Tecnessie Valley Authority, Post Office Box 2000; Decatur, Alabama 36609

December 20; 1991

O. J. *Ike* Zeringue
Vice President. Browns Ferry Operations.

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555

Gentlemen:

in the Matter of Tennessee Valley Authority

Docket No. 50-260

BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 2 - REQUEST FOR 10 CFR 50, APPENDIX J SCHEDULAR EXEMPTION

In accordance with 10 CFR 50.12, TVA requests a one-time exemption from the schedular requirements of 10 CFR 50 Appendix J, Sections II.D.2(a) and III.D.3. Section II.D.2(a) and Section III.D.3 require Type B tests, except tests for air locks, and Type C tests to be performed at intervals no greater than two years during reactor shutdown for refueling. We are requesting a one-time exemption to allow the performance of LLRT testing during the Cycle 6 refueling outage schedule to begin January 29, 1993. This exemption request has been reviewed by the Plant Operations Review Committee and the Nuclear Steam Supply System Vendor.

During the Cycle 5 outage, LLRT testing was accomplished as the associated systems were being returned to service. Subsequent delays in the restart of Unit 2 resulted in a number of these tests being performed significantly in advance of the May 24, 1991 restart of Unit 2. Therefore, the expiration of the test interval for some Type B and Type C tests will necessitate a plant shutdown of as much as 30 days for testing prior to the Cycle 6 refueling outage. While the earliest expiration of the test interval is July 1992, load supply planning considerations may require Unit 2 to shutdown sooner for LLRT testing. Approval of this one time exemption is requested to permit the realignment of the LLRT program with the BFN refueling outage schedule. Approval of this request will also benefit the BFN ALARA program by eliminating the additional personnel exposure which would accrue during the performance of these tests prior to the Cycle 6 refueling outage.

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U.S. Nuclear Regulatory Commission

December 20, 1991

BFN has and will continue to make every effort to satisfy the Appendix J test requirements during the current test interval. During two recent forced outages local leak rate tests were performed on 30 components for which the test interval would have expired prior to the Cycle 6 refueling outage. Additional LLRT testing will be performed during any forced outage of sufficient duration should one occur prior to the Cycle 6 refueling outage.

BFN's exemption request is contained on Enclosure 1. Enclosure 2 summarizes the commitment made in this letter.

If you have any questions, please contact Raul R. Baron at (205) 729-7566.

Sincerely,

O. J. Zeringue

Enclosure cc (Enclosure):

> NRC Resident Inspector Browns Ferry Nuclear Plant Route 12, Box 637 Athens, Alabama 35611

Mr. Thierry M. Ross, Project Manager U.S. Nuclear Regulatory Commission One White Flint, North 11555 Rockville Pike Rockville, Maryland 20852

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ENCLOSURE 1 REQUEST FOR A SCHEDULAR EXEMPTION FROM 10 CFR 50, APPENDIX J BROWNS FERRY NUCLEAR PLANT UNIT 2

INTRODUCTION

In accordance with 10 CFR 50.12, TVA is requesting a one-time exemption from the test interval requirements of 10 CFR 50, Appendix J, Sections III.D.2.(a) and III.D.3 for Browns Ferry Nuclear Plant Unit 2. Section III.D.2.(a) and Section III.D.3 require Type B tests, excepages sis for airlocks, and Type C tests to be performed at intervals no greater than two years during reactor shutdown for refueling. Browns Ferry Unit 2 was in cold shutdown from September 1984 until startup on May 24, 1991. As-Left local leak rate test (LLRT) performance began July 30, 1990 in preparation for Unit 2 startup. Due to a longer than expected return to power sequence, the as-left LLRT program extended into May 1991. Since the next refueling outage for Unit 2 is not scheduled to begin until early 1993, the expiration of the time interval for some Type B and Type C tests would force the plant to shutdown in July 1992 to perform Appendix J testing. TVA rescheduled the next planned outage from mid-March 1992 to January 29, 1993. This schedule avoids extension of components that have demonstrated poor leak performance in the past. Type B and C tests were performed during two recent forced outages to . duce the number of components that would require an interval extension. TVA plans to continue to perform Type B and C testing during unplanned outages as conditions permit.

The components affected by this request are listed in Table 1. These components represent approximately 44% of the LLRT program. Most of the components affected are Type B tests or Type C tests on closed loop seismic class 1 and water sealed isolation valves that either account for an extremely small percentage of total Type B and C leakage or are not included in the Type B and C leakage total. The remainder of the components are air tested isolation valves.

The tests listed in Table 1 will be reperformed during the next refueling outage. This outage is scheduled to begin less than six months after the time interval for the first LLRT performed expires. This relatively small increase in test interval (25% which is permissible for other types of surveillances) does not significantly increase the risk to the public health and safety based on the expected performance of the subject components. An analysis of past component performance indicates the incremental increase in leakage due to the extension is not a significant contributor to the total Type B and C leakage limit. The components included in this request that have experienced significant degradation over the past operating cycle have been repaired at replaced. The cost of doubling radiation exposure to plant test personnel when compared to the minimal gain in assurance that the affected components have not significantly degraded is unnecessary based upon the present test results and anticipated incremental increases in component leak rates. The requested exemption would reduce both personnel radiological exposure and resources expended to comply with the regulation without undue risk to the public health and safety.

If Unit 2 is required to shutdown and de-inert primary containment to perform local leak rate tests, a minimum of thirty days may be needed to perform various surveillance instructions. A heatup and cooldown cycle would be added increasing the probability of events more likely to occur during such evolutions. The length of a testing outage is heavily dependent on the rate of decay heat removal, since shutdown cooling must be removed from service to be tested. Eliminating a shutdown to perform testing mid-cycle and continuing operation until the next scheduled outage would result in a savings of approximately \$8 million.

DESCRIPTION

The first Cycle 5 as-left LLRT on Unit 2 was performed July 30, 1990; therefore, the maximum extension of the two year interval is 182 days. Prior to two forced outage that began October 18 and December 9, 1991, local leak rate tests on 158 components performed between July 30, 1990 and January 29, 1991 required time interval extension. However, during these two outages which resulted in Unit 2 being shutdown for approximately 5 days, 30 components were tested reducing the number of components requiring extension to 121. The listing below provides a breakdown of the number and types of components included in the requested extension. Components tested after January 29, 1991 are not affected by this request.

Air Tested Components (Subject to 0.6La Leakage Limit)

Expansion Bellows	28
Electrical Penetrations	15
Bonnet/Packing	5
Isolation Valves	0.5
Flanges	7

Water Sealed Components (Subject to 28.65 CFH Technical Specification Limit)

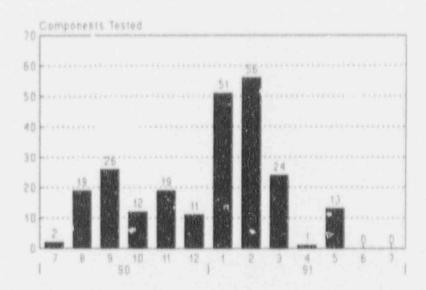
Isolation Valves 5

Closed Loop Seismic Class I Components

Isolation Valves 26

The following chart shows the distribution of LLRT performance for Unit 2, Cycle 6 restart. The maximum required extension for each component is tabulated in Table 1.

LLRT Performance



TECHNICAL BASIS

The two year interval specified in Appendix J is intended to be frequent enough to prevent significant degradation from occurring and long enough to permit LLRTs to be performed during refueling outages. At the time Appendix J was published (February 14, 1973) all light water reactors were on a nominal annual refueling cycle with relatively short refueling outages. Today most light water reactors are on an 18-month or two-year refueling cycle with extended refueling outages. The intent of the regulation is for isolation valves to be tested during refueling outages, not to require the unit to be shutdown solely for local leak rate testing.

Performing local leak rate tests during refueling outages lowers radiation exposure to plant personnel and is consistent with the purpose of 10 CFR Part 20. During the October 18, 1991 forced outage, conditions inside containment reduced the speed at which tests could be performed and involved significant heat stress and radiological hazards not normally present during refueling outages. A shutdown solely to perform leak tests is not consistent with the intent of either Appendix J or 10 CFR Part 20 and would result in at least doubling the radiological exposure and the risks associated with the affected tests. Since the tests will be reperformed during the next refueling outage, the cost to personnel in terms of radiological exposure and personnel safety is greater than the minimal increase in assurance that the components will not significantly degrade during the remainder of the Unit 2, Cycle 6 operating cycle.

During the extended outage, the Browns Ferry Appendix J program was reviewed and audited on several occasions. Various components were identified that were not being tested in accordance with Appendix J. Prior to restart, numerous actions were taken to upgrade the Appendix J program. The following is a summary of actions taken to upgrade the program:

- Block valves, test connections, and vent valves to enable isolation valves to be tested in the accident direction were added.
- Block valves and test connections to facilitate testing of bonnet and packing seals were added.
- Valves were reoriented to allow packing and bonnet seale to be tested during the normal Type C test.
- · Lines no longer used were capped to remove potential leak path.
- · Changes in valve type were made to improve leakage characteristics.
- Stainless stee) overlays were added to ventilation valves to improve leakage characteristics.
- Various repairs, replacements, and modifications of historical problem valves to improve leakage performance were conducted during the cycle 5 outage.

As a result of these upgrades, modifications, and improved maintenance practices, the possibility of significant degradation of containment components is reduced.

The projected incremental increase in the total Type B and Type C seak rate due to the extension is estimated in Table 2 utilizing historical local leak rate data from Unit 2, Cycles 4 and 5. Based on the past performance of the affected components, there is reasonable assurance that no significant degradation would occur during the extension interval. The condition of the components is, therefore, not expected to charge significantly over the extension period of approximately 25-percent of the two-year interval specified in Appendix J. Furthermore, the two-year interval specified for Type B and Type C tests was based on two years of exposure to service conditions. For the months prior to startup, these components were not exposed to service conditions. This should further reduce any potential degradation of these components.

