are in part based upon industry performance data that was compiled to support the development of Option B to Appendix J, and a review of their safety significance. A licensee should develop bases for new frequencies based upon satisfactory performance of leakage tests that meet the requirements of Appendix J. Additional considerations used to determine appropriate frequencies may include service life, environment, past performance, design, and safety impact. Additional technical information concerning the data may be found in NUREG–1493.

Consistent with standard scheduling practices for Technical Specifications Required Surveillances, intervals for the recommended surveillance frequency for Type B and Type C testing given in this section may be extended by up to 25 percent of the test interval, not to exceed 9 months.

10.2 Type B and Type C Testing Frequencies

The testing interval for each component begins after its Type B or Type C test is completed and ends at the beginning of the next test. If the testing interval ends while primary containment integrity is not required or is required solely for cold shutdown or refueling activities, testing may be deferred; however, the test must be completed prior to the plant entering a mode requiring primary containment integrity.

Leakage rates less than the administrative leakage rate limits are considered acceptable. Administrative limits for leakage rates shall be established, documented and maintained for each Type B and Type C component prior to the performance of local leakage rate testing in accordance with the guidance provided in ANSI/ANS-56.8-2002, Sections 6.5 and 6.5.1. The administrative limits assigned to each component should be specified such that they are an indicator of potential valve or penetration degradation. Administrative limits for airlocks may be equivalent to the surveillance acceptance criteria given for airlocks in Technical Specifications.

Administrative limits are specific to individual penetrations or valves, and are not the surveillance acceptance criteria for Type B and Type C tests. Due to the performance–based nature of Option B to Appendix J and this guideline, it is recommended that acceptance criteria for the combined leakage rate for all penetrations subject to Type B or Type C testing be defined in accordance with ANSI/ANS-56.8-2002, Section 6.4.4.

The surveillance acceptance criteria for airlocks are as specified in Technical Specifications, and administrative limits do not apply. In addition, there is other leakage rate testing specified in the Technical Specifications that contain Surveillance Acceptance Criteria and Surveillance Frequencies, for example, vent and purge valves and BWR main steam and feedwater isolation valves. This guideline does not address the performance–based frequency determination of those surveillances.

If no plant-specific technical specifications are in effect for BWR and PWR containment purge and vent valves and/or BWR main steam and feedwater isolation valves, the interval for Type C tests should be limited to 30 months.

10.2.1 Type B Test Intervals

10.2.1.1 Initial Test Intervals (Except Containment Airlocks)

Type B tests shall be performed prior to initial reactor operation. Subsequent periodic Type B tests shall be performed at a frequency of at least once per 30 months, until acceptable performance is established per Section 10.2.1.2.

10.2.1.2 Extended Test Intervals (Except Containment Airlocks)

The test intervals for Type B penetrations may be increased based upon completion of two consecutive periodic as–found Type B tests where results of each test are within a licensee's allowable administrative limits. Elapsed time between the first and last tests in a series of consecutive satisfactory tests used to determine performance shall be 24 months or the nominal test interval (e.g., refueling cycle) for the component prior to implementing Option B to Appendix J. An extended test interval for Type B tests may be increased to a specific value in a range of frequencies from greater than once per 30 months up to a maximum of once per 120 months. The specific test interval for Type B penetrations should be determined by a licensee in accordance with Section 11.0.

10.2.1.3 Repairs or Adjustments (Except Containment Airlocks)

In addition to the periodic as–found Type B test, an as–found Type B test shall be performed prior to any maintenance, repair, modification, or adjustment activity if the activity could affect the penetration's leak tightness. An as–left Type B test shall be performed following maintenance, repair, modification or adjustment activity. In addition, if a primary containment penetration is opened following as–found testing, a Type B test shall be performed prior to the time primary containment integrity is required. If the as–found and as–left Type B test results are both less than a component's allowable Administrative Limit, a change in test frequency is not required. If as–found or as–left test results are greater than the allowable administrative limit, provisions of Section 10.2.1.4 apply.

