Attachment 1

EXISTING TECHNICAL SPECIFICATIONS

3.6 CONTAINMENT SYSTEMS

3.6.1 CONTAINMENT SPHERE

APPLICABILITY: Applies to the operating status of the containment sphere.

OBJECTIVE: To ensure containment integrity.

SPECIFICATION:

A. Leakage

The reactor coolant system temperature shall not be increased above 200°F if the containment leakage exceeds the maximum acceptable values specified in Specification 4.3.

B. Access to Containment

(1) Containment integrity shall not be violated unless the reactor coolant system is below 500 psig and a SHUTDOWN MARGIN greater than 1% Δk/k with all rods inserted is maintained for the most reactive temperature.

(2) Containment integrity shall not be violated when the reactor coolant system is open to the containment atmosphere unless a SHUTDOWN MARGIN greater than 5% Δk/k is maintained with all control rods inserted.

(3) Positive reactivity changes shall not be made by rod drive motion whenever the containment integrity is not intact. Boron dilution (resulting in positive reactivity) may be made when the containment integrity is not intact if a SHUTDOWN MARGIN greater than 5% Δk/k is maintained.

C. Internal Pressure

The reactor shall not be made critical, nor be allowed to remain critical, if the containment sphere internal pressure exceeds 0.4 psig, or the internal vacuum 2.0 psig.

BASIS: The basis for the SHUTDOWN MARGINS and 500 psig pressure are as follows:

Δk/k	Event	Basis for Adequacy
1% (below 500 psig)	Violation of Containment	Safety injection system disarmed; no credible automatic or operator action could cause return to criticality.

Δk/k	Event	Basis for Adequacy
5%	Open reactor coolant	Provides adequate margin so that maintenance activities can be carried out with the reactor head removed.(1)

Regarding internal pressure limitations, the containment design pressure of 46.4 psig would not be exceeded if the sphere internal pressure before a major loss of coolant accident was no greater than 0.4 psig. The design criteria also allows an internal vacuum not in excess of 2.0 psig. Thus, the specified limiting conditions for internal pressure are consistent with the design basis.(2) Although such design values could be exceeded without damage to the structure, it is considered that the importance of the containment function warrants the specified values.

Opening of the ventilation system backup valves, POV 9A and POV 10A, is not considered a violation of containment integrity during startup conditions provided that their corresponding in-line valves POV 9 and POV 10 are closed.

REFERENCES:

(1) Supplement No. 3 to Final Engineering Report and Safety Analysis, Question No. 2.

(2) Final Engineering Report and Safety Analysis, Paragraph 5.3.

4.3 CONTAINMENT SYSTEMS

4.3.1 CONTAINMENT TESTING

APPLICABILITY: Applies to containment leakage.

OBJECTIVE: To verify that leakage from the containment sphere is maintained within specified values.

SPECIFICATION: 1. Integrated Leakage Rate Tests, Type A

A. Test Pressure

In order to verify leakage from the containment sphere, a Type A test shall be performed. Type A tests shall consist of a peak pressure test or a reduced pressure test.

Peak pressure tests are conducted at a test pressure greater than or equal to 49.4 psig, and reduced pressure tests are conducted at a test pressure greater than or equal to 24.7 psig.

B. Acceptance Criteria

For the peak pressure test program the containment sphere leakage rate measured is less than 0.090 wt%/24 hours of the initial content of the containment air at the calculated peak pressure of 49.4 psig. For the reduced pressure test program to be conducted at 24.7 psig, the measured leakage rate shall be less than 0.064 wt%/24 hours of the initial content of the containment atmosphere at the calculated peak pressure of 49.4 psig.

The accuracy of each Type A test is verified by a supplemental test which (1) confirms the accuracy of the Type A test by verifying that the difference between supplemental and Type A test data is within 25% of 0.12 wt%/24 hours for the peak pressure test or 0.085 wt%/24 hours for the reduced pressure test, and (2) requires the quantity of air bled from or injected into the containment during the supplemental test to be equivalent to at least 75 percent of the total allowable leakage rate at 49.4 psig.

C. Frequency

A set of 3 periodic Type A tests are performed at 40 ± 10 month intervals during each 10-year service period. The third test of each set is performed when the plant is shut down for the 10-year plant inservice inspection. The permissible period for Type A testing shall be limited to periods when the plant facility is nonoperational and secured in the shutdown condition.