Many of the components associated with this extension request cannot be tested at power due to their intended function and location. The specific reason why testing at power is impracticable is provided for each component in the notes to Table 1. BFN has and will continue to make every effort to satisfy the Appendix J requirements during the current test interval. Additional LLRT testing will be performed during any forced outage of sufficient duration should one occur prior to the Cycle 6 refueling outage. The current prioritization for forced outage leak rate testing is provided in Table 5.

Air Tested Components

Included in the extension request are the following types of air tested components flanges, expansion bellows, electrical penetrations, bonnets and packing, and isolatical valves. Flanges, expansion bellows, electrical penetrations, and bonnets and backing leakage account for only a very small fraction of Type B and C leakage. Based on historical data for these components, leak rates did not increase significantly over the last operating cycle. These results provide assurance that any incremental increase in leakage occurring during the extension period would not result in unacceptable component leakage rates. Isolation valves included in the extension have generally met the reference leak rates assigned based on valve size. Reference leak rates are administratively assigned to each component to help maintain leakage below associated allowable limits. A comparison of measured leakage to the reference leak rate for the particular component aides in determining if repairs are necessary and provides a means for identifying potential problem valves. Efforts are made to maintain leak rates below the reference values to ensure significant degradation of containment components does not occur. Of the 35 air tested isolation valves included in this extension request, 10 valves failed to meet assigned reference leak rates when cycle 5 as-found tests were performed. These components were repaired (2-69-579, 2-HCV-73-23, 2-73-603, 2-FCV-71-2, 2-FCV-71-3), modified (2-3-554), or replaced with a different type of valve (2-68-508, 2-68-550, 2-68-555, 2-FCV-73-45). Subsequent leak tests on these components were acceptable and well within established reference leak rates. The current total Type B and C leakage is less than 17% of the 0.6 La limit (655.9 scfh).

Water Sealed Isolation Valves

Four of the five water sealed isolation valves included in this extension have not experienced any significant degradation in the past and account for only a small fraction of the Technical Specification allowable limit of 28.65 cfh. There is no contribution to total Type B and C leakage due to these components. These results provide assurant that any incremental increase in leakage due to the extension would not result in any significant leakage through any valve. The remaining water sealed isolation valve was added to the Appendix J program this out ige. The current total water sealed leakage is less than 1.5% of the Technical Specification limit.

Closed Loop Seismic Class 1 'solation Valves

Closed Loop Seismic Class I components of the Residual Heat Removal System and Core Spray System are water filled post-accident and are required to be tested, but are not included in the 0.6La leakage limit. There is no contribution to total Type B and C leakage due to these components. Of the 26 valves of this type, only 3 varves failed to meet the assigned reference leak rate. These valves (2-FCV-74-57 and 2-FCV-74-58 tested simultaneously and 2-FCV-75-26) have been repaired and subsequent tests were completed satisfactorily. Based on past performance and recent test results any incremental increase in leakage due to an extension would not result in unacceptable leakage through these valves.

New Components

As a result of Appendix J program upgrades, 6 air tested components, 1 water sealed component, and 8 closed loop seismic class 1 components were added to the program. No historical data are available for these components; however, the integrity of the 6 air tested components was demonstrated during the Type A test performed in March 1991. The 8 closed-loop seismic class 1 components added to the program were tested upon completion of modifications to make these valves testable and at other times throughout the extended outage. No significant problems have been experienced with these valves since they were included in the Appendix J program. During an October 18, 1991 forced outage, these valves were tested to demonstrate valve closure for ASME Section XI. No leakage through these valves was identified.

JUSTIFICATION

10 CFR 50.12 states that the commission may grant exemptions from the requirements of the regulations contained in 10 CFR 50 provided that

- · The exemption is authorized by law;
- · The exemption does not present an undue risk to the public health and safety;
- · The requested exemption will not endanger the common defense and security;
- · Special circumstances are present as defined in 10 CFR 50.12 (a)(2).

I. The Requested Exemption is Authorized by Law

The Commission is authorized by law to grant this exemption.

II. The Requested Exemption Does Not Present an Undue Risk to the Public Health and Safety

The intent of sections III.D.2.(a) and III.D.3 of Appendix J is to ensure containment integrity is maintained. Based on the following information, the exemption requested will not significantly affect the ability of the individual primary containment components to perform their safety functions.

1. The valves and components for which the extension of the two year interval is being, requested are considered to be leak tight and in good condition. The leak tight condition of these components has been verified by Type B and C local leak rate tests and again for most by the Type A test conducted on unit 2 in March 1991. Based on the present containment leak rate that accounts for less than 17% of the 0.6-percent La limit, TVA believes the remaining margin is sufficient to ensure any incremental increases in leakage due to the extension will not result in unacceptable as found test results.

- 2. Based on historical data, any incremental increase in leakage due to the extension will be small (less than 18% of 0.6 La). Improved maintenance practices implemented during the unit 2 cycle 5 outage, including motor operator testing (MOVATS) of containment isolation valves, provides increased assurance that these components will perform their safety function.
- 3. Significant changes and improvements were made to the Browns Ferry LLRT program since the unit was shutdown in 1984. Numerous components previously untested were added to the program as a result of program reviews. Individual LLRT procedures were upgraded and detailed vaive line-ups, isometrics, and draining and venting instructions were added.
- 4. Maintenance and modification of components with poor leak performance history was performed to improve subsequent performance of these components. Post-modification and post-maintenance tests were completed satisfactorily.
- 5. Many of the components for which the exemption is requested were included in the Type A test performed in March 1991. This test indicated a containment leak rate of 0.24% per day, which is well below the 1.5% per day limit.

III. The Requested Exemption Will Not Endanger the Common Defense and Security

The common defense and security are not affected by this request for exemption.

IV. Special Circumstances are Present Which Necessitate the Request for an Exemption to the Regulations of 10 CFR 50, Appendix J, Sections III.D.2.(a) and III.D.3.

Per 10 CFR 50.12(a)(2), the following special circumstances are present

- 1. Application of the regulation in the particular circumstances present would not serve the intent of the regulation. The intent of the regulation is to assure containment integrity turough component performance. The expected incremental increases in component leakage due to the extension are small (less than 18% of 0.6 La). Assignment of the projected increase in total leakage due to the extension to the as-left leakage total reduces the margin between as-left leakage and 0.6 La by less than 22-percent. Since operation would be allowed for two years with less margin than is present even with the additional leakage due to the extension added to the as-left total, the requested exemption does not conflict with the intent of the regulation. Thus, the exemption to defer testing of the subject components until the next scheduled refueling is appropriate.
- 2. Compliance with the regulation would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted. The intent of the regulation is that the required testing be performed during normal refueling outages to ensure containment integrity. When the regulation was adopted, provisions to accommodate an 18 or 24-month fuel cycle

were not provided; thus increasing the likelihood of a plant shutdown to perform LLRTs. However, it was not the intent of the regulation to force a shutdown solely to perform Type B and C testing. A requirement to shutdown to perform LLRTs, even though the projected incremental increase in leakage due to extension of the test interval to the next scheduled refueling outage is minimal, would represent undue hardship and excessive costs in the form of increase personnel radiological exposure, lost revenues, and higher costs associated with two outages instead of one. Eliminating a shutdown to perform testing would also result in a savings of approximately \$8 million. Furthermore, a heatup and cooldown cycle is eliminated by increasing the test interval and would reduce the probability of events that are more likely to occur during such evolutions.

3. The exemption would provide only temporary relief from the regulation and TVA has made a good faith effort to strictly comply with the regulation. This exemption is being requested as a one-time schedular exemption to allow Unit 2 to operate until the next refueling outage scheduled to begin January 29, 1993. This request is a result of a longer than anticipated return to power sequence. In addition, by performing LLRT testing during forced outages, TVA has made a good faith effort to comply with the regulation.

SAFETY IMPACT

The extension of the LLRT test interval does not impact the probability of occurrence of any accident.

The present containment leakrate represents less than 17% of the maximum Type B and C leakage rate of 0.60 La allowed by TS. Thus a severe amount of additional degradation would have to occur for the TS limit to be exceeded. The potential for a large amount of degradation to occur during the extension period is small. Since the integrity of the containment boundary is not expected to be substantially diminished during the extension period, it is concluded that the proposed amendment does not involve a significant increase in the consequences of any accident previously evaluated.

Physical modifications are not being made and plant operations are not being changed. Consequently the containment system's ability to perform its intended function will be maintained, no new accident precursors are generated, and therefore no new or different kind of accident scenarios are created.

The present margin between the most recent as-left total leakrate and the 0.60 La limit is sufficient to allow for the additional projected leakage due to the extension. Therefore, extending the LLRT test interval will not result in a significant reduction in the margin of safety.

CONCLUSION

The valves and components for which the extension of the two year interval is being requested are considered to be leak tight and in good condition. The leak tight condition of these components has been verified by Type B and C local leak rate tests and again for most by the Type A test conducted on unit 2 in March 1991. Based on the present containment leak rate that accounts for less than 17% of the 0.6 La limit, TVA believes the remaining margin is sufficient to ensure any incremental increases in leakage due to the extension will not result in unacceptable as-found test results.

Based on historical data, any incremental increase in leakage due to the extension will be small (less than 18% of 0.6 La). Improved maintenance practices implemented during the unit 2 cycle 5 outage, including motor operator testing (MOVATS) of containment isolation valves, provides increased assurance that these components will perform their safety function.

On the average, as-left leak rates are less than 25% of the established reference leak rates for the components listed in Table 1. Since the maximum extension requested is relatively short in comparison to the two-year test interval (approximately 25%), it is unlikely that substantial degradation of containment components leading to failure of the containment to perform its safety function would occur.

Based on the discussion above, TVA concludes that the extension of the two year interval for the components listed in Table 1 will not impair valve operability or significantly degrade the integrity of primary containment and would not significantly increase the risk to the health and safety of the public.