Frequency for a Type B testing shall be in accordance with Section 10.2.1.1 if the penetration is replaced or engineering judgment determines that modification of the penetration has invalidated the performance history. Testing shall continue at this frequency until adequate performance is established in accordance with Section 10.2.1.2.

10.2.1.4 Corrective Action

If Type B test results are not acceptable, then the testing frequency should be set at the initial test interval per Section 10.2.1.1. In addition, a cause determination should be performed and corrective actions identified that focus on those activities that can eliminate the identified cause of failure[1] with appropriate steps to eliminate recurrence. Cause determination and corrective action should reinforce achieving acceptable performance. Once the cause determination and corrective actions have been completed, acceptable performance may be reestablished and the testing frequency returned to the extended interval in accordance with Section 10.2.1.2.

Failures of Type B penetrations discovered during performance of a Type A test should be considered as failures of a Type B test for purposes of cause determination and corrective action. This includes failures of penetrations that were not previously identified by a Type B testing program.

10.2.2 Containment Airlocks

10.2.2.1 Test Interval

Containment airlock(s) shall be tested at an internal pressure of not less than P_a prior to a preoperational Type A test. Subsequent periodic tests shall be performed at a frequency of at least once per 30 months. Containment airlock tests should be performed in accordance with ANSI/ANS-56.8–2002. In addition, equalizing valves, door seals, and penetrations with resilient seals (i.e., shaft seals, electrical penetrations, view port seals and other similar penetrations) that are testable, shall be tested at a frequency of once per 30 months.

[1] A failure in this context is exceeding an administrative limit and not the total failure of the penetration. Administrative limits are established at a value low enough to identify and allow early correction of potential total penetration failures.

Airlock door seals should be tested prior to a preoperational Type A test. When containment integrity is required, airlock door seals should be tested within 7 days after each containment access.

For periods of multiple containment entries where the airlock doors are routinely used for access more frequently than once every 7 days (e.g., shift or daily inspection tours of the containment), door seals may be tested once per 30 days during this time period.

Door seals are not required to be tested when containment integrity is not required, however they must be tested prior to reestablishing containment integrity. Door seals shall be tested at P_a, or at a pressure stated in the plant Technical Specifications.

10.2.2.2 Repairs or Adjustments of Airlocks

Following maintenance on an airlock pressure-retaining boundary, one of the following tests shall be completed:

- Airlock shall be tested at a pressure of not less than P_a; or

- Leakage rate testing at P_a shall be performed on the affected area or component.

10.2.2.3 Corrective Action

If containment airlock Type B test results are not acceptable, then a cause determination should be performed and corrective actions identified that focus on those activities that can eliminate the identified cause of a failure[2] with appropriate steps to eliminate recurrence. Cause determination and corrective action should reinforce achieving acceptable performance.

10.2.3 Type C Test Interval

10.2.3.1 Initial Test Interval

Type C tests shall be performed prior to initial reactor operation. Subsequent periodic Type C tests shall be performed at a frequency of at least once per 30 months, until adequate performance has been established consistent with Section 10.2.3.2.

[2] A failure in this context is exceeding performance criteria for the airlock, not a total failure.

10.2.3.2 Extended Test Interval

Test intervals for Type C valves may be increased based upon completion of two consecutive periodic as–found Type C tests where the result of each test is within a licensee's allowable administrative limits. Elapsed time between the first and last tests in a series of consecutive passing tests used to determine performance shall be 24 months or the nominal test interval (e.g., refueling cycle) for the valve prior to implementing Option B to Appendix J. Intervals for Type C testing may be increased to a specific value in a range of frequencies from 30 months up to a maximum of 60 months. Test intervals for Type C valves should be determined by a licensee in accordance with Section 11.0.

