will not be shut post-accident. The refueling interval inspection specified for the piping of these systems will ensure the leak tightness of these systems at pressures comparable to those pressures which would exist post-accident. Technical Specifications 4.4.6.5, 4.4.6.6, 4.4.6.7 incorporate the exemptions to 10CFR50 Appendix J requirements as allowed by 10CFR50.12 and granted by the Commission for the Kewaunee Nuclear Power Plant.(5)

Acceptance Criteria for Type B & C Tests (TS 4.4.b.8)

Appendix J to 10CFR50 defines the acceptable leak rate through Type B and C penetrations.

There are penetrations which extend the containment atmosphere past the boundary of the Special Ventilation Zone of the auxiliary building. Containment atmosphere escaping through these paths will not be filtered through charcoal and HEPA filters. Due to the special nature of these penetrations, the allowable leak rate is less than those penetrations which would leak to the special ventilation zone. 52

The Safety Injection System, Internal Containment Spray System, and Residual Heat Removal (RHR) system are subject to containment sump water during their post-accident use. A radiological analysis was performed using the RHR system to demonstrate that the liquid leakage limit would not result in doses greater than the 10CFR Part 100 guidelines.(2) The conclusion of that analysis was that a 6 gph leak rate of containment sump water to the auxiliary building special ventilation zone would result in offsite doses below the 10CFR100 guidelines. Rev. A