LISTING OF TABLES

Table 1	Components Requiring Extension
Table 2	Projected Type B and C Leak Rates
Table 3	Projected Type C Seismic Class 1 Leak Rates
Table 4	Unit 2 Cycle 5 As-Found/As-Leit Test Results
Table 5	Unit 2 Forced Outage Testing Priority

TABLE 1
COMPONENTS REQUIRING EXTENSION

TYPE B TESTED COMPONENTS

Billows								
BELLOWS X.7B	XTENSION Days/Notes	51#	EXP. DATE		DESCRIPTION	ENETRATION	OMPONENT P	CC
REALOWS X-7B	27/1	g-2/9La	1/2/93	e A	Inboard Bellows MS La	X-2A	LLOWS	BE
Billows No.	27/1		1/2/93	ine A	Outboard Ballows No.	X-7A	LLOWS	BE
### BELOWS X.7B Outboard Bellows MS Line B 7/19/93 ### BELOWS X.7C Inboard Bellows MS Line C 1/19/93 ### BELOWS X.7D Outboard Bellows MS Line D 1/19/93 ### BELOWS X.7D Inboard Bellows MS Line D 1/19/93 ### BELOWS X.7D Outboard Bellows MS Line D 1/19/93 ### BELOWS X.7D Outboard Bellows MS Line D 1/19/93 ### BELOWS X.8 Inboard Bellows MS Drain 1/2/93 ### BELOWS X.8 Outboard Bellows MS Drain 1/2/93 ### BELOWS X.9A Inboard Bellows MS Drain 1/2/93 ### BELOWS X.9A Outboard Bellows MS Drain 1/2/93 ### BELOWS X.9A Outboard Bellows MS Drain 1/2/93 ### BELOWS X.9B Inboard Bellows FW Line A 30/10/92 ### BELOWS X.9B Outboard Bellows FW Line B 10/10/92 ### BELOWS X.9B Outboard Bellows FW Line B 10/10/92 ### BELOWS X.10 Outboard Bellows FCC Stearn 10/1/92 ### BELOWS X.11 Inboard Bellows FCC Stearn 1/20/93 ### BELOWS X.12 Outboard Bellows FCC Stearn 1/20/93 ### BELOWS X.13 Inboard Bellows FCC Stearn 1/20/93 ### BELOWS X.13 Inboard Bellows FCC Stearn 1/20/93 ### BELOWS X.13 Outboard Bellows FCC Discharge 1/2/18/92 ### BELOWS X.16 Inboard Bellows FCC Discharge 1/2/18/92 ### BELOWS X.16 Inboard Bellows FCC Discharge 1/2/18/92 ### BELOWS X.16 Outboard	10/1		1/19/93	e B	Inboard Bellows MS Li	X-7B	TTOMS	HE
RELLOWS X.7C	10/1			ine B	Outboard Bellows MS	X-7B	LLOWS	BE
Billows No.	10/1		1/19/93	e C	Inboard Bellows MS Li	X-7C	ILOWS	HE
RELLOWS X - FD	10/1		1/19/93	ine C	Outboard Bellows MS	X-7C	3LOWS	BE
RELLOWS X - B	10/1		1/19/93	e D	Inboard Bellows MS Li	X-7D	11.0WS	BB
RELLOWS X - B	10/1		1/19/93	ine D	Outboard Bellows MS	X-7D	LLOWS	BE
BELLOWS X.9A	27/1		1/2/93	ni n	Inboard Bellows MS D	X - 8	LLOWS	BE
BELLOWS X.9A	27/1		1/2/93	Main	Outboard Bellows MS	X - B	LLOWS	BB
BELOWS X-9B	111/1		10/10/92	t A	Inboard Bellows FW Li	X-9A	LLOWS	BE
BELLOWS X-9B	111/1		10/10/92	ine A	Outhoard Bellows FW	X-9A	LLOWS	BE
Billows X-10	111/1		10/10/92	5 B	Inboard Bellows PW Li	X-9B	ILOWS	BH
HELLOWS X-10	111/1		10/10/92	ine B	Outboard Bellows FW I	X-9B	LLOWS	BH
RELLOWS X-11	120/1		10/1/92	teara	Inboard Bellows RCIC	X-10	LLOWS	BE
Billows State St	120/1		10/1/92	Steam	Outboard Bellows RCI	X-10	LLOWS	BE
BBLLOWS X-12	9/1		1/20/93	leant.	Inboard Bellows HPCI	X-11	LLOWS	BE
BELLOWS X-12	9/1		1/20/93	Steam	Outboard Bellows HPC	X-11	LLOWS	BE
BESLOWS X-13A	42/1		12/18/92	uction	Inboard Bellows SDC	X-12	LLOWS	BE
RELLOWS X-13A	42/1		12/18/92					
BELLOWS X-13B	42/1		12/18/92			X-13A		
### BELLOWS X-13B C.F. oard Bellows RHR Discharge 12/18/92 #### BYLLOWS X-16A Inboard Bellows CS Discharge 12/18/92 ####################################	42/1			Discharge	Outboard Beliews RHI	X-13A		
### B*11.0WS	42/1		12/18/92			X-13B		
BELLOWS X-16A Outboard Bellows CS Discharge 12/18/92 BELLOWS X-16B Inboard Bellows CS Discharge 12/18/92 BELLOWS X-16B Outboard Bellows CS Discharge 12/18/92 E-PENETRATION X-100B Neutron Monitoring 9/16/92 8-2/EL-8 E-PENETRATION X-100C Neutron Monitoring 9/18/92 E-PENETRATION X-100D Neutron Monitoring 9/18/92 E-PENETRATION X-100E Neutron Monitoring 9/18/92 E-PENETRATION X-100F Neutron Monitoring 9/18/92 E-PENETRATION X-100G Neutron Monitoring 9/16/92 E-PENETRATION X-100G Neutron Monitoring 9/16/92 E-PENETRATION X-103 CRD Position Indication 9/18/92 E-PENETRATION X-104D Thermocouples 9/18/92 E-PENETRATION X-104E Indication & Control 9/18/92 E-PENETRATION X-104F Indication & Control 9/18/92 E-PENETRATION X-104F Indication & Control 9/18/92 E-PENETRATION X-105A Power 12/11/02 E-PENETRATION X-108B CRD Position Indication 9/18/92	42/1		12/18/92	Discharge	O.s. oard Bellows RHI	X-1±B	LOWS	BE
BELOWS X-16B	42/1		12/18/92	charge	Inboard Bellows CS D			
BELLOWS X-16B Outboard Bellows CS Discharge 12/18/92	4.2/1		12/18/92					
E-PENETRATION X-100B Neutron Monitoring 9/16/92 8-2/Fil.8	42/1		12/18/92	charge	Inboard Bellows CS D	X-16B		
E-PENETRATION X-100C Neutron Monitoring 9/18/92 E-PENETRATION X-100D Neutron Monitoring 9/18/92 E-PENETRATION X-100E Neutron Monitoring 9/18/92 E-PENETRATION X-100F Neutron Monitoring 9/18/92 E-PENETRATION X-100G Neutron Monitoring 9/16/92 E-PENETRATION X-103 CRD Position Indication 9/18/92 E-PENETRATION X-104D Thermocouples 9/18/92 E-PENETRATION X-104E Indication & Control 9/18/92 E-PENETRATION X-104F Indication & Control 9/18/92 E-PENETRATION X-105A Power 12/11/02 E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-110A Power 9/20/92 E-PENETRATION X-110B CRD Position Indication 9/18/92	42/1		12/18/92	Discharge	Outboard Beliews CS	X-16B	ILOWS	BE
E-PENETRATION X-100C Neutron Monitoring 9/18/92 E-PENETRATION X-100D Neutron Monitoring 9/18/92 E-PENETRATION X-100E Neutron Monitoring 9/18/92 E-PENETRATION X-100F Neutron Monitoring 9/16/92 E-PENETRATION X-100G Neutron Monitoring 9/16/92 E-PENETRATION X-103 CRD Position Indication 9/18/92 E-PENETRATION X-104D Thermocouples 9/18/92 E-PENETRATION X-104E Indication & Control 9/18/92 E-PENETRATION X-104F Indication & Control 9/18/92 E-PENETRATION X-105A Power 12/11/02 E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-110A Power 9/20/92 E-PENETRATION X-110B CRD Position Indication 9/18/92	135/2	н-2/ЕЦ.	9/16/92		Neutron Monitoring	X-100B	PENETRATION	B-1
E-PENETRATION X-100E Neutron Monitoring 9/18/92 E-PENETRATION X-100F Neutron Monitoring 9/16/92 E-PENETRATION X-100G Neutron Monitoring 9/16/92 E-PENETRATION X-103 CRD Position Indication 9/18/92 E-PENETRATION X-104D Thermocouples 9/18/92 E-PENETRATION X-104E Indication & Control 9/18/92 E-PENETRATION X-104F Indication & Control 9/18/92 E-PENETRATION X-105A Power 12/11/02 E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-110A Power 9/20/92 E-PENETRATION X-110B CRD Position Indication 9/18/92	733/2		9/18/9/2		Neutron Monitoring	X-100C	PENETRATION	E-F
E-PENETRATION X-100F Neutron Monitoring 9/10/97 E-PENETRATION X-100G Neutron Monitoring 9/16/92 E-PENETRATION X-103 CRD Position Indication 9/18/92 E-PENETRATION X-104D Thermocouples 9/18/92 E-PENETRATION X-104E Indication & Control 9/18/92 E-PENETRATION X-104F Indication & Control 9/18/92 E-PENETRATION X-105 A Power 12/11/02 E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-110A Power 9/20/92 E-PENETRATION X-110B CRD Position Indication 9/18/92	133/2		9/18/92		Neutron Monitoring		PENETRATION	E-F
E-PENETRATION X-100G Neutron Monitoring 9/16/92 E-PENETRATION X-103 CRD Position Indication 9/18/92 E-PENETRATION X-104D Thermocouples 9/18/92 E-PENETRATION X-104E Indication & Control 9/18/92 E-PENETRATION X-104F Indication & Control 9/18/92 E-PENETRATION X-105A Power 12/11/02 E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-110A Power 9/20/92 E-PENETRATION X-110B CRD Position Indication 9/18/92	133/2		9/18/92		Neutron Monitoring	X-100E	PENETRATION	Ed
E-PENETRATION X-103 CRD Position Indication 9/18/92 E-PENETRATION X-104D Thermocouples 9/18/92 E-PENETRATION X-104E Indication & Control 9/18/92 E-PENETRATION X-104F Indication & Control 9/18/92 E-PENETRATION X-105A Power 12/11/92 E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-110A Power 9/20/92 E-PENETRATION X-110B CRD Position Indication 9/18/92	131/2		9/20/92		Neutron Monitoring	X-100F		
E-PENETRATION X-104D Thermocouples 9/18/92 E-PENETRATION X-104E Indication & Control 9/18/92 E-PENETRATION X-104F Indication & Control 9/18/92 E-PENETRATION X-105A Power 12/11/92 E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-110A Power 9/20/92 E-PENETRATION X-110B CRD Position Indication 9/18/92	135/2		9/16/92		Neutron Monitoring	X-100G		
E-PENETRATION X-104D Thermocouples 9/18/92 E-PENETRATION X-104E Indication & Control 9/18/92 E-PENETRATION X-104F Indication & Control 9/18/92 E-PENETRATION X-105A Power 12/11/02 E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-110A Power 9/20/92 E-PENETRATION X-110B CRD Position Indication 9/18/92	133/2		9/18/92		CRD Position Indication			
E-PENETRATION X-104F Indication & Control 9/18/92 E-PENETRATION X-105A Power 12/11/02 E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-110A Power 9/20/92 E-PENETRATION X-110B CRD Position Indication 9/18/92	133/2				Thermocouples			
E-PENETRATION X-105A Power 12/11/02 E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-110A Power 9/20/92 E-PENETRATION X-110B CRD Position Indication 9/18/92	133/2		9/18/92		Indication & Control	X-104E	PENETRATION	E-F
E-PENETRATION X-105A Power 12/11/02 E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-110A Power 9/20/92 E-PENETRATION X-110B CRD Position Indication 9/18/92	133/2		9/18/92		Indication & Control			
E-PENETRATION X-108B CRD Position Indication 9/18/92 E-PENETRATION X-110A Power 9/20/92 E-PENETRATION X-110B CRD Position Indication 9/18/92	49/2				7. 20.00.20			
E-PENETRATION X-110A Power 9/20/92 E-PENETRATION X-110B CRD Position Indication 9/18/92	133/2				CRD Position Indication			
E-PENETRATION X-110B CRD Position Indication 9/18/92	131/2				Power	X-110A		
	133/2				CRD Position Indication			
E-PENETRATION X-219 PSC Vacuum Breakers 9/20/92	131/2		9/20/92		PSC Vacuum Breakers	X-219	PENETRATION	E-P

