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 CRANE, P. C. Pacific Gas & Electric Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 MIRAGLIA, F. J. Licensing Branch 3

SUBJECT: Forwards revision to proposed Tech Spec 4.6.1.3, replacing Type B leak test w/leak test applied between double seals used on air lock. Exemption from 10CFR50 App J Paragraph III, D.2(b)(ii) re leak test requested.

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PG&E +

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U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Docket No. 50-275
Docket No. 50-323
Diablo Canyon Units 1 and 2

Dear Mr. Miraglia:

Pacific Gas and Electric Company requests an exemption from the provisions of 10 CFR 50 Appendix J Paragraph III.D.2. (b) (ii) which require a Type B leak test following the opening of an air lock during periods when containment integrity is not required by plant Technical Specifications.

Instead, the Type B test should be replaced with a leak test applied between the double seals used on our air lock. This seal leak test and its acceptance requirements are described in the Diablo Canyon Technical Specifications at Section 4.6.1.3. This test will demonstrate the leak tightness of the air lock without requiring a time consuming Type B test of the entire air lock.

A Type B test of the air lock, following use during periods when containment integrity is not required is not justified unless maintenance has been performed which directly effects the air lock seals. In addition, a full Type B test is required at least every 6 months regardless of use.

Attached is a draft of page 3/4 6-6 to the Diablo Canyon Technical Specifications reflecting this proposed revision.

Very truly yours,

Richard F. Locke
for Philip A. Crane, Jr.

*Book
5/11*

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PDR ADDCK 05000275
A PDR

Attachment

CC: Service List