10.2.3.3 Repairs or Adjustments

In addition to the periodic as–found Type C test, an as–found Type C test shall be performed prior to any maintenance, repair, modification, or adjustment activity if it could affect a valve's leak tightness. An as–left Type C test shall be performed following maintenance, repair, modification or adjustment activity unless an alternate testing method or analysis is used to provide reasonable assurance that such work does not affect a valve's leak tightness and a valve will still perform its intended function.

If as–found and as–left Type C test results are both less than a valves allowable administrative limit, a change of the test frequency is not required. If as–found or as–left test results are greater than the allowable administrative limit, then provisions of Section 10.2.3.4 apply.

The frequency for Type C testing shall be in accordance with Section 10.2.3.1 if a valve is replaced or engineering judgment determines that modification of a valve has invalidated the valve's performance history. Testing shall continue at this frequency until an adequate performance history is established in accordance with Section 10.2.3.2.

10.2.3.4 Corrective Action

If Type C test results are not acceptable, then the testing frequency should be set at the initial test interval per Section 10.2.3.1. In addition, a cause determination should be performed and corrective actions identified that focus on those activities that can eliminate the identified cause of a failure[3] with appropriate steps to eliminate recurrence. Cause determination and corrective action should reinforce achieving acceptable performance. Once the cause determination and corrective

[3] A failure in this context is exceeding an administrative limit and not the total failure of the valve. Administrative limits are established at a value low enough to identify and allow early correction of total valve failures.

actions have been completed, acceptable performance may be reestablished and the testing frequency returned to the extended interval in accordance with Section 10.2.3.2.

Failures of Type C valves that are discovered during performance of a Type A test should be considered as a failure of a Type C test for purposes of cause determination and corrective action. This includes failures of valves that were not previously identified by a Type C test.

11.0 BASES FOR PERFORMANCE AND RISK–BASED TESTING FREQUENCIES FOR TYPE A, TYPE B, AND TYPE C TESTS

11.1 Introduction

This section provides guidance on establishing leakage testing frequencies and provides information regarding the risk impact of extending leakage rate testing intervals. Extended test intervals in Sections 9.0 and 10.0 have been selected based on performance, and have been assessed for risk impact. The various factors and discussion in this section should be considered when establishing different plant–specific testing frequencies.

Section 9.0 provides guidance on extending Type A ILRT surveillance intervals.

Section 10.0 presents a range of acceptable extended test intervals for Type B and Type C tests. Individual licensees may adopt specific testing intervals of up to 60 months as discussed in Section 10.0 without additional detailed analysis provided the performance factors discussed in Section 11.3.1 are considered. Additional programmatic controls are discussed in Section 11.3.2 and should be considered when the extended test intervals are greater than 60 months.

11.2 Discussion

Assessments of the risk impact of extending leakage rate testing intervals have been performed at two different times to support similar objectives. The more recent risk impact assessment, completed in 2007, supported optimized ILRT interval extensions of up to fifteen years. The previous assessments completed in 1994-1995 supported Type A ILRT extensions of up to ten years, as well as extensions of Type B and Type C testing intervals.

The objective of the work concluded in 2007 and published as EPRI Product No. 1009325, Revision 2 "Risk Impact Assessment of Extended Integrated Leak Rate Testing Intervals" was to perform a general risk impact assessment for optimized ILRT intervals of up to fifteen years, utilizing current industry performance data and risk-informed guidance, primarily NRC Regulatory Guide 1.174, Revision 1. This risk impact assessment complements the previous EPRI report, TR-104285, *Risk Impact Assessment of Revised Containment Leak Rate Testing Intervals*. The earlier report considered changes to local leak rate testing intervals as well as changes to ILRT testing intervals. The original risk impact assessment considered the change in risk based on population dose, whereas the revision considered dose as well as large early release frequency (LERF) and containment conditional failure probability (CCFP). The following paragraphs discuss the approach taken and results of this assessment.