TABLE 1, (CONTINUED COMPONENTS REQUIRING EXTENSION

TYPE B TESTED COMPONENTS

COMPOS ENT	PENETRATION	DESCRIPTION	EXP. DATE	310	ECCTENSION Days/Notes
PLANCE PLANCE PLANCE PLANCE PLANCE	N/A N/A N/A N/A N/A	Shear Lug Access Cover 0° Shear Lug Access Cover 45° Shear Lug Access Cover 90° Shear Lug Access Cover 135° Shear Lug Access Cover 270° Shear Lug Access Cover 315°	1/17/93 1/17/93 1/16/93 1/16/93 1/17/93 1/17/93	g-2/Fiia	12/4 12/4 13/4 13/4 12/4
BONNET/PACKING BONNET/PACKING	20.000	2-PCV-71-59/601 2-PCV-73-64/642	1/20/93 1/20/93	g-2/PBb	9/3 9/3
BONNET/PACKING BONNET/PACKING BONNET		RCIC Vacuum Pump Discharge HPCI Turbine Exhaust Drain HPCI Turbine Exhaust	11/26/92 8/25/92 1/13/93	y-3/71e g-3/73c g-3/73b	64/3 167/3 16/6
TLANGE	64-19	Containment Ventilation	1/26/93	g-3/64s	3/7

COMPONENTS REQUIRING EXTENSION

TYPE C TESTED COMPONENTS

COMPONENT	PENETRATION	SENCRIPTION	EXP. DATE.	S1#	EXTENSION Days/Notes
2-2-1383	X-20	Demineralized Water	7/31/92	g-3/2	182/4
2-2-1192	X-20	Dominoralized Water	7/31/92	g-3/2	182/4
2-3-558	79A	Reactor Feedwater A	1/15/93	4-3,34	14/4
2-3-554	X-9A	Reactor Feedwater A	1/15/93	g-3/3a	14/4
2-T-CV-73-45	X-9A	ADCI Injection	1/15/93	g-3/3a	14/4
2-3-570	X-9B	Reactor Feedwater B	9/14/92	g-3/3b	137/4
2-3-568	X-9B	Reactor Foedwater B	9/14/92	g-3/3b	137/4
2-69-579	X-98	RWCU Return	9/14/92	g-3/3b	137/4
2-FCV-71-40	X-9B	RCIC Priention	9/14/92	g-3/3b	137/4
2-85-576	X-9B	CRD Return	9/14/92	£-3/36	137/4
2-32-336	X-22	Drywell Conuol Air Supply	8/5/92	g-3/32b	177/4
2-32-2163	X-22	Drywell Control Air Supply	8/20/92	8-3/326	162/4
2-84-617	X-22	CAD/DCA Tis In	8/5/92	N-3/32h	177/4
2-63-575	X-42	Standby Laquid Control	8/7/92	g-3/63	175/4
2-(3-526	X-42	Standby Liquid Control	8/7/92	8.3/63	175/4
2-6%-508	X-37C	RCP Scal Water	1/5/93	g-3/68a	24/4
2-68-350	X-37C	RCP Soul Water	1/5/93	g-3/68a	24/4
2-68-523	X-38C	RCP Seal Water	8/4/92	g-3/686	178/4
4-08-555	X-38C	RCP Seat Water	8/4/92	g-3/68b	178/4
2-FCV-69-1	X-14	RWCU Suction	9/5/92	g-3/69	146/4
2-PC\-89-2	X-14	RWCU Syction	9/5/92	g-3/69	146/4
2-FCV-70-47	X - 2.3	RBCCW 3mgra	12/5/92	g-3/70	55/4
2.70.506	X-24	RBCCW Supply	8/5/92	g-3/70	177/4
2-FCV-71-2/5	X-10	RCIC Steam Supply	1/24/93	g-3/71 s	5/4
2-HCY 73-23/603		UPCI Turbine Exhican	1/13/93	g-3/73b	16/3
2-FCV-74-47	X-12	RHR Shutdown Cooling	10/30/92	g-3/74g	91/4
2-FCV-74-48	X-12	KHR Shuidown Cooling	10/30/92	g-3/74g	91/4
2-74-661/662	X-12	RIIR Shutdown Cooling	10/30/92	g-3/74g	91/4
2-FCV-?7-2A	X-18	Drywell Floor Drain Sump	11/30/92	E-3/77a	60/4
2-FCV-77-2B	X-18	Drywell Floor Drain Surap	11/30/92	g-3/77s	60/4
2-PCV-77-15A	X-19	Drywell Equipment Drain Sump	11/30/92	g-3/77b	60/4
2-FCV-77-15B	X-19	Drywell Equipment Drain Sump	11/30/92	g-3/77b	60/4
				The second secon	

COMPONENTS REQUIRING EXTENSION

TYPE C TESTED COMPONENTS (WATER SEALED)

COMPONENT	PENETRATION	DE*CRIPTION	EXP. DATE	S1#	EXTENSION Days/Notes
2-HCV-71-32/592	0.5 (0.00)	RCIC Vacuum Pump Discharge	11/26/92	g-3/71e	64/3
2-HCV-73-24/609		HPCI Turbine Exhaust Drain	8/15/92	g-3/73c	167/3
2-FCV-71-18		RCIC Pump Suction	1/23/93	g-3/71d	6/3

COMPONENTS REQUIRING EXTENSION

TYPE C TESTED COMPONENTS (SEISMIC CLASS 1)

COMPONENT	PENETRATION	DESCRIPTION	EXP. DATE	SI#	EXTENSION Days/Notes
2-PCV-74-53	X-13A	KIIR Return	11/3/92	g-3/74s	87/4
2-FCV-74-54	X-13A	RHR Return	11/3/92	E-3/74E	87/4
2-FCV-74-57/58	X-211A	RHR Containment Spray	11/5/92	g-3/74b	85/5
2-PCV-14-60	X-39B	RHR Containment Spray	11/2/92	g-3/740	58/5
2-FCV-74-61	X-39B	RHR Containment Spray	11/2/92	g-3/74c	88/5
2-FCV-74-67	X-13B	RHR Return	11/1/92	g-3/74d	89/4
2-FCV-74-68	X-13B	RHR Return	11/9/92	g=3/74d	81/4
2-FCV-74-71/72	X-211B	RHR Containment Spray	11/15/92	g-3/74e	75/5
2-PCV-74-74	X-39A	RHR Containment Spray	11/1/92	E-3/74f	89/5
2-FCV-74-75	X-39A	RHR Containment Spray	11/1/92	8-3/741	89/5
2-74-792	N/A	RHR PSC Head Tunk Tie-in	9/8/92	g-3/741	143/5
2-74-804	N/A	RHR PSC Head Tank Tie-in	9/8/92	E-3/741	143/5
2-74-802	N/A	RHR PSC Head Tank Tie-in	10/24/92	R-S/741	97/5
2-74-803	N/A	RHR PSC Head Tank Tie-in	10/24/92	g-3/741	97/5
2-FCV-75-25	X-16A	Core Spray Injection	8/9/92	g-3/75a	173/4
2-FCV-75-26	X-16A	Core Spray Injection	8/9/92	g-3/75a	173/4
2-FCV-75-53	X-16B	Core Spray Injection	8/10/92	g-3/75b	172/4
2-FCV-75-54	X-16B	Core Spray Injection	8/25/92	g-3/75b	157/4
2-FCV-75-57/58	X-227A	PSC Level Control	9/4/92	g-3/75c	147/5
2-75-609	N/A	PSC Head Tank Tie-in	8/29/92	g-3/75d	153/5
2-75-610	N/A	PSC Head Tank Tie-in	8/29/92	g-3/75d	153/5
2-75-606	N/A	PSC Head Tank Tie-in	8/28/92	g-3/75e	154/5
2-75-607	N/A	PSC Head Tank Tie-in	8/28/92	g-3/75e	154/5

COMPONENTS REQUIRING EXTENSION

Notes:

- 1. Expansion bellows cannot be tested at power due to heat and radiological conditions.
- Electrical penetrations can be tested at power, but may unnecessarily increase the potential for challenges to safety systems.
- 3. These components cannot be tested at power because it would require emering a Limiting Condition for Operation in order to perform the tests. In addition, other Surveillance Instructions must be performed in order to demonstrate operability. Performance of these Surveillance Instructions in order to accommodate leak rate testing represents unnecessary challenges to safety systems.
- 4. Testing of these components requires drywell entry; therefore, these components cannot be tested at power.
- 5. Cannot be tested at power due to system alignments required for testing.
- 6. Can be tested at power, but requires scaffolding to be erected in the HPCI room.
- 7. Can be tested at power.

