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MATERIAL RELATED TO CRGR MEETING NO. 199

CC (LIST ONLY) JEAN RATAJE, PDR L STREET

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FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
DENNIS ALLISON	
	Phone No.
	24148

5041-102

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MATERIAL RELATED TO CRGR MEETING NO. 199  
TO BE MADE PUBLICLY AVAILABLE

22-141 50 SHEETS  
22-142 100 SHEETS  
22-144 200 SHEETS  


1. MEMO FOR J. TAYLOR FROM E. JORDAN DATED \_\_\_\_\_  
SUBJECT: MINUTES OF CRGR MEETING NUMBER \_\_\_\_\_  
INCLUDING THE FOLLOWING ENCLOSURES WHICH WERE NOT  
PREVIOUSLY RELEASED:

- a. ENCLOSURE 2  
A SUMMARY OF DISCUSSIONS OF A PROPOSED Draft Final  
Amendment to 10 CFR 50, Appendix J on  
Containment Leakage Testing
- b. ENCLOSURE \_\_\_\_\_  
A SUMMARY OF DISCUSSIONS OF A PROPOSED \_\_\_\_\_
- c. ENCLOSURE \_\_\_\_\_  
A SUMMARY OF DISCUSSIONS OF A PROPOSED \_\_\_\_\_

2. MEMO FOR E. JORDAN FROM \_\_\_\_\_ DATED \_\_\_\_\_  
FORWARDING REVIEW MATERIALS ON A PROPOSED \_\_\_\_\_

3. MEMO FOR E. JORDAN FROM \_\_\_\_\_ DATED \_\_\_\_\_  
FORWARDING REVIEW MATERIALS ON A PROPOSED \_\_\_\_\_

4. MEMO FOR E. JORDAN FROM \_\_\_\_\_ DATED \_\_\_\_\_  
FORWARDING REVIEW MATERIALS ON A PROPOSED \_\_\_\_\_

x

March 8, 1991

MEMORANDUM FOR: James M. Taylor  
Executive Director for Operations

FROM: Edward L. Jordan, Chairman  
Committee to Review Generic Requirements

SUBJECT: MINUTES OF CRGR MEETING NUMBER 199

The Committee to Review Generic Requirements (CRGR) met on Tuesday, February 12, 1991 from 8:00 a.m. to 1:30 p.m. A list of attendees at the meeting is enclosed (Enclosure 1). The following items were discussed at the meeting:

1. The CRGR discussed a draft presentation outline for a Commission briefing on CRGR activities. The briefing was scheduled for February 22, 1991.
2. L. Shao and G. Arndt of RES continued a presentation (begun at Meeting No. 198) on a draft final amendment to 10 CFR 50, Appendix J on containment leakage testing. The CRGR recommended in favor of the amendment, subject to some revisions to be coordinated with the CRGR staff.
3. The CRGR briefly discussed planning and agenda matters. It was suggested that the next site visit be scheduled in June 1991.

Questions concerning these meeting minutes should be referred to Dennis Allison (492-4148).

Original Signed by:  
E. L. Jordan

Edward L. Jordan, Chairman  
Committee to Review Generic Requirements

Enclosures:  
As stated

cc: Commission (5)  
SECY  
J. Lieberman  
P. Norry  
D. Williams  
W. Parler  
Regional Administrators  
CRGR Members

Distribution:  
Central File w/o encl.  
PDR (NRC/CRGR) w/o encl.  
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J. Sniezek M. Taylor  
J. Heltemes S. Treby  
G. Arndt L. Shao  
D. Ross J. Conran  
D. Allison W. Minners  
A. Murphy J. Costello

CRGR 5/F

*JMA*  
CRGR:AEOD  
DAllison:slm  
03/6/91

*DR*  
DD:AEOD  
DRoss  
03/17/91

*EJ*  
C:CRGR:AEOD  
EJordan  
03/17/91

*9104020220*

ATTENDANCE LIST

CRGR Meeting No. 199

February 12, 1991

CRGR Members

E. Jordan  
G. Arlotto  
J. Moore  
F. Miraglia  
B. Sheron

CRGR Staff

J. Conran  
D. Allison

NRC Staff

L. Shao  
G. Arndt  
R. Bosnak  
J. Pulsipher  
J. Costello  
A. Murphy  
P. Kadambi  
F. Mora

Enclosure 2 to the Minutes of CRGR Meeting No. 199  
Draft Final Amendment to 10 CFR 50, Appendix J  
on Containment Leakage Testing