Approach

The first step was to obtain current containment leak rate testing and performance information. This was obtained through an NEI industry-wide survey conducted in 2001. Additional information regarding recent industry ILRT performance was obtained in 2007. A database was generated using this information supplemented with recent industry failure reports and previous survey information. The data indicate that there were no failures that could result in a risk-significant large early release. This information was used to develop the probability of a pre-existing leak in the containment.

This information was further supplemented with an expert elicitation to assist in the determination of the risk-significant large failure magnitude and frequency. While not utilized in the primary risk evaluation, the expert elicitation was employed as a supporting sensitivity analysis.

Having both the conservative assessment failure probability as well as the expert elicitation sensitivity analysis, the risk impact was determined for two example plants, a PWR and BWR, with accident classes developed similar to the original EPRI report but with enhancements for assessing changes in LERF.

Results

Using the conservative assumptions concerning the leakage and timing associated with a large early release, the reduction in frequency of the Type A ILRT test results in a change in LERF that ranges between the "very small" (< 1E-07) and "small" (1E-07 to 1E-06) risk increase regions of Regulatory Guide 1.174, Revision 1. In the cases where the risk increase is conservatively calculated to be greater than the "very small" region, the total LERF is significantly lower than the Regulatory Guide 1.174, Revision 1 threshold criteria of total LERF less than 1E-05 per year. The core damage frequency remains unchanged.

Other figures-of-merit have similar very small changes, including the population dose rate and the conditional containment failure probability (CCFP) changing very little over the range of ILRT interval extensions from 3 in 10 years to 1 in 15 years.

The sensitivity study employing less conservative expert elicited values for the frequency and magnitude of large early release probabilities, results in even smaller calculated increases to LERF as a result of changes in the ILRT interval extension.

As can be seen from the two examples as well as the many plant-specific analyses developed to date to support one-time ILRT interval extensions, these results, and therefore the conclusions derived from them, are generally applicable. However, as required in Sections 9.2.3.1 and 9.2.3.3 of this guideline, plant-specific confirmatory risk impact assessments are also required.

Defense-in-depth as well as safety margins are maintained through the continued inspection of containment as required by ASME Section XI, Subsections IWE and IWL, and other required inspections, such as those performed to satisfy the Maintenance Rule. In addition, this guideline requires acceptable historical performance of Type A Integrated Leak Rate Tests before integrated leak rate testing intervals can be extended.

This risk impact assessment confirms previous (NUREG-1493) conclusions regarding risk in extending ILRT intervals up to fifteen years, using current regulatory guidance and risk-informed concepts.

Similar approaches were taken in 1994-1995, although the guidance of Regulatory Guide 1.174 was not available at that time. The following paragraphs discuss these approaches.

The effect of extending containment leakage rate testing intervals is a corresponding increase in the time that an excessive leak path would exist undiscovered and uncorrected. The degree to which intervals can be extended is a direct function of the potential effects on the health and safety of the public that occur due to an increased likelihood of undiscovered containment leakage.

In order to determine the acceptability of extended testing intervals, the methodology described in NUREG–1493 was applied, with some modifications, to historical representative industry leakage rate testing data gathered from approximately 1987 to 1993, under the auspices of NEI. The range of testing intervals recommended for Type B and Type C testing was evaluated to determine the level of increased risk in the event of an accident. The same methodology was also applied to the 10–year interval for Type A testing. In all cases, the increased risk corresponding to the extended test interval was found to be small and compares well to the guidance of the NRC's safety goals.

NUREG–1493 provided the technical basis to support rulemaking to revise leakage rate testing requirements contained in Option B to Appendix J. The basis consisted of qualitative and quantitative assessments of the risk impact (in terms of increased public dose) associated with a range of extended leakage rate testing intervals.

NUREG–1493 found the effect of Type B and Type C testing on overall accident risk is small and concluded that:

- Performance–based alternatives to local leakage rate testing requirements are feasible without significant risk impacts; and

- Although extended testing intervals led to minor increases in potential off–site dose consequences, the actual decrease in on–site (worker) doses exceeded (by at least an order of magnitude) the potential off–site dose increases.

