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AUTH.NAME AUTHOR AFFILIATION
 MUSOLF, D. Northern States Power Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
 Office of Nuclear Reactor Regulation, Director (Post 870411 R

SUBJECT: Requests exemption from 10CFR50, App J, Section III.A.3 re leakage test requirements for Type A containment.

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Northern States Power Company

414 Nicollet Mall
Minneapolis, Minnesota 55401
Telephone (612) 330-5500

August 1, 1988

10 CFR Part 50
Section 50.12

Director of Nuclear Reactor Regulation
Attn: Document Control Desk
Nuclear Regulatory Commission
Washington, D C 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Request for Exemption to 10 CFR Part 50,
Appendix J, Section III.A.3, Mass Point Method

The purpose of this letter is to request exemption from the requirements of 10 CFR Part 50, Appendix J, Section III.A.3, which specifies leakage test requirements for Type A containment integrated leakage rate tests. This Standard has been interpreted by the NRC Staff to require use of the total time and point-to-point methods of calculation. The mass point method is a newer calculation method recognized by the current industry standard, ANSI/ANS-56.8-1987. This exemption is needed to permit use of the mass point method of calculating leakage rate. Appendix J currently requires compliance with ANS N45.2-1972.

A proposed change to Appendix J which would revise the regulations to permit use of the mass point method was published in the Federal Register on February 29, 1988. The schedule for issuing this change as a final rule is uncertain, however. Use of the mass point method for the next Prairie Island Unit No. 1 integrated containment leakage test in late September, 1988 would be highly desirable. Therefore it is requested that review and approval of this request be completed by September 15, 1988.

A check in the amount of \$150.00 is enclosed in accordance with the requirements of 10 CFR Part 170 as the required application fee for this request.

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Director of NRR
August 1, 1988
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Basis for Request

It is requested that use of the mass point method to calculate leakage rates, as described in ANSI/ANS-56.8-1987, be approved for use at Northern States Power Company nuclear generating plants.

The mass point method is recognized by the current industry standard on containment leakage rate testing, ANSI/ANS-56.8-1987. It is a significantly improved method of processing leakage rate test data to obtain a measured leakage rate.

Exemption requests to use the mass plot method have been submitted by other licensees and have received the approval of the Commission.

Determination of Special Circumstances

Section 50.12, "Specific Exemptions," of 10 CFR Part 50 allows the Commission to consider granting an exemption when special circumstances are present. This exemption falls under the special circumstances provided for in Section 50.12(a)(2)(ii), which states that an exemption may be granted if, "application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule."

Section III.A.3 of Appendix J to 10 CFR Part 50 is being interpreted by the NRC Staff to require Type A containment test leakage rate be computed using methodology specified in a 1972 industry standard. Improved calculation methodology is available. The purpose of Appendix J is to assure containment integrity. Compliance with Section III.A.3 and the use of less than the best calculation method does not serve this purpose.

Please contact us if you have any questions related to this request.


David Musolf
Manager Nuclear Support Services

c: Regional Administrator, Region III, NRC
NRR Sr Project Manager, NRC
Sr Resident Inspector, NRC
G Charnoff

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

DOCKET NOS. 50-282
50-306

LETTER DATED AUGUST 1, 1988
EXEMPTION TO SECTION III.A.3 OF
10 CFR PART 50, APPENDIX J

Northern States Power Company, a Minnesota corporation, by this letter dated August 1, 1988 submits a request for exemption from selected requirements of 10 CFR Part 50, Appendix J.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By David Musolf
David Musolf
Manager Nuclear Support Services

On this 1st day of August 1988 before me a notary public in and for said County, personally appeared David Musolf, Manager Nuclear Support Services, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Northern States Power Company, that he knows the contents thereof, and that to the best of his knowledge, information, and belief the statements made in it are true and that it is not interposed for delay.

Judy L. Klapperick