If any periodic Type A test fails to meet the acceptance criteria above, the test schedule applicable to subsequent Type A tests shall be submitted to the NRC for review and approval. If two consecutive periodic Type A tests fail to meet the above acceptance criteria, a Type A test is performed at each plant shutdown for refueling or approximately every 18 months, whichever occurs first, until two consecutive Type A tests meet the acceptance criteria, after which time the normal test schedule may be resumed.

II. Containment Penetration Leakage Rate Tests (Type B)

A. Test Pressure

Type B tests are conducted at a test pressure at or above 49.4 psig. Personnel airlocks are tested every six months at or above 49.4 psig. In addition, a lower pressure test at or above 10 psig is performed on the personnel airlocks as required by Section II.C.

B. Acceptance Criteria

The combined leakage rate of all penetrations subject to Type B tests and all containment isolation valves subject to Type C tests is less than 0.072 wt%/24 hours of the initial content of the containment atmosphere at the calculated peak pressure of 49.4 psig.

C. Test Schedule

Type B tests, except for airlocks, are performed during every reactor shutdown for refueling, or other convenient intervals, but in no case at intervals greater than two years.

Airlock volumes between the doors are tested:

(1) at least every six months and

(2) within 72 hours following each closing, except when the airlock is being used for multiple entries, then at least once per 72 hours, at or above 10 psig test pressure, and

(3) prior to establishing CONTAINMENT INTEGRITY when maintenance has been performed on the airlock that could affect the airlock sealing capability at 49.4 psig.*

III. Containment Isolation Valve Leakage Rate Tests (Type C)

A. Test Pressure

Type C tests are conducted in accordance with the criteria specified in Appendix J of 10 CFR 50.

These Type C tests are conducted at a test pressure at or above 49.4 psig.

B. Acceptance Criteria (Maximum acceptable value)

The combined leakage rate of all penetrations subject to Type B tests and all containment isolation valves subject to Type C tests is less than .072 wt%/24 hours of the initial content of the containment atmosphere at the calculated peak pressure of 49.4 psig.

C. Test Schedule

Type C tests are performed during each reactor shutdown for refueling, or other convenient intervals, but in no case at intervals greater than two years.

Seal tests conducted on active containment ventilation isolation valves shall be performed every three months.

Seal tests conducted on passive containment ventilation isolation valves shall be performed every six months.

IV. Recirculation System

A. Test Pressure

Leak tests shall be performed on portions of the Safety Injection System used for recirculation at a pressure equal to or greater than the operating pressure under accident conditions. The test fluid shall be water.

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*Exemption to Appendix J of 10 CFR 50

B. Acceptance Criteria

Visual inspection for leakage shall be made and if leakage can be detected, measurements of such leakage shall be made. The maximum effective leakage shall be maintained in accordance with Section 3.3.1.A(4) of Appendix A Technical Specifications.

C. Test Schedule

Visual inspections of the recirculation loop outside containment (including the Containment Spray System)) shall be made at intervals not to exceed the normal plant refueling interval. In addition, pumps and valves of the recirculation loop outside containment which are used during normal operation, shall be visually inspected for leakage at intervals not to exceed once every six months.

V. Test Result Report

The results of Type A, B, and C leakage rate tests are submitted to the NRC in a summary technical report approximately three months after the conduct of the Type A tests. This report contains an analysis and interpretation of the Type A test results and a summary of periodic Type B and C tests performed since the last Type A test. Leakage rate test results from Type A tests that fail to meet the acceptance criteria specified in Section I.B above are reported in a separate attached summary report that includes an analysis of the test data, an instrumentation error analysis, and the structural conditions of the containment or components, if any, which contributed to failure in meeting the acceptance criteria. Results and analysis of the supplemental verification test used to demonstrate the validity of the Type A test measurements are included.

VI. Containment Modification

Any major modification or replacement of a component that is part of the containment boundary is followed by Type A, B, or C tests as applicable. The results of such tests are included in the test result report described above and meet the respective acceptance criteria. Minor modifications or replacements performed directly prior to the conduct of a scheduled Type A test do not require a separate test.

BASIS: The containment system is one of the major engineered safety features and is a consequence-limiting system. It represents the final physical barrier that, in the event of a loss-of-coolant accident (LOCA), protects against the inadvertent release of fission products.