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PROJECTED TYPE B AND C LEAK RATES

-	Cycle 4		Cycle 5						Cycle 5					Astet
CONSTRUCTO	As-Left LR		AstroundLR	As-Left Date. As-Found LR As-Found Date	10	No. of Days	N/day	Days Extended	Asletia	Apileft Date	Projected LR.	A Salar PLR	Stefamence (R	% Reference LR
Air Tested Isolation Valves.														
0 10 10 10 10 10						1								
2.2.1385		0/8/83	D 6	011110	0 6	188	0.0000	291	0.3173	7/31/20	0.3173	0.0000	(P. 1)	31,73%
75.00.00	4.1684	10/23/82	1 0375		9 + 208	812	0.0000	144	0.000	4718/01	0 1008			1,09%
	5.1549	:0/23/82	107.63		102.4751	813	0.1280	91	1.5416	1/18/81	25.3126	1, 2848.	24	K 40%
2-73-45 (Note 4)	1.3244	10/23/82	232.31		230,9856	080	0.2321	137	4.5509	1/15/91	205 8218	31.8040	1.6	20 K1%
2-3-572	14.148	11/5/82	0.0082		14 1398	865	0.0000	137	1,551	9/14/90	1,5510		24	8.46%
2-3-568	2.443	11/7/82	0.0082		2.4348	863	0.0000	137	3.5025	9/14/90	3.5025	0.0000	2.4	14 50%
2-89-579 (Note 1)	0.1846	11/7/82	264.7912		264,6056	863	6.3068	137	2,3595	9/14/90	268.1926	42,0059	*	55 99 4
2-71-40	2.8023	11/7/82	0.5873	3/19/85	-2.215	863	0 0000	137	2.6237	9114/90	2.6237	0.0000	ú	43.73%
2.85.576	0	11/8/82	0.4475		0.6475	862	0.0005	137	1.1395	9/14/90	1.5896	0.0711	×	28.49%
(Note	0	9/5/82	41,905		41.906	825	0.0508	24	0.1633	175791	38.4628		0.75	21,77%
	0	975782	109.75	12/8/84	109.75	825	0.1330	2.4	0.2445	1,6761	100,5493	3.1927	0.75	32.50%
(Note	0.1583	975/82	ó		-0.1683	828	0.0000	178	0.0165	8/4/90	0.0165		0.75	2.20%
(Nicth	0.3492	9/5/82	24,7573		24,4081	826	0.0295	178	551,713	8/4/90	26.8477	5,2599	0.75	2.20%
2.52.336	0.242	9/3/82	0.0093		-0.2327	1003	0.0000	177	0.0166	8/5/90	0.0186		*	1.66%
2.32.2163	0.2583	12/5/82	0.2629		0.0046	910	0.0000	162	0.253	8/20/90	0.2575	0.0008		25.30%
2.84.617	MA	NVA.	N/A		NIA	N/A	NZA	177	0,0166	3/5/90	1,0000	1,0000	41	1.86%
2-63-525	0,2965	9/5/82	0.0094		0.2871	858	0.0000	175	0.0175	8/7/90	0.0175		3.5	1.17%
2-63-525	0	8/8/82	2.0094		0.0094	956	0.0000	175	0.0165	8/7/90	0.0254	0.0017	6.0	1.10%
2-89-1	0.2434	11/9/62	0.0551	9720/85	0.1883	1046	0.0000	146	0.5084	975/90	0.5084		sp	1.47%
2.69.2	4,150,7	11/11/82	0.0551		-4.1056	1044	0.0000	145	3.9454	06/9/6	3.9454	0.0000	10	66.78%
2-70-47	N/A	NIA	N/A		NVA	NIA	NA	90 90	0.0171	12/5/90	5.0000	5.0000	.ep	0.34%
-00	NIA.	N/A	N/A		N/A	NZA	N/A	122	0.0165	8/5/90	5.0000	5.0000	10	0.33%
8	0	9/4/92	51.888	10	51.888	1052	0.0493	40	0.0167	1/24/91	36.2692	0.2466	es	0.56%
2 73-23/603 (Note 5)	N/A	N/A	NIA		NZA	NIA	NIA	16	6.5971	1/113/81	20.0000	20,0000	5.0	32.99%
2001.47	0	10/7/82	12.1129		12.1129	829	0.0146	40	3,6238	10/35/01	15.6158	1,3296	20	18 12%
2	16.9234	10/7/82	4.3393		12.5841	829	0.0000	1.6	5.5614	10/30/90	5.5614		20	27.81%
2-74 51/562	0.1841	10/7/82	0.0506		-0.1335	828	0.0000	6	0.721	10/30/90	0.7210		0.75	96.13%
2-77-2AS	0	10/29/62	2,4294	1713/85	2.4294	807	0.0030	. 60	1.2342	11/30/90	3.6124	0.1806	6	41.14%
0-77-16A-1-5B	0	10/24/82	2.1564		2.1564	812	0.0027	80	1,8724	11/30/90	3.7704	0,1593	-01	56.75%
Espair - ellows	0.0494	NUA	0.0448	N/A	-0.0045	720	0.0000	120	0.1065	10/1/90	0.1013	0.0000	1.5	7.10%
Electrical Penatrations	1,4545	N/A	3.5112	N/A	2.0566	720	0.0029	136	2.3453	9/13/90	4.8189	0.3885	3.3	27.07%
Bonnets/Packing	NUA	N/A	NIA	N/A	N/A	N/A	N/A	157	0.0508	9/3/80	0.0506	0.0000	0	NIA
Farges	0.1049	9/16/82	0.1655	9/17/84	0.0505	732	0.0001	13	0.1861	1/16/91	0.2476	0.0011	0.77766	23.96%
Total Max PLR/Increase Average % of Reference LR (As-Left)	(1961)											117.4066		24.31%

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PROJECTED TYPE B AND C LEAK RATES

COMPONENT	Cycle & As Latt LR	As-Left Date	Cycle 5 As-Found LR	Cycle 4 Cycle 5 Asilati LR Asilati Date Asformid R Asformid Date	*	No. C. Tays	S-day	No. c. "lays - 3-day - Days Estended	Cycle C As Left LR	As Last Date	As Left Date Projected (R. Albber PLR	A Mass PLR	An-Left Reference LR 15. Sehvence LS	As Left A Selection LR
Water Sealed Isolation Valves														
1-71-32/552	0	10/8/82	0.003	10/25/84	0.003	7.05.1	0.000004	9.6	0.003	11/26/90	0.0082	0.0003	0.1	2.00%
2-73-24/609	0	8/8/84	0.003	10/27/84	0.003	7.9	8.00000.8		0.0167	8/15/90	0.0508	0.0063	1.0	16.70%
2.71-18	W/W	N/A	N/A	NIA	N/A	NIA	N/A	w.	40.0	1/23/91	0.3006	0.3000	6.0	30.00%
Total Mor PLR(WS) increase Average % of Reference (3) (As.) eth	Table 1											0.3066		

TABLE 2, (CONTINUED) ROJECTED TYPE B AND C LEAK RATES

VOTES

- A new seat was installed in 2-69-579 during Cycle 5. Subsequent testing was satisfactory.
- 2. 2-5c 75, 2-68-523, 2-68-550, and 2-66-508 were cut out and replaced to improve leakage performance. Subsequent testing was satisfactory.
- 3. 2-3-554 was modified diring ti. Dycle 5 outage to improve leakage performance.
- 4. 2-FCV-73-45 was replaced with a different type of valve during Cycle 5 to improve leakage performance.
- 5, 2-HCV-73-23/603 required extensive maintenance to meet air test acceptance criteria.
- 6. 2-FCV-71-2/3 failed the cycle 5 as-founce of the st due to a large packing leak. Packing has been modified and is now live load type. Subsequent testing was satisfactory.

The following general notes are applicable to the 2 in its entirety:

- 1. The average length of extension requested is 115 days (16% extension).
- 2. In accordance with ANSI 56.8, measured leak rates that are below the calculated test error are reported as the test error.
- The extended interval between as-found and as-left tests was due to the extended Cycle 5 outage.

