



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

February 11, 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 198

The Committee to Review Generic Requirements (CRGR) met on Wednesday, January 23, 1991 from 1:00 p.m. to 5:00 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 is scheduled for February 22, 1991. Based on CRGR comments a modified version is being circulated to CRGR members for further comment.
2. L. Shao and G. Arndt of RES presented for CRGR review a draft final amendment to 10 CFR 50, Appendix J on containment leakage testing. It was agreed to continue these discussions at the next meeting. This matter is discussed in Enclosure 2.
3. D. Ross of AEOD provided a briefing on recent staff activities related to implementation of the safety goals. This included formation of a steering group on the updating of regulatory analyses. A short term goal of this group would be to produce guidelines on implementation of the safety goals within about 2 months. It was suggested that the group's chairman (Heltemes) or one of the members (Ross) provide periodic status updates to the CRGR.
4. The CRGR discussed the nominal schedule for its regular meetings. For some time, meetings had been scheduled for the afternoon of the second and fourth Wednesday of each month. It was decided to change this nominal time to the morning of the second and fourth Tuesday of each month, beginning February 12, 1991 in order to reduce the impact of CRGR meetings on CRGR members' routine travel.
5. The CRGR briefly discussed planning and agenda matters. It was agreed that the next meeting would be scheduled for 8:00 a.m. - 12 Noon on Tuesday, February 12, 1991, provided no schedule conflicts arise. The following meeting would tentatively be scheduled for Thursday, February 21, 1991.
6. The CRGR initiated planning for the next plant visit.

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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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P. Kadambi M. Taylor
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J. Heltemes L. Shao
G. Arndt J. Conran
D. Ross E. Jordan
D. Allison W. Minners

DNA
CRGR:AEOD
DAllison:slm
1/29/91

DD
DD:AEOD
DRoss
7/91

ELJ
C:CRGR/AEOD
EJordan
2/7/91

ATTENDANCE LIST

CRGR Meeting No. 198

January 23, 1991

CRGR Members

E. Jordan
G. Arlotto
J. Moore
F. Miraglia
S. Collins (for L. J. Calian)
J. Murphy (for B. Sheron)

CRGR Staff

J. Conran
D. Allison
D. Ross

NRC Staff

M. Taylor
L. Shao
G. Arndt
R. Bosnak
E. Jakel
J. Pulsipher
J. Costello
A. Murphy
G. Mizuno
P. Kadambi

Enclosure 2 to the Minutes of CRGR Meeting No. 198
Draft Final Amendment to 10 CFR 50, Appendix J
on Containment Leakage Testing

January 23, 1991

TOPIC

L. Shao and G. Arndt of RES presented for CRGR review 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.

A copy of the slides used in the presentation is provided as an attachment to this enclosure.

BACKGROUND

The review package was forwarded by a memorandum dated January 8, 1991 for E. Jordan from E. Beckjord. The package included a federal register notice (statement of considerations and final rule) along with 21 other supporting documents.

CONCLUSIONS/RECOMMENDATIONS

Since the review was not completed, no conclusions or recommendations resulted from this meeting. It was agreed to continue the review at the next meeting. At that time the CRGR expected to go through the package in detail.

Some of the principal comments and observations are summarized below. In this regard, it was not considered appropriate for the staff to redraft and resubmit the package because the CRGR was still conducting its review.

1. Backfitting

In the draft 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.

Considerable discussion was devoted whether or not such a safety enhancement would be substantial within the meaning of the backfit rule (10 CFR 50.109). The CRGR had some difficulty with such a conclusion. However, the changes seemed to be quite worthwhile and the CRGR was generally supportive of the amendment.

2. Safety Goals

It was agreed that the staff would consult with J. Murphy of RES on the wording of the safety goal assessment.

3. Industry Support

Remarks to the effect that industry now favored the amendment were not supported by the formal comments (from 1986) on the proposed amendment.

4. Visual Examination

No objections were noted to including visual examination requirements in the rule, as proposed by the staff.

5. NRC Acceptance of Licensee Proposals

At several places the amendment uses language such as (1) "unless an alternative leakage rate test is acceptable to the NRC staff on some other defined basis" or (2) a schedule "must be submitted to the NRC staff for

review and approval." This wording appeared to need clarification and better definition in terms of who is responsible for the approval (probably the Director of NRR) and whether or not these items were to be considered as exemptions from the NRC's rules or exceptions allowed within this rule. It was agreed that RES, OGC and NRR would coordinate on determining the proper handling for these items.

10 CFR 50, APPENDIX J + RG MS 021-5

CRGR MEETING 1/23/91

OBJECTIVE

Get Appendix J and reg. guide MS 021-5 issued as final documents.

DESCRIPTION

1. Inform members about 1/17/91 planning session + assumption that they know enough about what Appendix J is to: identify major changes being made to existing rule, holding in-depth discussions to later.
2. Discuss acceptability of the Backfit Analysis for this rule.
3. Discuss the acceptability of the Safety Goals Assessment for this rule.
4. Restore "visual examination" requirement to rule.
5. Status of BWRDG LTR.
6. Describe contents of package as submitted to CRGR.

CONCLUSION

CRGR recommend that the EDO forward this rule, and its regulatory guide, to the Commission for publication as final documents.

*ATTACHMENT
TO ENCLOSURE 2*

October 1990

MAJOR CHANGES BETWEEN 1973 RULE AND CURRENT FINAL RULE
[Roughly in my own subjective order of significance]

1. Shift in emphasis from ILRT to LLRTs.

The new rule will permit corrective action - or more intensive LLRTs - in lieu of automatically conducting "penalty" ILRTs at successive refueling outages if the cause and nature of the failure of 2 successive ILRTs has been identified, justified, and accepted.

