

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL

FILE NUMBER

TO:
Mr. A. Schwencer

FROM:
Duke Power Company
Charlotte, North Carolina
Mr. William O. Parker, Jr.

DATE OF DOCUMENT
2/15/77

DATE RECEIVED
2/17/77

LETTER
 ORIGINAL
 COPY

NOTORIZED
 UNCLASSIFIED

PROP

INPUT FORM

NUMBER OF COPIES RECEIVED
One signed

DESCRIPTION

Ltr. re their 9/5/75, and 12/28/76 ltrs. and our 11/23/76 ltr....concerning the testing of containment air locks.....

PLANT NAME: Ocone Units 1-2-3 (2-P)

ENCLOSURE

**ACKNOWLEDGED
DO NOT REMOVE**

SAFETY		FOR ACTION/INFORMATION		ENVIRO	2/22/77	RJL
ASSIGNED AD:		ASSIGNED AD:				
<input checked="" type="checkbox"/> BRANCH CHIEF:	Schwencer (5)	<input checked="" type="checkbox"/> BRANCH CHIEF:				
<input checked="" type="checkbox"/> PROJECT MANAGER:	Neighbors	<input checked="" type="checkbox"/> PROJECT MANAGER:				
<input checked="" type="checkbox"/> LIC. ASST. :	Sheppard	<input checked="" type="checkbox"/> LIC. ASST. :				

INTERNAL DISTRIBUTION			
<input checked="" type="checkbox"/> REG. FILE	SYSTEMS SAFETY	PLANT SYSTEMS	SITE SAFETY & ENVIRO ANALYSIS
<input checked="" type="checkbox"/> NRC PDR	HEINEMAN	TEDESCO	DENTON & MULLER
<input checked="" type="checkbox"/> I & E (2)	SCHROEDER	BENAROYA	
<input checked="" type="checkbox"/> OELD		LAINAS	
<input checked="" type="checkbox"/> GOSSICK & STAFF	ENGINEERING	IPPOLITO	ENVIRO TECH.
MIPC	MACARRY	KIRKWOOD	ERNST
CASE	BOSNAK		BALLARD
HANAUER	SIHWELL	OPERATING REACTORS	SPANGLER
HARLESS	PAWLICKI	STELLO	
			SITE TECH.
PROJECT MANAGEMENT	REACTOR SAFETY	OPERATING TECH.	GAMMILL
BOYD	ROSS	<input checked="" type="checkbox"/> EISENHUT	STEPP
P. COLLINS	NOVAK	<input checked="" type="checkbox"/> SHAO	HULMAN
HOUSTON	ROSZTOCZY	<input checked="" type="checkbox"/> BAER	
PETERSON	CHECK	<input checked="" type="checkbox"/> BUTLER	SITE ANALYSIS
MELTZ		<input checked="" type="checkbox"/> GRIMES	VOLLMER
HELTEMES	AT & I		BUNCH
SKOVHOLT	SALTZMAN		<input checked="" type="checkbox"/> J. COLLINS
	RUTBERG		KREGER

EXTERNAL DISTRIBUTION			CONTROL NUMBER
<input checked="" type="checkbox"/> LPDR:Walhalla, S. C.	NAT. LAB:	BROOKHAVEN NAT. LAB.	9 1715
<input checked="" type="checkbox"/> TIC:	REG V.IE	ULRIKSON (ORNL)	
<input checked="" type="checkbox"/> NSIC:	LA PDR		
<input checked="" type="checkbox"/> ASLB:	CONSULTANTS:		
<input checked="" type="checkbox"/> ACRS 16 CYS HOLDING/SENT: CAT. B. (2/17/77)			

DUKE POWER COMPANY

POWER BUILDING

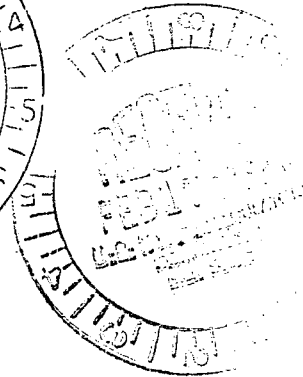
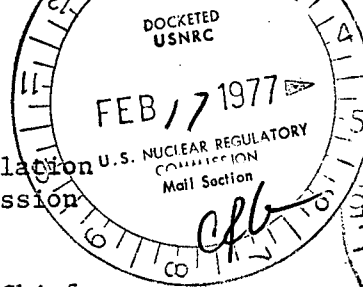
422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