COMPONENT	Cycle 4 As-Left LR	As-Left Date	Cycle 5 As-Found LA	As-Found Date	۵	No. of Days	∆/day	Days Extended	Cycle 5 As-Left LR	As-Left Date	Projected LR	Δ Max PLR	Reference LR	As-Left %-Reference LR
Seismic Class I Com	ponents													
2-74-53	0.0198	1,20/83	0.0477	12/8/84	0.0279	688	0.0000	87	0.009	11/3/90	0.0421		1.2	0.75%
2-74-54	0.5065	9/2/82	0.27	12/8/84	-0.2385	828	0.0000	87	0.549	11/3/90	0.5490	0.0000	1.2	45.75%
2-74-57/58	0.441	12/31/82	48.6154	10/28/84	48.1784	667	0.0722	85	0.396	11/5/90	59,2647	6.1397	0.6	56.30%
2-74-50/61	0.01	10/5/82	0.0144	12/9/84	-0.0036	796	0.0000	88	0.3375	11/2/90	0.3375	0.0000	0.6	56.25%
2-74-87	0.072	9/2/82	0.2286	11/2/84	0.1568	792	0.0002	89	0.2565	11/1/90	0.4184		1.2	21.38%
2-74-68	0.108	9:2/82	0.243	11/2/84	0.135	792	0.0002	81	0.436	11/9/90	0.5742	0.0138	1.2	36.33%
2-74-71/72	0.1149	10/6/82	0.3558	0/28/84	0.2-36	753	0.0003	75	0.576	11/15/90	0.8332	0.0240	0.6	96.00%
2-74-74/75	0.135	9/2/82	0.0036	6/23/66	9.1314	1025	0.0000	89	0.6075	11/1/90	0.6075	0.0000	0.6	101.25%
	tv/A	N/A	N/A	N/A	N/A	N/A	N/A	143	0.0056	9/8/90	0.1000	0.1000	0.3	5.80%
2-74-792	N/A	N/A	N/A	N/A	N/A	N/A	N/A	143	0.0038	9/8/90	0.1000		0.1	3.60%
	N/A	N/A	N/A	N/A	N/A	N/A	N/A	97	0.0036	10/24/90	0.1000	0.1000	0.3	3.60%
2-74-802	N'A	N/A	N/A	N/A	N/A	N/A	N/A	97	0.0036	10/24/90	0.1000		0.1	3.60%
2-74-903	0	9/4/82	0.0063	5/23/85	0.0063	1023	0.0000	173	0.135	8/9/90	0.1466		0.6	22.50%
2-75-25	0.0225	9/4/82	2.193	6/23/85	2,1105	1023	0.0021	173	0.0225	8/9/90	1.8854	0.3569	0.6	3.75%
2-75-26		9/4/82	0.66	2/10/65	-0.0162	890	0.0000	172	0.1125	8/10/90	0.1125		0.6	18.75%
2-75-53	0.0225	9/4/82	0.1278	2/10/85	0.2772	890	0.0000	157	0.198	8/25/90	0.1980	0.0000	0.6	33.00%
2-75-54	0.405			3/16/85	-0.2647	924	0.0000	147	0.009	9/4/90	0.0090	0.0000	0.15	8.00%
2-75-57/58	0.261	3/4/82 N/A	0.0063 N/A	N/A	N/A	N/A	N/A	153	0.009	8/29/90	0.1000	0.1000	0.1	9.00%
2-75-609	N/A	N/A	N/A	N/A	N/A	N/A	N/A	153	0.0036	8/29/90	0.1000		0.1	3.60%
2-75-610	N/A		N/A	N/A	N/A	N/A	N/A	154	0.0056	8/28/90	0.1000	0.1000	0.1	5.60%
2-75-606	N/A	N/A			N/A	N/A	N/A	154	0.0027	8/28/90	0.1000		0.1	2.70%
2-75-807	N/A	N/A	N/A	N/A	ne.s	N.A	1000	134						
Seismic Class / Path i	increase											6.9344		
														25.95%

Average % of Reference LR (As-Lett)

PROJECTION METHODOLOGY UTILIZED FOR TABLES 2 AND 3

The following methodology was used to determine the projected leak rates (LR).

- 1. Unit 2 cycle 4 as-left data and cycle 5 as-found data were used to obtain the increase in leak rate over the operating cycle (D).
- 2. The increase in leak rate was then divided by the number of days between the as-left and as-found dates (D/day).
- 3. The D/day for each component was multiplied by the number of days of the requested extension plus the two-year interval to obtain the projected LR.
- 4. The increase in the total maximum path leak rate (D Max PLR) was then determined using plant instructions for guidance.

The following conventions were used in calculating the total maximum path leakage rate increase and projected component leak rates.

- 1. All D less than zero were considered to be zero for the purposes of these calculations.
- 2. Twelve valves included in the extension were added to the Appendix J program in cycle 5; therefore, no historical information was available. The projected leak rate for these components was considered to be the reference leak rate.
- 3. Expansion bellows, flanges, and electrical penetrations were not considered as individual components. Historical information indicates no significant increases in as-found leak rates. Total as-found and as-left leak rates for all electrical pen penetrations, flanges, and all bellows penetrations were used in the calculations.
- 4. The bonnet and packing tests performed on 2-HCV-71-32 and 2-HCV-73-24 were added to the Appendix J program in cycle 5. No historical information is available. However, since resilient seals that were part of the Appendix J program have not been a problem in the past, no significant increase in leakage for these components is anticipated.

PROJECTION METHODOLOGY UTILIZED FOR TABLES 2 AND 3, (CONTINUED)

- Projected leak rates for Seismic class I components that are water filled or in service during a design basis accident were calculated; however leakage through these components has no impact on the Type B and C leakage limit.
- 6. 2-HCV-73-23/603 were previously tested with water instead of air. Historical data with air as a test medium are not available. The projected leak rate for these components was considered to be the reference leak rate.

TABLE 4

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UNIT 2, CYCLE 5 AS-FOUND/AS-LEFT TEST RESULTS

	CC .		ASFOUNDLR	AF DATE	POST-MAINT LR		ASUFTUR	AL DATE	COMMENTS
9	20	Personnel Airlock	27.1465	9/15/84	17.4144	6/22/91	34.8304	10/20/91	51 psi Test (10-20-91)
D	6.05	X-7A MS Line A Bellows Inboard	0.0002	3/20/85			0.00313	1/2/31	
2	0 1	X-7A MS Line A Bellows Outboard		3/20/85			0.003"2	1/2/91	
	L	X-78 MS Line B Bellows Duthoard	0.0014	3/22/85			0.0024	1/19/9/	
	0.05	X-70 MS Line C Bellows Inboard		3/22/85			0.0031	1/18/91	
	0.05	X-7C MS Line C Bellows Outboard	0.0014	3/22/85			0.0031	1/19.31	
	0.05	X-7D MS Line D Bellows Imboard	0.0014	3/22/85			0.0031	1/19/61/1	
	0.05	X-7D MS Line D Ballows Outboard		3/22/85			0.0031	1/19/91	
	0.05	X-8 MS Drein Bellows Inboard	0.0004	3/20/85			0.001	1/2/91	
	0 02	X-6 MS Drain Bellows Outboard	0.0011	9/18/85			103.0	1/2/91	
	0.05	X.9A "A" Feedwater Bellows Inboard	0.0013	9/17/85			0.003	10/10/90	
	0.05	X-9A "A" Feedwater Bellows Outboard	0.0013	9/17/85			0.003	10/10/90	
	0.05	X-98 "B" Felidwater Ballows Inboard	0.0014	3/22/85			0.003	10/10/10/90	
	0.05	X-98 "8" Feedwater Beilows Outboard	0.0014	3/22/85			0.003	16/10/90	
	0.05	X-10 RCIC Steam Line Bellows Intocard	900000	9/18/85			0.00053	10/1/90	
	0.05	X-10 RCIC Steam Line Bellows Outboard	0.0006	9/18/85			0.00052	10/1/90	
	0.05	X-11 HPCI Steam Line Beltows Inboard	0.0006	9/18/85			0.00318	1/20/91	
	0.05	X-11 HPCI Steam Line Bellows Outboard	90000	9/19/85			0.00142	1/20/91	
	0.05	X-12 RHR SDC Line Bellows Intopard	0.0012	3/19/85			0.0026	12/18/90	
	0.05	X-12 RHP SDC Line Baltows Our count	0.0012	3/19/85	0.0178	4/22/88	0.0026	12/18/90	
	0.05	X-13A RHR Disch Line Bellows Inboard	0.002	3/19/85			0.0022	12/18/90	
	0.05	X-13A Fuff Disch Line Bellows Outboard	0.002	8/8			0.0022	12/18/90	
	0.05	X 138 PHR Disch Line Bellows Inboard	0.0101	3/19/85			0.0376	12/18/90	
	0.05	X-138 PHR Disch Line Bellows Outboard	0.0015				0.003	12/18/90	
	0.03	X-14 RWCU Suction Line Bellows Intocard		9/20/85			0,0014	2/2/91	
1	0.00			9/20/85			0.0014	272/91	
1	0.03			3/11/85			0.0023	12/19/90	
	0.05		0.0011	3/11/85	The second second	-	0.0023	12/19/90	
1	0.03		0.0011	3/11/85			0.0023	12/18/90	
+	0.03	X-158 CS Plimp Uscharge Line Bellows Outboard	0.0011	3/11/85			0.0023	12/19/90	
	0.00	A 17 MIN V MARKO COPING GENERAL PROCESTO	0.0006	3/14/80	-		N/A	N/A	
7	0.70	N. 100 B. C. Dunar	0.0000	3/14/83	A 0.00 EAN	00144100	N/A	N/A	
+	0.4	X-1008 Nautro: Nont El Panal	0.1058	2/3/85		11/14/80	0 10307	114810	
3 12		X-100C Nautron Monit El Panat	0.0848	2/40/85	0.0855	10/12/89	0.0826	0/3	
+-	0.1	X-10"D Nautron Monit, El. Penet	0.0845	2/10/85	0.0849	10/18/89	0.0824	2/2	
	10	X 100E Nactron Monit El Panal	0.0845	2716/85	1 ALK	16/12/20	0.0828	0	
	0.1	X-1005 Neumon Morrit El Penat	0.0841	2/10/85	0.0847	10/17/89	0.0824	9/20/90	
	0.1	X-100G Neutron Monit, El. Penet.	0.1033	7/21:85	0.1178	10/13/89	0.1018	9/16/90	
	0.4	X-101A RCP Power El. Penet.	0.0884	9/16/85	0.0878	9/22/95	0.0905	10/20/91	
	0.1	X-10:8 RCP Power El. Panet.	0.0837	9/16/85	0.3832	9/22/90	0.1904	10/20/91	Leakage accepted by NDE III
	0.1	X-101 C RCP Power El. Panet.	0.1028	7/21/85	0.1336	9/22/80	0.1067	19/19/91	
	0.1	X-101D RCP Power El. Penet.	0.0873	7/21/85	0.0883	8/22/90	0.0899	10/19/91	
	0.1	X-102 Thermocouple El. Pener	0.1063	2/3/85	0.1025	9/15/90	0.1064	12/9/81	
	0.1	X-103 CHID Pos. Ind. El. Penet.	0.0841	2/9/85	0.085	10/19/89	0.0827	9/18/90	
	0.1	X-104A I&C El. Penet.	0.0896	2/3/85	1.346	12/9/91	0.0904	12/9/91	
	0.1	X-1048 CHD Pas, Ind. El Penet.	0.0894	2/3/85	0.1506	8/17/90	0.091	12/9/91	
	0.1	X-104C Meutron Monit. El Panet.	0.0897	2/3/85	0.0867	9/15/80	0.0894	10/20/91	
	0.1	E.		2/10/85	0.1197	10/20/89	0.1241	9/18/90	Leakage accepted by NDE III
	0.1	X-104E ISC El, Panet.	0.0877	2/10/85	0.0073	10/17/89	0.00728	06/81/6	
	0.1	d.	6,3003	7/10/85	0.0004	11/30/87	0.0012	9/18/90	
	10	W. + OK & Dougor C. Douge							