February 12, 1991

TOPIC

L. Shao and G. Arndt of RES continued a presentation on a draft final amendment to 10 CFR 50, Appendix J on containment leakage testing. A proposed amendment had been published for comment in 1986. After considerable work and discussion with industry, this draft final amendment was being proposed.

The CRGR had been previously briefed on the draft final amendment at Meeting No. 192 and had begun its review at Meeting No. 198.

BACKGROUND

The review package was as described in the minutes of Meeting No. 198.

CONCLUSIONS/RECOMMENDATIONS

The CRGR recommended in favor of the amendment, subject to several revisions to be coordinated with the CRGR staff.

The action was considered to be a backfit. In the backfit analysis the staff concluded that there would be a substantial safety enhancement from better, more uniform tests and test reports, greater confidence in the reliability of the test results, fewer exemption requests and interpretive debates, withdrawing NRC endorsement of a superseded national standard, greater flexibility, and a refocusing of corrective actions to where problems originate. This increase in safety would be achieved without any overall change in net costs to the industry.

Although the CRGR believed that there would be a safety benefit from the action, it did not agree that this amendment would provide "... a substantial increase in the overall protection of the public health and safety ..." as required by the backfit rule. Nevertheless, the CRGR considered the amendment very worthwhile and strongly recommended forwarding it to the Commission.

The CRGR believed that the staff's consideration of safety goals was adequate.

Some of the additional comments/revisions are summarized below:

1. The package should explain the basis for the increase in radiation dose (10,000 person-rem). It should note that testing practices have evolved since 1985 and the differential (or additional dose) should be less when compared to current practice than it was in 1985 when the dose estimates were made. Doses should be discussed in the backfit analysis summary section in page 18.
2. Where exceptions are discussed, a model similar to 10 CFR 50.55a (a) (3) should be used.

3. The visual examination requirement, which is in the current rule but not the proposed rule, should be added as recommended by the staff.
4. The conclusion of the backfit analysis, on page 28, should be revised.
5. The definitions and usage of terms such as "primary containment" should be made consistent with other sections of the rules as well as regulatory guides, etc.
6. It should be made more clear that the first LLRT is to be done at the first refueling outage and subsequent tests are to be performed at alternate outages.
7. Delete the last part of the last sentence of page 42.
8. Reconsider the maximum time between Type A tests. Thirty months may be appropriate rather than 26 months.
9. Reconsider use of terms such as "leakage," "leak rate," and "improve leakage."
10. Remove the condition "for which no identical ... plants" on page 52.
11. Remove the section on Multiple Leakage Barriers or Subatmospheric Containments on page 53.
12. Ensure reporting of failed LLRT's are covered under 10 CFR 50.73, and remove from Appendix J on page 55.
13. In their submittals, licensees should identify the exemptions to the current Appendix J which should remain in effect under the new Appendix J. The submittal requirement should call for a schedule rather than a plan.
14. In the regulatory guide.
  - (a) Remove "thereby reducing an unproductive ..." on page 3.
  - (b) Indicate "The staff always applies the single active failure criterion to the review of containment isolation systems in item 4 on page 4.
  - (c) Reconsider and revise as appropriate the statement in 6.1(12.1) on page 9.
  - (d) Reconsider and revise as appropriate the implementation section.

March 8, 1991

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FROM: Edward L. Jordan, Chairman  
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Edward L. Jordan, Chairman  
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CRGR S/F

*JMA*  
CRGR:AEOD  
DAllison:slm  
03/6/91

*ER*  
DD:AEOD  
DRoss  
03/1/91

*ELJ*  
C CRGR:AEOD  
EJordan  
03/7/91

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