2. Elimination of reduced pressure ILRT option, with 4% variation permitted on full test pressure (not > maximum containment design pressure).
3. Replacement of minimum 24-hour Type A test duration with 8-hour minimum.
4. Type A test frequency uncoupled from 10-year ASME Section XI inservice inspection interval and decreased, with additional extensions available to accommodate longer periods between refueling outage (from 18 to 24 months).
5. Greater flexibility throughout rule with less prescriptive requirements, hopefully avoiding early obsolescence as testing technology evolves.
6. Standard to be followed for test procedures not specified (reference to ANS standard dropped), but licensees are required to document and commit to a referenced standard to be approved by the NPC staff.
7. Companion regulatory guide endorsing use of ANSI/ANS 56.8 as source of prescriptive aspects of conducting the test and analyzing the test data.
8. Raising acceptance criterion for As-Found ILRTs from 0.75 L₁ to 1.0 L₁.
9. Evolution from a point check every 3-1/2 years toward a more continuous determination of containment pre- and post-accident functional integrity.
10. Encouraging licensees to prepare and use a specific, documented leakage test program. (refs: CR-MEMO.DOC, page 11, & App. J, VII.A.)
11. Standardized ILRT report format and content level.

October 1990

MAJOR CHANGES BETWEEN PROPOSED & FINAL RULE
(In order as encountered in rule)

1. "Containment isolation valve" definition revised with an explicit definition for older plants.
2. "Continuous monitoring system" defined.
3. "Minimum pathway leakage" definition revised to include an alternative.
4. "Type B test" definition made more specific.
5. Type A, B, and C test interval extensions provided for greater flexibility and to accommodate 24-month instead of 18-month refueling cycles.
6. Test duration not dropped, but reduced from a minimum of 24 hours to 8 hours for Type A periodic (not preoperational) test, and 4 hours for verification test.
7. B & C test results added to A test results during a Type A test outage to clarify "as found" and "as left" requirements.
8. Air lock testing made more flexible with the clarifications added.
9. Conditions stipulated for exempting penetrations and valves from Type B and C tests.
10. Direction of testing of valves put back in.

APPENDIX J DATES

CRGR briefing on draft rule & reg. guide	04/17/85
" " " " " " " "	05/29/85
CRGR review of " " " " "	06/03/85
" " " " " " " "	07/08/85
CRGR approval memo	08/20/85
ACRS Subcommittee on Regulatory Activities	06/04/85
ACRS Full Committee	06/08/85
ACRS Approval memo	07/11/85
 <u>SECY-86-197</u>	
To EDO	10/30/85
Accepted by D/EDO	11/04/85
Recalled to include newly-required Backfit Analysis	11/ /85
Development of an acceptable Backfit Analysis	12/10/85 - 05/27/86
To Commission	05/29/86
 <u>Ballots</u>	
Commissioner Zech For Issue	07/25/86
Commissioner Roberts Conditions on Issue	08/07/86
Commissioner Bernthal For Issue	08/27/86
Commissioner Asselstine For Issue	09/27/86
SECY memo approving publication For Comment	09/18/86
* Published in FR: Rule	10/29/86 *
Reg Guide	10/28/86 *
Comment period extended from 1/26/87 to 4/24/87	01/22/87
 <u>"Mass Point" Rule Change</u>	
CRGR recommended to replace NRR generic letter with rule change	04/17/87
Draft rule in Federal Register	02/29/88
Final rule in Federal Register, effective immediately	11/15/88

APPENDIX J DATES (Continued)

BWRDG

G. Arndt appointed NRC technical contact w/ BWRDG
Containment Testing Committee. 06/22/88

Committee/NRC meetings 08/24/88
01/26/89
08/04/89
02/08/90

Submitted to NRC: draft Licensing Topical Report (LTR),
"Standardized Program for Primary Containment
Integrity Testing", NEDO-31722, August 1989 08/21/89

NRC/BWRDG Management meetings 04/09/90
08/02/90

Letter to BWRDG Contain. Testing Comm. w/ review of
BWRDG LTR contents as comments on App. J revision. 09/20/90

Resumption of Appendix J & guide

Completed resolution of comments on proposed rule & guide; 10/23/89
Prepared final rulemaking package;
Reviewed package against BWRDG 1989/90 comments;
CRGR package to Regions & user offices for concurrences.

Concurrences received w/ numerous comments 11/01/89 - 03/21/90
requiring changes to FR Notice & rule.

Final rule & guide to CRGR 09/26/90

CRGR briefing 10/10/90
meeting 01/23/91

ROUTING AND TRANSMITTAL SLIP

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BCS P1 37

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Comment	Investigate	Signature
Coordination	Justify	

REMARKS

This previous Central File material can now be made publicly available.

MATERIAL RELATED TO CAGR MEETING NO. 198

CC (LIST ONLY) JEAN RATAJE, PDR L STREET

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

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MATERIAL RELATED TO CRGR MEETING NO. 198
TO BE MADE PUBLICLY AVAILABLE

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 F. Beckford DATED 1-8-91
FORWARDING REVIEW MATERIALS ON A PROPOSED (1) Final Rule
10 CFR 50, appendix J General Leakage Rate Testing of
Containments of Light-Water-Cooled Nuclear Power Plants
and (2) Final Guide (MSO21-5) Containment System Leakage
Testing

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

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