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TABLE 4, (CONTINUED)

SURVEBLANCE INSTRUCTION	n	REF.LR	COMPONENTS	ASFOUNDLA	Ar DAIR	POST-MAINT. LT	raionie	WARD OF	AS DATE	COMMENTS
9.5147 # 2 0-2/F18		0.1	X-1058 RCP Fower El. Penet.	0.0838	9/18/85	0.0834	8/22/90	0.0858	10/20/91	
Or Or		0.1	X-105C RCP Power El Panet.	0.103	7/21/85	0.1032	9/22/90	0.107	10/19/91	
2-81-4.7 A 2-3-2/ELD		0.1	X-105D Power El. Penet.	6.2145	7/21/85	2.7458	9/21/90	0.00073	2/18/91	Section of the last of the las
		0.1	X-106A CRD Pos. Ind. El. Penet.	0.103	7/21/85	0.10287	9/16/90	0.1076	12/9/91	The state of the same department of the same of
		0.1	X-106B Nautron Monit. El. Penet.	0.1057	2/3/85	0.1024	9/15/90	0.1065	10/20/91	
		0.1	X-107A Mautrun Monit, El. Penet.	0.1059	2/3/85	0.01	12/11/90	0.0297	10/20/91	The second name of the last of
		+ 0	X-1078 Neutro: Montt, El. Penet.	0.1036	2/3/85	0.0182	9/17/90	6,0099	10/20/91	
		0.1	X-108A Power El. Penet.	0.6447	12/8/84	3.1613	1/12/91	0.00228	2/18/91	And in contrast of the last of
		0.1	X-1068 CRD Pos. Ind. El. Penet.	0.0879	2/8/85	0.0882	10/20/89	0.0866	9/18/90	Secretary and sections
		0.1	X-109 CRD Plus, Ind. El. Panet.	0.0868	7/21/85	0.08634	9/16/90	0.0901	12/8/91	
	-		X.110A Power El Paesat	0.0887	12/9/84	0.0888	11/16/87	0.0873	9/20/90	
		10	X.1508 CBD Pos. ind Fil Panet	0.0843	2/9/85	0.0951	10/19/89	0.0828	9/18/90	
			X 219 PSC Vacuum Brite El Panet	0.0061	3/15/85			0.0002	3/20/90	
4 Ct 4 7 8 2 4 25 sis	19	0.04	X-1.8 Foulthment Hatch			0.0349	3/16/91	0.04	1/26/91	Opened Before AF test performed
	,	0.04	X 18 Fourment Hatch	0.0614	9/18/84	0.0202	3/10/91	0.02517	3/26/91	
S CA T A D A DIETH	>	0.008	X-s DW Head Access	0.0001	10/28/85	0.017	10/15/88	0.00028	3.12/91	
200	-	0.008	X-6 CRD Hatch	0.0005	10/22/84	0.0041	9/28/89	0.00027	2,9/91	
	-	0.001	X 25.4 TiP Indexer Flence	0.0001	3/16/85	0.0004	10:13/89	0.00008	277,0791	
		0.004	X. 345R TRP Indoxer Flance	0.0001	3/16/85	0.0002	10/13/89	0.00011	2720/91	
The state of the s		0.001	X.35C TIP Indexer Flanse	0.0001	3/16/85	7000.0	10/13/89	0.00008	2/20/91	
		0.003	X-35D TSP Indexer Flance	0.0001	3/16/85	0.0001	10/13/89	0.00008	2/26/91	
		0.001	X.35E TIP Indexer Flange	0.0001	3/16/85	0.0001	10/13/89	0.00008	2/20/91	
		0.001	X.35F TIP Indexer Purge Flange	0.0001	3/16/85	0.0001	7/2/90	0.00009	2/20/91	
		0.001	X-35G Poere	0.0001	3/16/85	9,0008	772790	0.00011	2/20/91	
		0.002	X-47 Power Operation Test Flange	C.00027	2/2/91			0.00027	272/91	
		0.015	X-200A Tonis Access Hatch	0.0004	9/17/84	0.0002	10/19/91	0.0006	13/20/11	
		0.015	X-2008 Torus Access Hatch	0.0002	9/17/84			0.00017	2/8/8:	A STATE OF THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER.
			X-223 Torus Access Hatch	100000	8/17/84			0.0003	2/8/81	
		1	X-? Drywell Head	1010	9/24/84	6.1541	3/14/91	0.1058	4/13/91	
		0.095	X-7 Sheer Lug Flange 0"	100001	3/17/85	0 0007	10,4/89	0.0003	1/17/91	
			X-? Shear Lug Flange 45°	0 0001	3/17/85			0.0002	1/17/81	
		0.005	X-7 Sheur Lug Flanne 30"	0.0001	3/17/85			0.0005	1/16/91	
			X.? Shear Lug Flange 135°	0.0001	3/17/85			0.0004		
		П	X-? Sher Lug Flenge 180"	0.0001	3/17/85	0.00524	1/17/91	0.00831		Leavings accepted by NOE III
The second second second second		т	X-7 Sheer Lug Flende 225	0.0002	3/17/85	0.0147	1/17/91	0.0027	3/11/91	
		П	X-7 Shear Lug Fignos 270*	0.0001	3/17/85	0.003	10/5/89	0.0002	1/17/91	
	-	17	X.7 Shaar Luc Pende 3°5°	0.0001	3/17/85	0.0007	10/4/89	0.0002	1/17/91	
T	-	Г	71.587					0.0168	1/29/91	
F-01-4, / A.S. g. 2.1 Dec		Ī	71.508					0.0168	1/29/01	
The second second		T	77.599					0.0168	1/29/91	
	-		71-800					0.0569	1129791	Leaksgy scorepted by NDE III
		T	73 633					0.0172	2/2/91	
		ľ	75-634					0.0172	212/91	
		T	73 635					0.0172	2/2/91	
		Γ	73-636					0.6172	2/2/31	
SSLATAS A SIDAN	1 1 1	0	71-59/601 8+P			0	7/16/90	ą	1/20/91	

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TABLE 4, (CONTINUED)

SUPPLETANCE INSTRUCTION	Ð	V W/A	A HEFTIN	COMPONENTS	ASTONIAL UT	M CMIE	PUDSI - MARINI LIM	TROMIC	1011000		
3v1a	+	×	*	1 - 14/15	13.085	9/20/84	149.703	16/9/1	7.0599	1/21/91	
3/12!	-			1 - 16	N/A	N.A			N/A	N/A	
3/182	n	V	11	4.	N/A	75/K			N/A	N/M	
2 3/16		× ×	11	1 - 26/27	3017.8	9/24/84	81.731	16/9/1	8.027	1/31/91	
3/16/	D	×		1.26	N/A	74/A			74/A	NA/A	
3/152	+	4 4	11	4 4728	0.0000	0/22:8A	346 21	1/8/8/	0.3511	1/31/91	
3/1C	-	> 3		1 - 37	N/A	N/A			N/A	N/A	
37.10.1	0 10	5 41		1 - 36	N/A	14/A			N/A	N/A	
2010	F	, W		1 - 51/52	17.420	9/22/84	12.4623	9/2/6	0.6999	1/31/91	
2010	H	V		1 - 51	N/A	N/A	2.0488	12/22/88	14/A	N/6	
2/140	+	A	-	1.52	N/A	N/A			MIA	N/A	
74/10	+	A	(2)	1 - 55/56	1249.5	1/13/85	2.49	9/19/88	2.0739	2/4/91	
7.8.20.3/2	-	V	-		0.0093	6/1/85	0,1371	9/12/68	0.0169	7/31/90	
4	-	×	**	2 - 1192	0.0093	6/1/85	0.4318	9/13/88	0.3173	7/31/90	
\$ 2 m Was	13	*	24	3 - 556	1.0375	1/13/8.			9,1938	1/15/91	
100		*	24	3 - 554	107.63	1/13/85	6.3479	8/13/86	1.5415	1/15/91	
		*	14	73 - 44	0.0082	7/14/85	50.3884	1115/91	N/A	N:A	
		+<	1.0	73 - 45	232.21	7/13/85			4.5509	1/15/91	
-3/3a1	-	/ . A	24	3 - 558	A/A	N/A	5.8637	8/20/88	M/A	N/A	
\$ 20.3/392	N N	*	24		N	N/A	7.303	8/20/88	N/A	N/A	
3/3/34	0	A	4.4		N/A	N/A			N/A	PE/A	
3/385	n	A	4	73 - 45	N/A	N/A	0.1256	10/1/89	N/A	N/A	
3/36	n	A	24		0.0082	3/19/85			1.551	9/14/90	
		¥	24		0.0082	3/19/85			3.5025	9/14/90	
		44	**	69 - 579	264.75	3/19/85	0.1576	5/20/86	2.3595	9/14/90	
		×	0	71 - 39	0.0083	3/19/85	1.7979	9/14/90	N/A	N/A	
		4C	9		0.5873	3/19/85			2.6237	9/14/90	
		∀	4		0.4474	3/19/85			1305	9/14/90	
g-3/3b1		×	24		N/A	N/A	2,2936	8/26/88	N/A	N/A	
3/362	A B	<	24	7	N/A	M/A	0.1261	8/28/38	K .	N/A	
3/363		×	47	- 1	N/A	N/A	1.6654	8/11/00	N. W	10.7	
3/3b4	-	*	9		N/A	N/A	0.757	200000000000000000000000000000000000000	No. of	NS.A.	
3/3b5		K	Q.	3	W. W.	78/A	2,0433	00/53/00	20.3	MAY A	
3/356	4	eg .	ø		10 May 10 M	2010	0.01.0	000000000000000000000000000000000000000	0.000.0	7/90/00	
g-3/12	+	3	0 0	12 - 738	0.00135	7/13/85	0.0036	10/26/89	0 0091	7/30/90	
	+	20			A 2724	E14/25	0.6177	10/28/90	0 0535	10/13/01	
9-3/32a	2 2	oc «	ń .		0 0003	6/2/83	0.0177	5/23/88	0.01656	8/5/90	
3/3/2/D	-	2 4		137	0.2629	6/2/85	1,7%85	8/12/90	0.253	8/20/90	
				84 - 617	N/A	MA	0.0177	5/23/88	0.01656	8/5/90	
C1 4 7 A 5 A 2/22c	li V	4		32.2516	N/A	4/A	*	12/26/30	0.0168	2/5/91	
OF LOCAL	H			32.2521	N/A	10/A	4.3529	12/26/90	0.0168	2/5/91	
		×		84-680	N/A	N/A	4.1713	12/26/90	0.0168	2/5/91	
St.47.426.3/33	A P				0.8695	6/2/85	0.04352	7/31/90	0.2712	10/20/81	
		es.		23 - 1070	0.652	6/2/85	0.016€	7/31/80	0.2723	10/20/91	
S147 A 2 0-3/438	2 0		0.75		0.0082	7120/85	0.5172	2/13/89	0.0179	2/13/91	
		st.	0.75	43 - 14	0.0753	7720785	0.0172	2/13/89	0,2806	2/13/91	
SI4,7.4.2 g-3/43b	20		0.038	43 - 28A	0.0017	5/4/85	0.001	8/16/83	5.00316	10/3/90	
		3	0.038		0,0195	5/4/85	5.001	8/16/88	0.00236	10/3/90	
St. 4.7 A.2 ts 3 43c	V U	L.	860.0	43 - 29A	0.005	5/4/85	0.0025	8/16/88	0.0563	8/1/90	
Of Party of											