I. Leakage Rate Testing

Periodic containment integrated leakage rate tests are performed at or above 49.4 psig or at or above 24.7 psig for the reduced pressure test program. The leak rate will be calculated using the formulas of Reference 2 (Total Time) and Reference 3 (Mass Point).

Test schedules and the acceptance criteria specified herein are established based on the requirements of 10 CFR 50, Appendix J.(1) A containment leakage rate of 0.12 wt% of the initial content of containment atmosphere at 49.4 psig/24 hours maintains public exposure well below 10 CFR 100 values in the event of a hypothetical LOCA.(4) This leakage rate also limits public exposure to 10 CFR 100 values even if a complete core meltdown is postulated.

The acceptance criteria for

(1) Type A test is 75% of the containment leakage rate specified above

(2) Type B and Type C tests combined is 60% of the containment leakage rate specified above.

to allow for possible deterioration of the containment boundary between tests.

II. Recirculation System Testing

The portion of the Recirculation system outside the containment sphere is effectively an extension of the boundary of the containment.

Leakage from this system shall be maintained at as low as practical levels. The effective leakage of this system shall be maintained in accordance with the maximum leakage limitations established in Section 3.3.1.A(4) of Appendix A Technical Specifications.

The piping configurations of the recirculation and containment spray lines assure that leakage within Technical Specification limits will not deplete the isolation valve seal water system fluid inventory for at least 30 days at a pressure of 1.10 Pa. Therefore,

leakage from the isolation valves and containment penetrations for these systems is not added to the combined leakage rate for all penetrations and valves subject to Type B and C tests.

The containment penetrations encompassed by the recirculation and containment spray systems include penetrations for one containment spray line, three reactor coolant pump seal water injection lines, and the recirculation pump discharge line to the recirculation heat exchanger.

REFERENCES:

(1) 10 CFR 50, Appendix J.

(2) ANSI N45.4-1972

(3) ANSI/ANS 56.8-1981

(4) Final Engineering Report and Safety Analysis, Paragraph 5.3

Attachment 2

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3.6 CONTAINMENT SYSTEMS

3.6.1 CONTAINMENT SPHERE

APPLICABILITY: Applies to the operating status of the containment sphere.

OBJECTIVE: To ensure containment integrity.

SPECIFICATION:

A. Leakage

The reactor coolant system temperature shall not be increased above 200°F if the containment leakage exceeds the maximum acceptable values specified in Specification 4.3.

B. Access to Containment

(1) Containment integrity shall not be violated unless the reactor coolant system is below 500 psig and a SHUTDOWN MARGIN greater than 1% Δk/k with all rods inserted is maintained for the most reactive temperature.

(2) Containment integrity shall not be violated when the reactor coolant system is open to the containment atmosphere unless a SHUTDOWN MARGIN greater than 5% Δk/k is maintained with all control rods inserted.

(3) Positive reactivity changes shall not be made by rod drive motion whenever the containment integrity is not intact. Boron dilution (resulting in positive reactivity) may be made when the containment integrity is not intact if a SHUTDOWN MARGIN greater than 5% Δk/k is maintained.

C. Internal Pressure

The reactor shall not be made critical, nor be allowed to remain critical, if the containment sphere internal pressure exceeds 0.4 psig, or the internal vacuum 2.0 psig.

BASIS: The basis for the SHUTDOWN MARGINS and 500 psig pressure are as follows:

Δk/k	Event	Basis for Adequacy
1% (below 500 psig)	Violation of Containment	Safety injection system disarmed; no credible automatic or operator action could cause return to criticality.

Δk/k	Event	Basis for Adequacy
5%	Open reactor coolant	Provides adequate margin so that maintenance activities can be carried out with the reactor head removed.(1)

The maximum internal pressure of the containment sphere during operation is 0.4 psig. This value assures that the pressure inside containment following a design basis accident will not exceed the peak calculated value of 52.0 psig. The design criteria also allows an internal vacuum not in excess of 2.0 psig. Thus, the specified limiting conditions for internal pressure assure that the design basis of the containment sphere will not be exceeded during a worst case accident. Although such design values could be exceeded without damage to the structure, it is considered that the importance of the containment function warrants the specified values.

