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SUBJECT: Supports NRC decision that NSHC warranted in issuing license amend to Duke Power Co allowing performance of mass-plot calculations. NRC should issue guidance that mass-plot method acceptable to show compliance w/App J.

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September 11, 1986

Rules & Procedures Branch
Division of Rules and Records
Office of Administration
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Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Comments on Consideration of Issuance of Amendments to
Facility Operating Licenses for Duke Power Company,
Federal Register 30592, Wednesday, August 27, 1986,
Vol. 51 No. 166

WPSC supports the NRC in their decision that no significant hazards considerations are warranted in issuing a license amendment to the Duke Power Company which would allow them to perform mass-plot calculations on data acquired during a Containment Integrated Leak Rate Test (CILRT). We also agree with the NRC's conclusion that the mass-plot calculation provides a more accurate determination of containment leakage than either the total-time, or point-to-point methods.

An accurate representation of containment leakage is the ultimate goal of a CILRT. Unnecessarily conservative calculation; i.e., total time or mass point, may lead utilities to unnecessarily suspect the integrity of their containment structures. ANSI N56.8, which discusses the mass-plot method, was a result of the industry striving to improve in the area of containment leakage testing.

In review of Duke's proposed license amendment the NRC states, "Licensees who wish to use the mass-plot must submit an application for exemption from the Appendix J requirement that containment integrated leak rate tests will conform to N45.4." It is unfortunate when a technically superior alternative exists and is yet unacceptable to satisfy current regulatory requirements without an exemption. This type of situation undermines the drive for excellence expected of licensees by regulators.

BKG- 9/15/86

We feel it would be appropriate for the commission to issue guidance that the mass-plot method of data reduction is acceptable, without specific exemption to Appendix J, to show compliance with Appendix J. It would also be appropriate to consider the mass-plot method with the reduced duration CILRT discussed in BN-TOP-1, "Testing Criteria for Integrated Leakage Rate Testing of Primary Containment Structures for Nuclear Power Plants."

Sincerely,

Carlton Sieder for

D. C. Hintz
Vice President - Nuclear Power

GWH/jms

cc - Mr. G. E. Lear, US NRC
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