

TSTF

 Technical Specifications Task Force  
 A Joint Owners Group Activity

## Relocation of Calculated Peak Containment Internal Pressure ( $P_a$ ) to Licensee Control

Standard Tech Specs Administrative Controls, [Primary]  
 Containment Leakage Rate Testing Program, Option B, states the following:

- b. *The **calculated peak containment internal pressure for the design basis loss of coolant accident,  $P_a$ , is [45 psig]. The containment design pressure is [50 psig].***
- c. *The maximum allowable containment leakage rate,  $L_a$ , at  $P_a$ , shall be [%] of containment air weight per day.*
- d. *Leakage rate acceptance criteria are:*
  2. *Air lock testing acceptance criteria are:*
    - a) *Overall air lock leakage rate is  $\leq [0.05 L_a]$  when tested at  $\geq P_a$ .*

Note that paragraph b states the exact value of  $P_a$ , not a limit.

(Continued)

TSTF

 Technical Specifications Task Force  
 A Joint Owners Group Activity

## Relocation of Calculated Peak Containment Internal Pressure ( $P_a$ ) to Licensee Control

- Recently, some NSSS vendors have identified errors in the input values or calculations of peak containment internal pressure. The difference between the TS and recalculated values are typically small and encompassed by the pressure used for performing the containment leak rate tests.
- However, because the TS specify the exact value and not a limit, a change to the TS is required.
  - We have identified at least five license amendment requests that have been submitted or are under development.

(Continued)

TSTF

Technical Specifications Task Force  
*A Joint Owners Group Activity*

## Relocation of Calculated Peak Containment Internal Pressure (Pa) to Licensee Control

- The Statements of Consideration for Appendix J, Option B (9/26/95) state that  $P_a$  is specified in the TS. Therefore, TSTF-52 (which implemented Appendix J, Option B) included  $P_a$  in the TS.
- An August 2007 FRN added "or associated bases," allowing the  $P_a$  value to be located in the TS or the Bases.
- The TSTF is interested in pursuing a change to the STS to either relocate the  $P_a$  value to the Bases or to replace the exact value with a limit:
  - *The calculated peak containment internal pressure for the design basis loss of coolant accident,  $P_a$ , is  $\leq$  [45 psig].*

(Continued)

TSTF

Technical Specifications Task Force  
*A Joint Owners Group Activity*

## Relocation of Calculated Peak Containment Internal Pressure (Pa) to Licensee Control

- Does the NRC staff see any roadblocks to relocating the  $P_a$  value to the Bases, with control of future changes under 50.59?
- Does the NRC staff see any roadblocks to replacing the  $P_a$  exact value with an upper limit, which would be used for leak rate testing?