Opening of the ventilation system backup valves, POV 9A and POV 10A, is not considered a violation of containment integrity during startup conditions provided that their corresponding in-line valves POV 9 and POV 10 are closed.

REFERENCE:

(1) Supplement No. 3 to Final Engineering Report and Safety Analysis, Question No. 2.

4.3 CONTAINMENT SYSTEMS

4.3.1 CONTAINMENT TESTING

APPLICABILITY: Applies to containment leakage.

OBJECTIVE: To verify that leakage from the containment sphere is maintained within specified values.

SPECIFICATION: I. Integrated Leakage Rate Tests, Type A

A. Test Pressure

In order to verify leakage from the containment sphere, a Type A test shall be performed. Type A tests shall consist of a peak pressure test or a reduced pressure test.

Peak pressure tests are conducted at a test pressure greater than or equal to 52.0 psig, and reduced pressure tests are conducted at a test pressure greater than or equal to 26.0 psig.

B. Acceptance Criteria

For the peak pressure test program the containment sphere leakage rate measured is less than 0.090 wt%/24 hours of the initial content of the containment air at the calculated peak pressure of 52.0 psig. For the reduced pressure test program to be conducted at 26.0 psig, the measured leakage rate shall be less than 0.064 wt%/24 hours of the initial content of the containment atmosphere at the calculated peak pressure of 52.0 psig.

The accuracy of each Type A test is verified by a supplemental test which (1) confirms the accuracy of the Type A test by verifying that the difference between supplemental and Type A test data is within 25% of 0.12 wt%/24 hours for the peak pressure test or 0.085 wt%/24 hours for the reduced pressure test, and (2) requires the quantity of air bled from or injected into the containment during the supplemental test to be equivalent to at least 25 percent of the total measured leakage at 52.0 psig or 26.0 psig, whichever is applicable.

C. Frequency

Type A tests shall be performed at 40 ± 10 month intervals. Type A testing shall be conducted during periods when the unit is nonoperational and secured in the shutdown condition.

If any periodic Type A test fails to meet the acceptance criteria above, the test schedule applicable to subsequent Type A tests shall be submitted to the NRC for review and approval. If two consecutive periodic Type A tests fail to meet the above acceptance criteria, a Type A test is performed at each plant shutdown for refueling or approximately every 18 months, whichever occurs first, until two consecutive Type A tests meet the acceptance criteria, after which time the normal test schedule may be resumed.

The provisions of Specification 4.0.2 are not applicable.

II. Containment Penetration Leakage Rate Tests (Type B)

A. Test Pressure

Type B tests are conducted at a test pressure at or above 52.0 psig. Personnel airlocks are tested every six months at or above 52.0 psig. In addition, a lower pressure test at or above 10 psig is performed on the personnel airlocks as required by Section II.C.

B. Acceptance Criteria

The combined leakage rate of all penetrations subject to Type B tests and all containment isolation valves subject to Type C tests is less than 0.072 wt%/24 hours of the initial content of the containment atmosphere at the calculated peak pressure of 52.0 psig.

C. Test Schedule

Type B tests, except for airlocks, are performed during every reactor shutdown for refueling, or other convenient intervals, but in no case at intervals greater than two years.

Airlock volumes between the doors are tested:

(1) at least every six months and

(2) within 72 hours following each closing, except when the airlock is being used for multiple entries, then at least once per 72 hours, at or above 10 psig test pressure, and

(3) prior to establishing CONTAINMENT INTEGRITY when maintenance has been performed on the airlock that could affect the airlock sealing capability at 52.0 psig.*

III. Containment Isolation Valve Leakage Rate Tests (Type C)

A. Test Pressure

Type C tests are conducted in accordance with the criteria specified in Appendix J of 10 CFR 50.

These Type C tests are conducted at a test pressure at or above 52.0 psig.

B. Acceptance Criteria (Maximum acceptable value)

The combined leakage rate of all penetrations subject to Type B tests and all containment isolation valves subject to Type C tests is less than .072 wt%/24 hours of the initial content of the containment atmosphere at the calculated peak pressure of 52.0 psig.

C. Test Schedule

Type C tests are performed during each reactor shutdown for refueling, or other convenient intervals, but in no case at intervals greater than two years.

Seal tests conducted on active containment ventilation isolation valves shall be performed every three months.

Seal tests conducted on passive containment ventilation isolation valves shall be performed every six months.

