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SUBJECT: Discusses containment integrated leak rate testing. Util may elect to conduct reduced duration intergrated leak rate testing to satisfy requirements of facilities Tech Specs for Type A leak rate testing.

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 TITLE: OR Submittal: Append J Containment Leak Rate Testing

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U. S. Nuclear Regulatory Commission
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Gentlemen:

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Containment Integrated Leak Rate Testing

The St. Lucie Unit 1 and Unit 2 Technical Specifications each require that containment leakage rates be demonstrated at specified intervals and that they be determined in conformance with the criteria specified in Appendix J of 10 CFR 50 using the methods and provisions of ANSI N45.4-1972. 10 CFR 50 additionally states "The method chosen for the initial test shall normally be used for the periodic tests". ANSI N45.4-1972 specifies the practices and test requirements for the quantitative determination of leakage rates for containment structures. The standard provides for one of two acceptable methods for leakage-rate testing: the Absolute Method and the Reference-Vessel Method. The choice of either method is left to the testing organization and those responsible for acceptance of the containment structure. The ANSI standard specifies that, for either method, the leakage-rate test period shall extend to 24 hours of retained internal pressure. However, the standard continues "If it can be demonstrated to the satisfaction of those responsible for the acceptance of the containment structure that the leakage rate can be accurately determined during a shorter test period, the agreed-upon shorter period may be used".

A reduced duration (i.e., less than 24 hours of retained pressure) Integrated Leak Rate Test (ILRT) is described in the Bechtel Topical Report, BN-TOP-1, Revision 1, "Testing Criteria for Integrated Leakage Rate Testing of Primary Containment Structures for Nuclear Power Plants." This topical report was found acceptable by the staff in a letter dated February 6, 1973 (R. C. DeYoung (AEC) to R. D. Allen (Bechtel)).

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Florida Power & Light Company (FPL) has conducted reduced duration ILRTs at its Turkey Point Units 3 and 4 using the methodology described in the Bechtel Topical Report. The summary technical reports of the Reactor Containment Building Integrated Leak Rate Test for the most recent ILRTs using the methodology described in Bechtel Topical Report BN-TOP-1, Revision 1, for Turkey Points Units 3 and 4 were submitted in FPL letters L-85-368, dated September 26, 1985 and L-86-262, dated June 29, 1986, respectively. These Type A tests were successfully completed using the Bechtel methodology. Both units achieved mass point and total time upper confidence limits well within acceptance criteria.

To date, FPL has conducted only 24 hour duration ILRTs at St. Lucie Units 1 and 2. However, FPL may elect to conduct reduced duration ILRTs to satisfy the requirements of the St. Lucie Units 1 and 2 Technical Specifications for Type A leak rate testing for the upcoming and future refueling outages.

If additional information is required on this topic, please contact us.

Very truly yours,



C. O. Woody
Group Vice President
Nuclear Energy

COW/EJW/gp

cc: Dr. J. Nelson Grace, Region II, USNRC
USNRC Resident Inspector, St. Lucie Plant

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The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice. This ensures transparency and allows for easy verification of the data.

In the second section, the author details the various methods used to collect and analyze the data. This includes both manual and automated processes. The goal is to ensure that the data is as accurate and reliable as possible.

The third part of the document focuses on the results of the analysis. It shows that there is a clear trend in the data, which is consistent with the expectations set at the beginning of the study.

Finally, the document concludes with a summary of the findings and some recommendations for future work. It suggests that further research is needed to explore the underlying causes of the observed trends.