

of SSER 5)." The licensee concludes that this prior exemption will no longer be needed once Option B is implemented because, unlike Option A, Option B does not include a requirement that air locks opened during periods when containment integrity was not required by the plant's TS be tested at the end of such periods. The NRC staff agrees that this exemption is not needed under Option B and, therefore, finds the proposed deletion acceptable.

Under Option B, a licensee may choose the performance-based option for performing (1) Type A tests, (2) Type B and C tests, or (3) Type A, B, and C tests. For Unit 2, the licensee has elected to perform Type A, B, and C testing on a performance basis.

The NRC staff finds the TS changes proposed by the licensee to be in compliance with the requirements of Option B and consistent with the guidance of RG 1.163 and the model TS of November 2, 1995, with the exceptions discussed below.

The licensee has proposed an exception to RG 1.163 which states that leakage measured from a main steam isolation valve (MSIV) is excluded from the combined leakage rate of 0.6 La. (This also represents an exception to NEI 94-01 inasmuch as treatment of MSIV leakage apart from La differs from the guidance in NEI 94-01). The staff finds this exception acceptable because it is consistent with an existing Appendix J exemption authorized by Unit 2 Operating License Paragraph 2.D.ii(b) that allows MSIV leakage to be treated separately from La in dose analyses for the design basis accident. In addition, the licensee proposed an exception to RG 1.163 that would permit not performing as-found testing of the MSIVs. The NRC staff finds this acceptable since the test interval of the MSIVs will not be performance based and the MSIV leakage is not included in La.

NEI 94-01 states that door seals must be tested prior to re-establishing containment integrity. The licensee proposes the following exception to this guidance:

Primary containment airlocks' door seals are tested prior to re-establishing containment integrity when something has been done that would bring into question the validity of the previous door seal test.

The staff notes that SR 4.6.1.3.a.2 requires that a seal test must be performed when an air lock has been used. The exception would permit not testing the air lock seals when the reactor had been in a condition where containment integrity had not been required but the air lock had not been opened. The staff finds this change to be acceptable.

Apart from TS changes proposed under Appendix J, the licensee also proposed to change the testing interval of the air lock interlock specified in SR 4.6.1.3.c from 6 months to an interval based upon air lock usage. Specifically; the change would require an airlock door interlock test prior to performing the air lock door seal test which is required after each air lock door usage. The licensee finds that the interlock test is more convenient when performed before the air lock door seal leakage test. To support this change, the licensee reviewed air lock interlock operating experience for approximately 10 years at Nine Mile Point, Unit 2 and

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Enclosure



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