IV. Recirculation System

A. Test Pressure

Leak tests shall be performed on portions of the Safety Injection System used for recirculation at a pressure equal to or greater than the operating pressure under accident conditions. The test fluid shall be water.

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*Exemption to Appendix J of 10 CFR 50

B. Acceptance Criteria

Visual inspection for leakage shall be made and if leakage can be detected, measurements of such leakage shall be made. The maximum effective leakage shall be maintained in accordance with Section 3.3.1.A(4) of Appendix A Technical Specifications.

C. Test Schedule

Visual inspections of the recirculation loop outside containment (including the Containment Spray System)) shall be made at intervals not to exceed the normal plant refueling interval. In addition, pumps and valves of the recirculation loop outside containment which are used during normal operation, shall be visually inspected for leakage at intervals not to exceed once every six months.

V. Test Result Report

The results of Type A, B, and C leakage rate tests are submitted to the NRC in a summary technical report approximately three months after the conduct of the Type A tests. This report contains an analysis and interpretation of the Type A test results and a summary of periodic Type B and C tests performed since the last Type A test. Leakage rate test results from Type A tests that fail to meet the acceptance criteria specified in Section I.B above are reported in a separate attached summary report that includes an analysis of the test data, an instrumentation error analysis, and the structural conditions of the containment or components, if any, which contributed to failure in meeting the acceptance criteria. Results and analysis of the supplemental verification test used to demonstrate the validity of the Type A test measurements are included.

VI. Containment Modification

Any major modification or replacement of a component that is part of the containment boundary is followed by Type A, B, or C tests as applicable. The results of such tests are included in the test result report described above and meet the respective acceptance criteria. Minor modifications or replacements performed directly prior to the conduct of a scheduled Type A test do not require a separate test.

BASIS: The containment system is one of the major engineered safety features and is a consequence-limiting system, it represents the final physical barrier that, in the event of a loss-of-coolant accident (LOCA), protects against the inadvertent release of fission products.

I. Leakage Rate Testing

Periodic containment integrated leakage rate tests are performed at or above 52.0 psig or at or above 26.0 psig for the reduced pressure test program. The leak rate will be calculated using the formulas of Reference 2 (Total Time) and Reference 3 (Mass Point).

Test schedules and the acceptance criteria specified herein are established based on the requirements of 10 CFR 50, Appendix J.[1] A containment leakage rate of 0.12 wt% of the initial content of containment atmosphere at 52.0 psig/24 hours maintains public exposure well below 10 CFR 100 values in the event of a hypothetical LOCA.[4] This leakage rate also limits public exposure to 10 CFR 100 values even if a complete core meltdown is postulated.

The acceptance criteria for

(1) Type A test is 75% of the containment leakage rate specified above

(2) Type B and Type C tests combined is 60% of the containment leakage rate specified above.

to allow for possible deterioration of the containment boundary between tests.

II. Recirculation System Testing

The portion of the Recirculation system outside the containment sphere is effectively an extension of the boundary of the containment.

Leakage from this system shall be maintained at as low as practical levels. The effective leakage of this system shall be maintained in accordance with the maximum leakage limitations established in Section 3.3.1.A(4) of Appendix A Technical Specifications.

The piping configurations of the recirculation and containment spray lines assure that leakage within Technical Specification limits will not deplete the isolation valve seal water system fluid inventory for at least 30 days at a pressure of 1.10 Pa. Therefore,

leakage from the isolation valves and containment penetrations for these systems is not added to the combined leakage rate for all penetrations and valves subject to Type B and C tests.

The containment penetrations encompassed by the recirculation and containment spray systems include penetrations for one containment spray line, three reactor coolant pump seal water injection lines, and the recirculation pump discharge line to the recirculation heat exchanger.

REFERENCES:

(1) 10 CFR 50, Appendix J.

(2) ANSI N45.4-1972

(3) ANSI/ANS 56.8-1981

(4) Final Engineering Report and Safety Analysis, Paragraph 5.3

Enclosure 2

REQUEST FOR EXEMPTION

10 CFR 50, APPENDIX J, SECTION III.D.1(a)

"PERIODIC RETEST SCHEDULE"

FOR

SAN ONOFRE NUCLEAR GENERATING STATION UNIT 1

1. INTRODUCTION

1.1 PURPOSE

This submittal provides information in support of a request for an exemption pursuant to Title 10 of the Code of Federal Regulations Part 50.12, "Specific Exemptions," from a requirement of 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," for San Onofre Nuclear Generating Station, Unit 1. Specifically, an exemption is requested to the requirements of 10 CFR 50, Appendix J, Section III.D.1(a), "Periodic Retest Schedule."