Regulatory Docket File
February 15, 1977

TELEPHONE: AREA 704
373-4083

Mr. Benard C. Rusche, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Attention: Mr. A. Schwencer, Chief
Operating Reactor Branch #1

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

Dear Sir:

My letter of September 5, 1975 requested an exemption from the provisions of 10CFR50, Appendix J concerning the testing of containment air locks. As described in that letter, it was considered that the Oconee Technical Specifications were not in conformance with 10CFR50, Appendix J. Specifically, the Oconee Technical Specifications require testing of the airlocks at four month intervals except when the airlocks are not opened; and in no case at intervals greater than 12 months. Appendix J requires a Type B test of containment airlocks at six month intervals; however, these airlocks which are opened during such intervals are also to be tested after each opening.

Your letter of November 23, 1976 stated that insufficient justification had been provided to support the difference between the Oconee Technical Specification and 10CFR50, Appendix J. Your letter also described an acceptable approach to meeting the objectives of Appendix J. That approach would require, at six month intervals, that the entire airlock assembly be tested at the peak pressure P_a . Additionally, should the airlock be opened during the interval between the six month tests, the method proposed would require that airlock door seals be tested within 72 hours of every first opening of a series of openings. This leak test may be performed at a lower pressure (e.g., manufacturer's recommended pressure) and the results conservatively extrapolated to a leakage rate at the accident pressure, P_a .

Our review of your letter, in the time permitted, resulted in the conclusion that this interpretation of the intent of 10CFR50, Appendix J would provide a suitable alternative for the testing of Oconee containment airlocks and this was communicated in our December 28, 1976 letter. Subsequently, tests have been attempted in which the area between the double seals on the outer airlock door was to have been pressurized to 15 psig.

1715

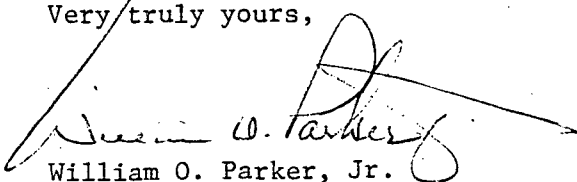
Mr. Benard C. Rusche, Director
Page 2
February 15, 1977

At a pressure of 3 psig, the door unseats and aborts the test. Discussions with the vendor, The W. J. Woolley Co. have revealed that the unique design of the Oconee containment airlocks prevents testing in this manner without modifications to the airlock to enable acceptance of test clamps. Containment airlocks of newer designs do have the capability to test airlocks without the use of these test clamps, however, the Oconee airlocks could not be tested without the use of clamps, i.e., without modification.

Testing of the Oconee containment airlocks is accomplished by pressurizing the airlock between the inner and outer doors. This test tends to seat the outer door and unseat the inner door. In order to complete the test, a restraint is placed on the airlock side of the inner door to physically restrain the door from lifting off its seat. After the test is completed, the airlock must be opened to remove the restraints, thereby negating the test since the airlock must again be tested. Therefore, in consideration of the design of the Oconee airlocks, it is not practical to require the testing of the door seals within 72 hours of each of a series of openings because of the effort required in installing restraints on the inner door and the length of time necessary to complete the test.

The Oconee airlocks have three seals (two on the outer door and one on the inner door) to assure containment integrity in the event of a loss of coolant accident. Each seal and sealing surface is pressure seated. Periodic testing of the containment airlock provides assurance on a continuing basis that the airlock and its seals provide containment integrity. It is highly unlikely that all three of these seals would become damaged or improperly seated during airlock usage. It is therefore requested that the exemption to the provisions of 10CFR50, Appendix J requested by my letter of September 5, 1975 be granted and testing described in the present Oconee Technical Specifications be permitted to continue.

Very truly yours,



William O. Parker, Jr.

MST:ge