

DUKE POWER COMPANY

POWER BUILDING

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WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

TELEPHONE AREA 704
373-4083

September 5, 1975

Mr. Roger S. Boyd, Acting Director
Division of Reactor Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Mr. Boyd:

An August 4, 1975 letter from Mr. Karl R. Goller requested that we determine if containment leakage testing at the Oconee Nuclear Station is in full compliance with 10CFR50 Appendix J. The letter stated that it should be understood that while the present program may be in compliance with Technical Specifications, it may not be in conformance with Appendix J.

The Oconee Technical Specifications, approved by the Commission on February 6, 1973, October 6, 1973 and July 19, 1974, are in compliance with 10CFR50 Appendix J, as issued on March 6, 1973, with one exception. Oconee Technical Specification criteria for testing of containment air locks do not conform to our interpretation of the criteria of Section III.D.2 of Appendix J. Appendix J requires a Type B test of containment air locks at six-month intervals; however, those air locks which are opened during such intervals are also to be tested after each opening. Oconee Technical Specification 4.4.1.2.5 requires testing of the outer door seals at four-month intervals, except when the hatches are not opened during that interval, and in no case shall the test interval be longer than 12 months.

The Oconee personnel and emergency air lock leak rate tests are performed by pressurizing the air lock between the inner and outer doors. This test tends to seat the outer door and unseat the inner door. In order to complete the test, a restraint is placed on the air lock side of the inner door to physically restrain the door from lifting off its seat. After the test is completed, the air lock must be opened to remove the restraints, thereby negating the test since Appendix J requires an air lock test each time the air lock has been opened. This appears to be a generic problem with air locks.

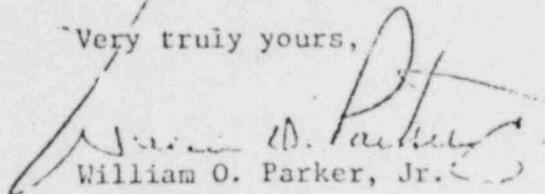
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Mr. Roger S. Boyd
Page 2
September 5, 1975

The air lock leak rate test requires several hours to perform since the entire air lock volume has to be pressurized to 59 psig and a leak rate established. Appendix J does not specify under what unit conditions the leak rate test is required. Thus, although entry to the Reactor Building is normally made several times a week, maintenance outages when the reactor is in a hot or cold shutdown condition require entry numerous times each day. Thus, the requirements of Appendix J are not practical.

In light of the design of the Oconee containment air locks, and the impracticality of the requirements of Appendix J, and the Commission's previous review of the acceptability of the Oconee Technical Specifications, it is requested that an exemption pursuant to 10CFR50, Section 50.12, be granted and testing be permitted to continue in accordance with the present Technical Specifications.

Very truly yours,



William O. Parker, Jr.

MST:vr