NEI, in conjunction with EPRI, undertook a similar study in order to supplement NRC's rulemaking basis and provide added assurance the more detailed elements in this guideline have an adequate basis. Results of the EPRI study are documented in EPRI Research Project Report TR–104285, "Risk Impact Assessment of Revised Containment Leak Rate Testing Intervals."

EPRI developed an abbreviated methodology that was used to assess plant risk impact associated with containment leakage rate testing alternatives currently being proposed by this guideline. The overall approach involved an examination of the risk spectra from accidents reported in PWR and BWR IPEs. Plant risk was quantified for PWR and BWR representative plants. Quantification of the risk considered the consequences from containment leakage in more detail than reported in IPEs. The impact associated with alternative Type B and Type C test intervals, measured as a change in risk contribution to baseline risk, is presented in Table 1. The risk values compare well with the analysis in NUREG–1493.

The risk model was specifically quantified by using a "failure to seal" probability (as opposed to failure to close considered in IPEs). This required failure rates to be developed for this failure mode. Type B and Type C test data obtained by NEI allowed determination of failure rates where failure is defined as the measured leakage exceeding allowable administrative limits for a specific Type B or Type C component. The failure rate values were used in the containment isolation system fault tree, and used to calculate a failure–to–seal probability. Characterization of baseline risk (in terms of accident sequences that are influenced by containment isolation valve or containment penetration leakage rate) allowed the plant models to calculate the risk impact associated with changes in test intervals.

As indicated above, historical industry failure rate data was used to develop the component failure to seal probabilities used in the analysis. This approach is quite conservative because these guidelines require demonstration of performance prior to extending the component leakage rate testing interval. The performance demonstration consists of successful completion of two consecutive leakage rate tests to increase the interval from 30 to 60 months and three consecutive leakage rate tests to increase the interval to greater than 60 months. This takes advantage of the findings of NUREG–1493, Appendix A, which suggests that "If the component does not fail within two operating cycles, further failures appear to be governed by the random failure rate of the component," and "Any test scheme considered should require a failed component pass at least two consecutive tests before allowing an extended test interval." In addition, the penetration failure analysis considered components that exceeded the administrative limits as failures. The containment leakage rate computation conservatively used maximum pathway leak rates derived from the upper bounds of the NEI data. Therefore, the analysis is very conservative, and the component performance trending provides the necessary confidence demonstration that component leakage is being managed at a low level.

For Type C test, a bounding analysis was performed that assumed all valves have test intervals that were extended to 48, 60, 72 and 120 months. For Type B tests, it was assumed that electrical penetrations were tested at a nominal 120 months frequency. In addition, it was assumed that some portion of the penetrations was tested periodically during the 120 months. Airlock tests were assumed to be conducted every 24 months. Blind flanges were assumed to be tested after each opening, or at 48–month intervals.

There are many points of similarity between the NUREG–1493 report and the EPRI study, both in methodology and assumptions, reflecting close agreement on elements important to safety for containment leakage rate testing. The similarity also extends to the results. The EPRI study confirms the low risk significance associated with Type A testing intervals of 10 years. Similarly, extending the Type B and Type C test intervals to 120 months was found acceptable provided the Type B or Type C components have successfully passed two consecutive tests, and provided that certain controls were imposed on the leakage rate testing program.

Changing Appendix J test intervals from those presently allowed to those in this guideline slightly increases the risk associated with Type A and Type B and Type C–specific accident sequences as discussed in Table 1. The data suggests that increasing the Type C test interval can slightly increase the associated risk, but this ignores the risk reduction benefits associated with increased test intervals. In addition, when considering the total integrated risk (representing all accident sequences analyzed in the IPE), the risk impact associated with increasing test intervals is negligible (less than 0.1 percent of total risk). This finding is further reinforced by the conservative assumptions used in the analysis. The EPRI study reaffirms the conclusion in NUREG–1493 that changes to leakage testing frequencies are "feasible without significant risk impact."

