UNITED STATES NUCLEAR REGULATORY COMMISSION REGION III 799 ROOSEVELT ROAD GLEN ELLYN, ILLINOIS 60137

November 22, 1976

R. C. Knop, Chief, Reactor Projects Section 1

TOLEDO EDISON COMPANY (DAVIS-BESSE I) DOCKET NO. 50-346 TECHNICAL SPECIFICATIONS FOR LEAK TESTING OF EQUIPMENT HATCH

In reviewing the proposed Technical Specifications for the above unit, it was noted that the specifications do not address an acceptable testing method for the containment equipment hatch which utilizes double gaskets with provision for pressurizing between the gaskets.

For example, what constitutes an acceptable leak test of this hatch after reinstallation? The licensee removed the hatch after completion of their preoperational Type A test to support the continuation of construction activities. The Technical Specifications do not address the test pressure, duration, and leak rate criteria to be used. (Their FSAR, page 6-21, indicates they will test after each opening, but no acceptance criteria is stated.)

I recommend Headquarters be contacted, and that NRR be encouraged to include requirements in the Technical Specifications which would address:

- a. Maximum time after hatch reinstallation during which leak rate tests must be conducted.
- b. Test conditions under which leak rate testing will be done.
- c. Any possible generic applicability since a check of the Point Beach 1/2, Zion 1/2, Prarie Island 1/2, and D. C. Cook Technical Specifications showed that only the Point Beach specifications address the requirement to test after each opening.

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R. D. Martin Reactor Inspector

cc: G. Fiorelli



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CONTAINMENT EQUIPMENT HATCH TESTING DESCRIPTION OF CIRCUMSTANCES:

During a review of various plants it was noted that most Technical Specifications were mute wit. respect to testing of the Containment Equipment Hatch seals following each closure, to insure their leak tightness.

During the reclosure damage could occur to the seals thus causing a significant leakage path outside of containment. Such a leak could result in an unreviewed safety question. To preclude such a possible unreviewed safety question, it is I and E's position that the equipment hatches seals should be tested subsequent to each closure to determine that the requirements of Appendix J are being met.

For those reactors not having testable seals on the equipment hatch, a Class A test must be conducted subsequent to each closure. ACTION TO BE TAKEN BY LICENSEE:

 Determine and report to this office within 30 days the following information:

- a. Describe your current administrative controls relative to the testing of the equipment hatch seals subsequent to each hatch closure.
- b. Provide your acceptance criteria and test methods for verifying the integrity of the equipment hatch seals.