



Commonwealth Edison

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January 18, 1989

Dr. T. E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Commonwealth Edison Company
Reporting Practices for
Local Leak Rate Testing
NRC Docket Nos. 50-237/249, 50-254/265,
50-295/304, 50-373/374, 50-454/455, 50-456/457

References (a): NUREG 1022 Supplement 1 (Section II Item 2.3)

(b): NUREG 1022 Supplement 1 (Section II Item 21.0)

Dear Dr. Murley:

This letter proposes an improvement in reporting practices with respect to local leak rate testing (LLRT). This was discussed with F. Maura and R. Mendez of Region III on December 19, 1988, who indicated that NRR input would be needed.

As you are aware, 10 CFR 50 Appendix J requires that licensees provide a leak rate testing report (which includes both local and integrated results) within approximately 3 months for outages in which integrated leak rate testing (ILRT) has been performed. In addition, as part of CECO's efforts to improve LLRT practices at all six of our nuclear stations, CECO plans to provide leak rate testing reports whenever LLRT during refueling outages exceed a cumulative value of $0.6L_A$ (maximum pathway) regardless of whether an ILRT was performed.

Since this will assure that the NRC staff is informed in a timely manner of all cases where LLRT's exceed $0.6L_A$, CECO does not believe that redundant reporting via Licensee Event Reports (LERs) is required or desirable. In addition, previous staff guidance on LERs in Reference (a) for similar surveillance testing has indicated that an LER is needed only if firm evidence

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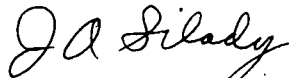
exists that the deficient condition occurred previously when the equipment was required to be operable and meet the surveillance criteria. In many cases firm evidence does not exist and LERs should not be required. The Reference (b) question specifically addresses potential redundancy of Appendix J and LER reporting but the answer is not definitive on "reportable situations."

With the use of the 3 month Appendix J report for all outage LLRT programs where $0.6L_A$ is exceeded, CECO believes that LERs should only be required if firm evidence exists that the condition occurred while containment integrity was required.

Your review of this interpretation and concurrence with discontinuance of unnecessary leak rate testing LERs is requested.

Please contact this office should further information be required.

Very truly yours,



J. A. Silady

Nuclear Licensing Administrator

cc: A.B. Davis - Regional Administrator, RIII
B.L. Siegel - Project Manager, NRR
S.G. DuPont - Resident Inspector, Dresden
F.A. Maura - Region III