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Docket No. 50-578

401-11

MEMORANDUM FOR: Carl J. Papicello, Director  
Division of Reactor Safety  
Region III

FROM: Robert M. Farnen, Director  
Division of PWR Licensing  
Office of Nuclear Reactor Regulation

SUBJECT: PROJECT FOR TECHNICAL ASSISTANCE & REVIEW OF APPROXIMATE  
TYPE-A TEST AT LA SALLE UNIT 1 - TIA FF-418

In your letter dated August 5, 1986, you requested NRR to document whether the gate valves for the feedline and Reactor Core Isolation Cooling turbine exhaust line should be left open for the Type-A Containment Integrated Leak Rate Test at La Salle. We have completed our review and have concluded the valves should be left open. The basis for this conclusion is discussed in the enclosed Safety Evaluation.

We trust that the information provided is responsive to your concerns, and the NRR responsibilities under TIA FF-418 have been completed.

*Robert M. Farnen*  
Director

Robert M. Farnen, Director  
Division of PWR Licensing  
Office of Nuclear Reactor Regulation

Enclosure  
As stated

RMF/PM  
M. Durnig:lh  
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T. Johnson  
27, VRE

RMF/PM  
Houston  
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20545

EVALUATION OF VALVE LINEUP FOR TYPE-A LEAK TEST

LA SALLE COUNTY STATION, UNIT 1

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-373

REFERENCE: MEMORANDUM FROM CARL J. PAPERELLO OF REGION III TO GARY HOLAHAN OF NRC, "REQUEST FOR ASSISTANCE-REVIEW LASALLE 1 TYPE-A TEST VALVE LINEUP", AUGUST 5, 1986.

1.0 INTRODUCTION

It was requested that NRC provide Region III with an evaluation of the licensee's position regarding valve lineup for the Type-A Containment Integrated Leak Rate Test (CILRT) at the La Salle Station. The valves in question are 1A2B21F065A,B on feedline and 1E51-F06R on the Reactor Core Isolation Cooling (RCIC) turbine exhaust line.

2.0 EVALUATION

The valves in question are remote manual motor-operated gate valves and they are normally open in the operating mode. The regulations (10 CFR Part 50, Appendix J) require the containment to be leak tested as close to the "as is" condition as practical. For sometime now, it has been the staff's interpretation that "as is" means that the valve position for CILRT should be consistent with the one in a normal operating mode when those valves are remote manual motor-operated.

The feedwater lines (there are two lines altogether) penetrate the drywell to connect with the reactor pressure vessel. There are three isolation valves per line. The isolation valve inside the drywell is a check valve. Outside the primary containment, there is another check valve. Farther away from the containment is a remote manual motor-operated gate valve 1A2B21F065A,B. Should a break occur in the feedwater line, the check valves would prevent a significant loss of reactor coolant inventory, and would provide prompt primary containment isolation. During the postulated loss-of-coolant accident, it is desirable to maintain reactor makeup water from all sources of supply. For this reason, the outermost gate valve does not automatically isolate upon a signal from the protection system. Therefore, the gate valves should be left open for CILRT.

As noted previously, two check valves offer immediate isolation should a break occur in the feedwater line. Subsequently, the gate valve is to be remote manually closed from the main control room to provide long-term leakage protection. For other accidents, the gate valve can be closed once the operator determines that feedwater makeup is unavailable or unnecessary, thus providing long-term leak tightness as stated in the Final Safety Analysis Report (FSAR).

The gate valve 1E51F068 is on the RCIC turbine exhaust line approximately three feet outside of the containment. The turbine is steam driven and exhaust steam enters the suppression pool. As in the case of the feedline, there is a check valve upstream in relation to the gate valve, and it is used for an immediate isolation of the containment in case of a break in the line. The gate valve is motor-operate, and remote manually actuated. It is normally open during plant operation. The FSAR states that "the gate valve in the RCIC turbine exhaust is designed to be locked open from the control room, and interlocked to preclude opening of the inlet steam valve to the turbine while the turbine exhaust valve is not in full open position". Table 6.2-21 of the FSAR also calls for an open gate valve position for a post accident as well as plant normal operation. Therefore, the gate valve, in question, should be left open for the CILRT.

