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 RECIP. NAME: DENTON, H.R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director
 STOLZ, J.F. Operating Reactors Branch 4

SUBJECT: Forwards proposed Tech Specs re containment air lock testing, supplementing 801229 submittal. Discussion of proposed implementation of 10CFR50, App J, III, D.2 encl.

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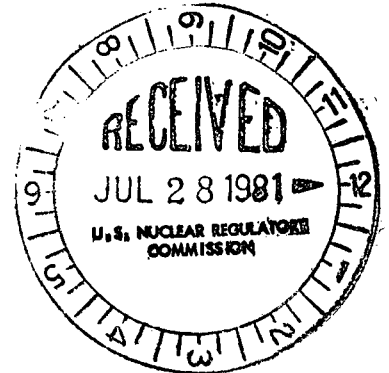
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July 24, 1981

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. J. F. Stolz, Chief
Operating Reactors Branch No. 4

Re: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287



This letter supplements my submittal of December 29, 1980 and addresses containment air lock testing.

On October 22, 1980, the NRC amended 10 CFR 50, Appendix J to permit greater flexibility for leak testing of containment building air locks in the case of frequent use of the air locks. Attachment 1 provides a discussion of the proposed implementation of 10 CFR 50, Appendix J, III.D.2 at Oconee Nuclear Station. Attachment 2 provides the proposed Technical Specification Revision to incorporate containment air lock testing.

Inasmuch as this request supplements an earlier request on this subject, it has been determined that no license fees are required.

Very truly yours,

A handwritten signature in dark ink, appearing to read "William O. Parker, Jr.", written over a horizontal line.

William O. Parker, Jr.

RLG/php
Attachment

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DUKE POWER COMPANY

OCONEE NUCLEAR STATION

ATTACHMENT 1

Duke Power Company

Oconee Nuclear Station

Proposed Implementation of 10 CFR50, Appendix J, III.D.2

Requirement III.D.2.(a) - "If opened following a Type A or B test, containment penetrations subject to Type B testing shall be Type B tested prior to returning the reactor to an operating mode requiring containment integrity."

Implementation - See the Implementation of Requirement III.D.2.(b)(ii).

Requirement III.D.2.(b)(i) - "Air locks shall be tested prior to initial fuel loading and at 6-month intervals thereafter at an internal pressure not less than Pa."

Implementation - Reactor Building Personnel and Emergency Hatches (air locks) will be tested quarterly at an internal pressure not less than 59 psi. The hatch leak test will be performed in the following manner:

1. The Oconee containment air locks, manufactured by the W. J. Woolley Co., have two doors and three seals (two on the outer door and one on the inner door). Each seal and sealing surface is pressure seated.
2. Testing of the air locks is accomplished by installing a restraint on the airlock side of the inner door and then pressurizing the airlock to 59 psi. A leak rate is established and, if acceptable, the test is terminated. If the leak rate is unacceptable, repairs to one or more of the doors may be necessary. Entry to containment may also be necessary. Entry to containment may also be necessary through the alternate hatch, to effect repairs on the containment side of the inner door. Once repairs are effected, the test is conducted until acceptable results are obtained.
3. Opening of the alternate hatch requires that hatch to be tested by either the full air leakage test or the leak test discussed in the implementation of Requirement III.D.2.(b)(iii).
4. Upon completion of the air leak test, the air lock is depressurized and the outer door opened to remove the restraints on the inner door. Such opening is not considered to be an entry. The outer door and seal will be inspected to assure that no damage has occurred to the seal or seating surface. If any damage is found, it will be repaired and the air lock will be retested. Otherwise, the air lock test will be considered complete.

Requirement III.D.2.(b)(ii) - "Air locks opened during periods when containment integrity is not required by the plant's Technical Specifications shall be tested at the end of such periods at not less than Pa."

Implementation - If a hatch remains closed during the period in which containment integrity is not required, the hatch does not have to be tested unless otherwise required by the surveillance period. (i.e., implementation of Requirement III.D.2.(b)(i)) If a hatch is opened during the period when containment integrity is not required, it will be tested at the end of such period (i.e., prior to returning the reactor to an operating mode requiring containment integrity) at not less than 59 psi.

If the Emergency Hatch has to be opened to effect repairs to the containment side of the inner door during the performance of a leak test of the Personnel Hatch, or vice versa, then the former hatch can be tested by the leak test discussed in the implementation of Requirement III.D.2.(b)(iii) or by performing a full air lock leak test, (if required by III.D.2.(b)(i)).

Requirement III.D.2.(b)(iii) - (1) "Air locks opened during periods when containment integrity is required by the plant's Technical Specification shall be tested within 3 days after being opened." (2) "For air lock doors opened more frequently than once every 3 days, the air lock shall be tested at least once every 3 days during the period of frequent openings." (3) "In the event that the testing for this 3-day interval cannot be at Pa, the test pressure shall be as stated in the Technical Specifications."

Implementation - In lieu of performing the full hatch air leakage test under the conditions of this requirement, it is intended that a leak test of the air lock outer door seals be conducted to assure seal and containment integrity. The following is a discussion of the test method:

1. When containment integrity is required, a leak test of the outer door seals or full hatch of the affected air lock will be performed within 3 days of initial opening, and during periods of frequent use, at least once every three days.
2. The door seal leak test will consist of pressurizing between the double seal of the outer door Pa (59 psig) and measuring the leakage. The door will be held in place using two strongback clamps. Upon satisfactory completion of the test, the strongbacks will be removed and stored outside the hatch, thus eliminating the opening of the outer door after the test.
3. The seal leak test will not be substituted for the quarterly air lock leak test conducted to meet requirement III.D.2(b)(iii).

Requirement III.D.2.(b)(iv) - "The acceptance criteria for air lock testing shall be stated in the Technical Specification."

Implementation Attachment 2 provides the proposed Technical Specification revision to meet this requirement.