1.2 BACKGROUND

1.2.1 10 CFR 50, Appendix J, Section III.D.1(a) Requirements

10 CFR 50, Appendix J establishes specific acceptance criteria for preoperational testing and periodic verification by tests of the leak-tight integrity of the primary reactor containment. The purpose of the Appendix J tests are to ensure that:

(a) leakage through the primary reactor containment and systems and components penetrating primary containment shall not exceed allowable leakage rate values as specified in the technical specifications or associated bases,

(Type A Test)

(b) periodic surveillance of reactor containment penetrations and isolation valves is performed so that proper maintenance and repairs are made during the service life of the containment, and systems and components penetrating primary containment.

(Type B and C Tests)

The Type A tests, in part, satisfy the requirements of 10 CFR 50, Appendix J. 10 CFR 50, Appendix J, Section III.D.1(a) requires a set of three Type A Containment integrated leakage rate tests (ILRTs) to be performed at approximately equal intervals during each 10-year plant Inservice Inspection (ISI). The requirement to perform the ISI is governed by 10 CFR 50.55a, "Codes and Standards."

1.2.2 Criteria for Exemptions - 10 CFR 50.12 Requirements

The NRC has established certain criteria which permit Licensees to request specific exemptions to its rules and regulations provided special circumstances exist. These requirements are embodied in 10 CFR 50.12, "Specific Exemptions," and in part, are as follows:

(a) The Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of the regulations of this part, which are --

(1) Authorized by the law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security.

(2) The Commission will not consider granting an exemption unless special circumstances are present.

Conditions that are considered special circumstances are also identified in 10 CFR 50.12. The special circumstances relevant to SCE's request are presented below:

(ii) 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,

(iii) Compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted, or that are significantly in excess of those incurred by others similarly situated.

2. REQUEST FOR EXEMPTION

The two programs, the Containment ILRT and the 10-year ISI, are unrelated to one another and can be performed irrespective of one another. The apparent purpose for requiring the third Type A test to be performed during shutdown for the 10-year plant ISI, is to assure that the three Type A tests are not performed during the first 90 months of the 10-year operation cycle. This requirement provides assurance that the three Type A tests are evenly spaced over the 10-year interval.

ASME Boiler & Pressure Vessel Code for mechanical systems and components establishes the 10-year inservice inspection period. The purpose of the inspection program is to ensure that structural integrity of Class 1, 2 and 3 components are maintained in accordance with the requirements of ASME Code Section XI. The 10-year Reactor Vessel ISI is a part of the entire program.

Compliance with 10 CFR 50, Appendix J, Section III.D.1(a), to perform a Type A test and the 10-year ISI during the same outage, does not appear to serve the underlying purpose of the rule. The purpose of the Appendix J test is to ensure that leakage through the primary reactor Containment, and systems and components penetrating Containment, does not exceed allowable leakage values specified in Technical Specification 4.3.1, "Containment Testing." Conducting the third Type A test during the same outage as the shutdown for the 10-year plant ISI does not enhance the purpose, or provide further assurance of Containment integrity above that which has already been demonstrated.

Due to SCE's extension of the 10 year plant ISI caused by extended plant outages, a conflict occurred in performing the third ILRT along with the 10 year plant ISI. Specifically, our letter dated August 2, 1988, indicated the 10 year ISI expiration date was November 30, 1991. Implementation of the 40 ± 10 month interval required that an ILRT be performed during the Spring of 1988. Accordingly, the plant was shutdown to perform the ILRT, but the shutdown and test did not meet the criterion that the third test of each set be performed during the 10 year ISI outage. In summary, the existing specification for ILRT frequency does not accommodate extensions of the 10 year ISI interval.

Therefore, pursuant to 10 CFR 50.12(a)(2)(ii), and 10 CFR 50.12(A)(2)(iii), SCE requests an exemption to the requirements of 10 CFR 50, Appendix J, Section III.D.1(a). The containment Type A integrated leak rate tests will be performed on a 40 ± 10 month schedule.