Table 1

Risk Results for Type A, Type B, and Type C Test Intervals

Test Type	*Risk–Impact Current Test Intervals*	*Risk–Impact Extended Test Intervals*	*Comment*
		PWR Representative Plant Summary	
Type A	The increase in ILRT test intervals from 3 in 10 years to 1 in15 years results in a small change in LERF that ranges between the "very small" (<1E-07) and "small" (1E-07 to 1E-06) ΔLERF risk increase regions of NRC Regulatory Guide 1.174. In cases where the risk increase is greater than the "very small" region, the total LERF is significantly lower than the Regulatory Guide 1.174 threshold criteria of total LERF < 1E-05 per year. Changes in population dose and CCFP are also very small.		Please refer to EPRI Report 1009325, Revision 2, PWR example discussion for more information.
Type B	«0.001% incremental risk contribution 6.9E–05 person–rem/yr rebaselined risk	<0.001% incremental risk contribution, 1.3E–04 person–rem/yr rebaselined risk. Based on testing with some components tested periodically during time interval months. In addition, blind flanges and penetrations would be removed and retested during every refueling outage. Airlocks to be tested every 24 months.	A range of 0.2 to 4.4 percent is provided for other plants for both Type B and Type C penetrations in NUREG–1493.
Type C	0.022% of total risk 4.9E–03 person–rem/yr	0.04% incremental risk contribution, 8.8E–03 person–rem/yr rebaselined risk, based on 48 month test intervals. 1E–2, 1.2E–2, and 1.64E–2 person–rem/yr risk, based on 60, 72, and 120 month test intervals	A range of 0.2 to 4.4 percent of total risk is provided for other plants for both Type B and Type C penetrations in NUREG–1493.

Table 1 (continued)

Test Type	*Risk–Impact Current Test Intervals*	*Risk–Impact Extended Test Intervals*	*Comment*
BWR Representative Plant Summary			
Type A	The increase in ILRT test interval from 3 in 10 years to 1 in15 years results in a change in LERF that falls in the "very small" (<1E-07) ΔLERF risk increase region of NRC Regulatory Guide 1.174. Moreover, the total LERF is significantly lower than the Regulatory Guide 1.174 threshold criteria of total LERF < 1E-05 per year. Changes in population dose and CCFP are also very small.		Please refer to EPRI Report 1009325, Revision 2, BWR example discussion for more information.
Type B	<0.001% of total risk 8.0E–06 person–rem/yr	0.001%, 1.85E–05 person–rem/yr Based on testing with some components tested periodically during time interval months. In addition, blind flanges and penetrations would be removed and retested during every refueling outage. Airlocks to be tested every 24 months.	A range of 0.2 to 4.4 percent is provided for other plants for both B and C penetration types in NUREG–1493.
Type C	0.002% of total risk 4.5E–06 person–rem/yr	0.006% of total risk, 1.1E–04 person–rem/yr, based on 48 months test intervals. 1.8E–4, 2.3E–4, and 5.01E–4 person–rem/yr risk, based on 60, 72, and 120 month test intervals.	A range of 0.2 to 4.4 percent is provided for other plants for both B and C penetration types in NUREG–1493.

11.3 Plant–Specific Testing Program Factors

A licensee may adopt specific surveillance frequencies from Section 10.0 provided that plant–specific test performance history is acceptable as discussed in Section 10.0, and certain performance factors and controls are reviewed and applied as appropriate in the determination of test intervals. Each licensee should demonstrate by quantitative or qualitative review that plant–specific performance is adequate to support the extended test interval.