### 3.0 CONCLUSION

Based on the design, functions, and intended operation, we conclude that the gate valves in question should be left open for the duration of the CILRT. It should be noted that the majority of licensees have conducted their CILRT in the past with these valves in the open position. Therefore, leaving these valves open, La Salle would be consistent with past industry practice in this regard.

Mr. Donnie H. Grimsley, Director  
Division of Rules and Records  
Office of Administration  
United States N. R. C.  
Washington, D.C. 20555

FREEDOM OF INFORMATION  
ACT REQUEST

FOIA-90-408  
Rec'd 9-12-90

Dear Mr. Grimsley:

On July 16, 1984, the Zion Nuclear Power Plant was closed for repair and retesting pursuant to citizens' complaint that nuclear containment leak rate tests done by the utility companies were often fraudulent and/or deficient, and that the NRC was covering-up bad testing.

Several related FOIA requests resulted in making public a certain number of documents related to fraudulent and/or deficient testing. These documents clearly indicated that many other documents crucial to public safety had not yet been made available to the public.

Your Agency failed to make these documents public, and asserted in the letter to the U.S. Congress of May, 1986, that because of the lawsuit pending with the Federal Court, matters related to fraudulent/deficient testing should be decided in frames of a lawsuit\*.

I am Plaintiff in the lawsuit, and I requested, in discovery, some of these documents relevant to the lawsuit. On December 10, 1986, the Court ordered the Defendant to produce these documents. However, Your Agency (the Defendant), based on a perjurous sworn statement, refused to produce them or let Plaintiff to examine them.

I request hereby that in accordance with the Freedom of Information Act, as amended, and with Part 9 of 10 CFR, documents described in the enclosure be made public immediately, and copy of documents be made available in the Public Document Room in 10 working days.

A fee, if necessary, will be paid by the Requester.  
The disclosure of documents will be greatly beneficial to the public.  
No commercial use is involved in disclosure.

Sincerely,

*Z. Reytblatt*

Z. REYTBLETT  
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Tel.: (312) - 567-5343  
(312) - 567-3162

Enclosure:

*Description of Requested Documents*

\* In fact, the Agency made several contradictory statements reversing itself.

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## DESCRIPTION OF REQUESTED DOCUMENTS

1. The following documents are missing from your previous FOIA responses to FOIA Petitions related to fraudulent/deficient leak rate testing of Zion and LaSalle Plants in 1982-84. Please, be aware of a Court order barring from the destruction of these documents. If any of them have been destroyed or damaged, indicate the time of the action and the name(s) of the person(s) responsible.

Data from the LaSalle test of 1982;

Computer program used at the Zion tests of 1983 and 1984\*;

Correspondence between the NRC HQ and Region III (some of it has been made public, and some is still missing) regarding the above tests;

Correspondence between the Region III and Commonwealth Edison Co. regarding same tests (most of it is missing from your responses);

Reviews, calculations, correspondence related to Director's Decision on LaSalle-Zion citizens' emergency relief petitions of 1983, and, particularly, on Reytblatt's work<sup>1</sup>.

2. The following documents have never been requested before.

Correspondence between the Region III and Commonwealth Edison Co. regarding Reytblatt's work, including reviews done for ComEd and shared with the Region III (Messrs. Maura, Reyes, and others).

Materials related to the zero-pressure test of July, 1984, at Zion (Region III - F. Maura, Reyes; H. Denton, T. Rehm, E. Arndt, R. Bernero, Huang, Shapaker);

Missing pieces of correspondence between E. Arndt and the Oak Ridge Nat. Laboratory (1982-1985; documents available at the PDR of ORNL indicate existence of requested materials);

Correspondence between NRC and the American Nuclear Society concerning Reytblatt's work (E. Arndt, Region III, Bernero, etc.).

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\* These documents were in the possession of Region III.

<sup>1</sup> these documents are referred in the Director's Decision and are missing; they have been in the custody of Messrs. H. Denton, T. Novak, R. Bernero, T. Rehm, E. Arndt, and Region III employees Messrs. Maura and Reyes.