



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V
1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

AC 93-1

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APR 19 1990

MEMORANDUM FOR: James E. Richardson, Director
Division of Engineering Technology
Office of Nuclear Reactor Regulation

FROM: R. P. Zimmerman, Director
Division of Reactor Safety and Projects
Region V

SUBJECT: REQUEST FROM RES FOR INFORMATION RELATED TO ADOPTION OF SUBSECTION
IWE, SECTION XI OF THE ASME CODE

The purpose of this memorandum is to respond to your memorandum dated December 21, 1989, same subject. Initial information was provided verbally to Wallace E. Norris on January 4, 1990, and Region V agreed to perform a survey of Region V licensees to identify any current containment inspection activities. The following is a summary of the information gathered on past and current licensee inspection activities in this area, and is provided in reply to the six areas of RES information requested in your memorandum.

1. "The adequacy of the guidance given in Appendix J concerning containment inspection."
 - o The present Appendix J to 10 CFR Part 50 provides specific acceptance criteria for Local Leak Rate Tests (LLRT) and Containment Integrated Leak Rate Tests (CILRT). However, the present Appendix J does not provide any specific information or guidance on how to conduct these types of tests. Since these items are left to interpretation, this can lead to a lack of uniformity in the way testing is performed from plant to plant. The proposed revision to Appendix J should provide clarification in this area, once it is issued.
 - o The present Appendix J does not provide acceptance criteria or guidance for any other form of containment inspection and, as a result, there is usually a lack of guidance and uniformity in how these inspections are performed from one plant to another.
2. "The availability of plant specific written procedures on the conduct of containment inspections."
 - o There are detailed plant procedures for LLRT and CILRT containment inspections.
 - o Normally the Appendix J visual containment inspection instructions are a one paragraph prerequisite in the CILRT Procedure, performed approximately every three years.

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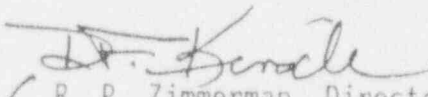
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- ° The only other containment steel liner inspections performed are those performed during painting of the containment steel liners. There normally are no formal procedures covering these inspections.
3. "The capability, knowledge, and training of utility personnel performing these inspection."
- ° The capability, knowledge, and training of licensee personnel performing LLRT and CILRT containment inspections appears to be adequate. In the past the CILRT inspections performed in Region V have been supported by outside contractors, who have had extensive experience in these areas.
 - ° As for training for visual and other forms of containment inspections, training has been less uniform, and, in some cases, nonexistent. Normally, available engineers, inspectors, and other test personnel have been used to perform the containment liner visual inspections.
4. "The availability of records of each inspection."
- ° The results of previous containment or component leak rate tests are quite detailed and readily available.
 - ° The results of visual and other forms of containment inspections are normally nonexistent, unless a questionable inspection result was documented for additional evaluation and/or corrective action.
5. "Utility follow-up on inspection data (i.e., trending of information to determine when action is needed)."
- ° There is no formal documentation of follow-up on normal inspection data, normally nonexistent, unless a problem was documented during an inspection.
6. "The availability of written criteria (and their bases) to determine when inspection results require action."
- ° Normally, the licensee uses Appendix J, available technical specifications, design drawings, etc., to evaluate and determine when inspection results require action.

Based on the information provided, it is apparent that additional comprehensive guidance is needed in the areas described above. If any additional Region V information is required in these areas, please contact Clifford Clark (FTS 463-3741).


R. P. Zimmerman, Director
Division of Reactor Safety
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cc:

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