11.3.1 Performance Factors

Prior to determining and implementing extended test intervals for Type B and Type C components, an assessment of the plant's containment penetration and valve performance should be performed and documented. The following are some factors that have been identified as important and should be considered in establishing testing intervals:

- *Past Component Performance* — Based on a survey sample of industry data from approximately 1987 to 1993, 97.5% of the industry's containment penetrations have not failed a Type B test, and 90% of the isolation valves have never failed a Type C test in over 500 reactor–years of commercial operation. Of the 10% of the Type C tests that have failed, only 22% of those have failed more than once. A licensee should ensure that leakage rate testing intervals are not extended until plant–specific component performance of two successful consecutive as–found tests are performed.

- *Service* — The environment and use of components are important in determining its likelihood of failure. For example, a plant may have experienced high leakage in valves in a high–flow steam environment due to effects of valve seat erosion. Certain valves that open and close frequently during normal plant operations may have experienced higher leakage. Moreover, penetrations and valves may have components that are sensitive to age-related degradation, including resilient seals subject to high-temperature conditions, certain electrical penetrations with epoxy seals, and mechanical bellows. The licensee's testing program should identify these types of components to establish their testing intervals based on their performance history.

- *Design* — Valve type and penetration design may contribute to leakage. For example, motor operated valves in a plant may be found to leak less frequently than check valves, and may support a longer test interval. Vendor recommendations for valve or penetration subcomponent service life may be a factor in determining test intervals. Certain passive penetrations, such as electrical penetrations, may have had excellent performance history. Test intervals for these penetrations may be relatively longer.

- *Safety Impact* — The relative importance of penetrations can be judged in terms of the potential impact of failure in limiting releases from containment under accident conditions. Due to size or system inter–connections, some components or penetrations may be more important than others in ensuring the safety function of a containment penetration is achieved. This relative importance should be considered in determining the test interval.

- *Cause Determination* — For failures identified during an extended test interval, a cause determination should be conducted and appropriate corrective actions identified. Part of a corrective action process should be to identify and address common–mode failure mechanisms.

11.3.2 Programmatic Controls

If a licensee considers extended test intervals of greater than 60 months for a Type B tested component, the review to establish surveillance test intervals should include the additional considerations:

- *As–found Tests* — In order to provide additional assurance that the increased probability of component leakage is kept to a minimum, and is reasonably within the envelope of industry data, a licensee should consider requiring three successive periodic as–found tests to determine adequate performance.

- *Schedule* — To minimize any adverse effects of unanticipated random failures, and to increase the likelihood unexpected common–mode failure mechanisms will be identified in a timely manner, a licensee should implement a testing program that ensures components are tested at approximate evenly– distributed intervals across the extended testing interval for valves or groups of valves. A licensee should schedule a portion of the tests during each regularly scheduled outage or on some regular periodic basis, such that some percentage of the components are tested periodically, and all components are tested at the new extended test interval of greater than 60 months.

- *Review* — A review of the entire process should be performed prior to establishing alternate test intervals under 10CFR50, Appendix J, Option B, including plant–specific performance history, data analysis, establishment of surveillance frequencies, and, if available and applicable, any risk–impact assessment. This review should include adjustments to the program as required, based on expert insight or engineering judgment. Results of the review should be documented.

12.0 RECORDKEEPING

12.1 Report Requirements

A post–outage report shall be prepared presenting results of the previous cycle's Type B and Type C tests, and Type A, Type B, and Type C tests, if performed during that outage. The technical contents of the report are generally described in ANSI/ANS-56.8–2002, and shall be available on–site for NRC review. The report shall also show that the applicable performance criteria are met, and serve as a record that continuing performance is acceptable.

12.2 Records

Documentation developed for implementation of 10CFR50, Appendix J, Option B should be done in accordance with licensee established procedures. Sufficient documentation shall be collected and retained so that the effectiveness of the implementation of 10CFR50, Appendix J, Option B can be reviewed and determined. This documentation, including the plant-specific confirmatory risk impact assessment for extending ILRT intervals beyond ten years shall be available for internal and external review, but is not required to be submitted to the NRC.