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MAR 31 1977

Docket No. 50-247

MEMORANDUM FOR: K. R. Goller, Assistant Director for Operating Reactors, DOR

FROM: B. H. Grier, Director, Division of Reactor Inspection Programs, IE

SUBJECT: RESOLUTION OF TECHNICAL SPECIFICATION COMMITMENT RELATIVE TO APPENDIX J OF 10 CFR 50 AT INDIAN PT., UNIT NO. 2

The current technical specifications for Unit 2 are such as to require that the weld channel and penetration pressurization system is operable when the reactor is critical (See T-S, 3.3.D, page 3.3-4). Only portions of this system's pressurized volumes are to be Type B and C tested while the remaining volumes do not need to be tested. The capability exists to valve out the volumes which are not to be leak tested, but the technical specifications prevent it during operation.

The situation has now arisen where the leakage from total volume pressurized by the weld channel and penetration pressurization system along with other Type B and C leakage exceeds Appendix J requirements. This leaves the question of whether the licensee is in compliance with the regulation indeterminable. Without valving out the volumes that do not need to be leak tested, it is not possible to definitely establish the total Type B and C leakage.

The alternatives appear to be as follows.

1. Modify the technical specifications to allow the volumes not requiring tests to be valved out of the system while testing during reactor operation so that a definitive test can be conducted to verify $L_B + L_C \leq 0.5 L_A$.
2. Require shutdown to perform the tests in order to meet the current technical specifications regarding operability of the pressurization system.
3. Assume that total leakage of the containment is less than L_A (last Type A test was 7/76) and that the requirement that

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the summation of B and C leakages be less than 0.6 L_a of Appendix J does not apply.

We strongly recommend the concept of the first approach for the following reasons.

1. The licensee in response (9/9/75) to your letter of August 7, 1975 concerning containment leakage testing indicated that they would implement the same requirements on Unit 2 as were finally agreed on for Unit 3. At that time Unit 3 Technical Specifications were being developed and finalized.
2. The Unit 3 Technical Specifications, dated April 5, 1976, specifically allow one header of the pressurization system to be inoperable for up to 48 hours (See 3.3.D.2). This would, if implemented on Unit 2, allow the test to be performed and a determination made on whether the leakage is associated with isolation valves or some other component.

This item was brought to the attention of Headquarters by the region and we are of the opinion the matter should be resolved within 30 days from the date of this memorandum. We have enclosed a copy of the incoming correspondence along with the other relevant documents or extracts. We will be ready at your convenience to discuss this item and look forward to your response regarding action on the item.

B. H. Grier, Director
Division of Reactor Inspection Programs
Office of Inspection and Enforcement

Enclosures:

1. Extract from T-S for Unit 2
2. Ltr., Cahill, ConEd to Goller, NRC, dated 9/9/75
3. Extract from T-S for Unit 3
4. Memo, McCabe to Seyfried, dated 2/25/77

cc:w/Encls.:

D. G. Eisenhut, DOR
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