SURVEILLANCE INSTRUCTION	U	V	W/A	REF.LR	COMPONENTS	AS-FOUNDER	AF DATE	POST MAINT LR	PMDATE	AS-LEFT LR	AL DATE	COMMENTS
									T-10-(0-)		0.10.01	
2-St-4.7 A.2.g-3/43d	IJ	V	A	0.5	43 - 40	N/A	N/A	0.3487	3/3/91	0.3538	3/13/91	Total Commence of the Market
			A	0.5	43 - 42	N/A	N/A	0.3822	3/3/91	0.6863	3/13/91	Leakage accepted by NDE
2-SI-4.7.A.2.g-3/43e	U	V	W	0.025	43 - 50	N/A	N/A	0.30265	3/3/91	0.002	3/12/91	
			W	0.025	43 - 56	N/A	N/A	0.00091	3/3/91	0.0009	3/12/91	
2-SI-4.7.A.2.g-3/43f	U	V	A	0.5	43 - 70	N/A	N/A	N/A	N/A	0.0173	3/3/91	
2-SI-4.7.A.2.g-3/63	IJ	٧	Α	1.5	63 - 525	0.0094	4/21/85	13.0246	7/27/90	0.0175	8/7/90	
			A	1.5	63 - 526	0.6094	4/21/85	0.0831	9/1/88	0.0165	8/7/90	
2-SI-4.7 A 2-g-3/64a	U	V	A	10	64 - 17/18/19/76-24	3:8.47	12/8/84	109.8725	12/22/90	3.0469	2/3/91	
			A	0	64 - 18FL	0.00179	6/10/87	0.0169	10/24/88	0.2447	2/3/91	Leakage accepted by NDE
			A	0	64 - 19FL	0.0033	6/10/87	0.0169	10/24/68	0.0168	1/26/91	
2-SI-4.7.A.2.g-3/64t	U	V	A	20	64 - 20/800	18.038	12/9/84	0.4167	1/3/91	1.3721	5/7/91	ماشار المالية المالية
2 SI T. I. M. L. g SI O'L	-		A	0	64 - 20FL	0.30068	6/10/87	0.0173	1/3/91	0.0179	5/7/91	
2-SI-4.7.A.2.g-3/64c	U	V	A	20	64 - 21/801	120.75	12/9/84	0.0178	4/21/88	0.0173	3/4/91	
E DI 4. FUNE DE DE TOTO			Α	0	64 - 21FL	0.00016	6/10/87	0.0178	4/21/88	0.0173	3/4/91	
2-SI-4.7.A.2.g-3/64d	U	V	A	10	64 - 29/30/32/33/84-19	104.33	12/8/84	316.4809	5/17/89	1.1871	5/1/91	
2-31-4.7.R.E.W 3-0-40	-		A	0	64 - 29FL	0.00028	6/10/87	0.0176	8/2/88	0.0177	5/1/91	
			A	0	64 - 32FL	0.00958	6/10/87	0.0176	8/2/88	0.0177	5/1/91	
20112240-2014	IJ	V	A	2	64 - 31/34/139/140/84-20	0.0094	12/8/84	1,2409	7/10/91	0.351	7/10/91	
2-SI-4.7.A.2.g-3/64e	3		A	0	64 - 31FL	0.00028	6/11/87	0.0175	7/11/88	0.018	3/9/91	
			A	0	64 - 34FL	0.00006	6/10/87	0.018	3/9/91	0.0176	6/24/91	
	-	44	A	0.75	68 - 508	41.905	12/8/84	0.0175	7/21/88	0.1633	1/5/91	
2 SI-4.7.A.2.g-3/68a	U	V	A	0.75	68 - 550	109.75	12/8/84	0.0175	7/21/88	0.2445	1/5/91	
		-	A	0.75	68 - 523	0.0094	12/8/84	0.0175	7/21/88	0.0165	8/4/90	
L-SI-4.7.A.2.g-3/68b	U	V		browning to the same of	68 - 555	24,757	12/9/84	0.0175	7/21/88	0.0165	8/4/90	
			Α	0.75	69 - 1	0.0551	9/20/85	0.9916	8/21/88	0.5084	9/5/90	
2-SI-4.7 A 2 g-3/69	U	V	A	6	69 - 2	0.0551	9/20/85	3.32.73	W. E. 11 W. S.	3 9454	9/5/90	
			A	6		291.8	9/14/87	0.0169	9/27/90	0.0171	12/5/90	
2-SI-4.7.A.2.g-3/70	U	¥	Α	5	70 - 47	167,73	9/14/87	4.5866	5/17/90	0.0165	8/5/90	
			A	5	70 - 506	51.888	7/22/85	0.0095	6/9/86	0.0167	1/24/91	
2-SI-4.7.A.2.g-3/71a	U		A	3	71 - 2/3		10/28/84	1.856.7	3/2/91	1,316	3/15/91	
2-SI-4.7.A.2.g-3/71b	U	V	Α	10	F1 - 14/580	28.5882	1/22/86	0.0172	3/2/91	0.1216	3/15/91	Lastings accepted by BEIE
			A	0	71 - 14P	0.3926		1,336	10/12/90	0.0178	5/3/91	Leakage accepted by NDE
			A	0	71 - 48	0.0083	3/18/85	0.0225	9/17/88	0.003	1/30/91	
2-SI-4.7.A.2.g-3/71c	U	V	W	0.1	71 - 34	0.0036*	8/26/85	and the second s				
			W	0.1	71 - 147	0.0036*	8/26/85	0.0075	9/17/88	0.003	1/30/91	
2-SI-4.7 A.2 g-3/71d	U	V	W	0.3	71 - 17 Bedy	0.0765	8/27/85	0.0225	1/23/91	0.0036	3/29/91	DECEMBER HAVEED
			W	0	71-17 Packing			0.0036	10/26/88	N/A	N/A	PACKING MODIFIED
			W	0.3	71- 8			0.09	10/26/88	0.09	1/23/91	
2-SI-4.7.A.2.g-3/71e	U		W	0.1	71 - 32/592	0.003	10/28/84	0.0036	9/7/90	0.003	11/26/90	The second resident with the Post
			A	0	71 - 32B+P	0.19802	1/7/86	0.0169	9/7/90	0.017	11/26/90	AF TESTED FROM WITHIN "OF
2-SI-4.7.A.2.g-3/73a	U		A	10	73 - 2/5/81	35.629	5/6/85	9.159	2/3/91	1.3038	5/9/91	
2-SI-4.7.A.2.g-3/73b	U	V	A	20	73 - 23/603	33.517	10/27/84	5.2097	9/21/88	6.5971	1/13/91	
			A	0	73 - 23P	0.0036	3/18/85	0.3313	1/25/91	0.0172	1/30/91	
			Α	0	73 - 238	6.169	1/22/86	0 0176	9/21/88	0.0169	1/13/91	
2-SI-4.7.A.2.g-3/73c	25		W	0.1	73 - 24/609	0.003	10/27/64			0.0036	8/15/90	
			A	0	73 - 248÷P	0.145	1/7/86			0.0167	8/25/90	AF TESTED FROM WITHIN TO
2-SI-4.7.A.2.g-3/73d	U	٧	W	0.8	73 - 26	0.9463	10/17/85	0.4612	11/30/88	0.27	2/25/91	AF TESTED SMULTANEC'S
E Granagarad	- M		W	0.8	73-27	N/A	N/A	0.225	10/27/88	0.09	2/25/91	
2 01 4 2 8 2 6 2/720	U		.W.	0.1	73 - 30	.0096*	8/28/85	0.036	2/25/91	0.0036	3/17/91	AF TESTED SAMULTANEOU
2-SI-4.7.A.2.g-3/73e	0		W	0.1	73 - 559	.0090*	8/28/85			0.0038	2/25/91	AF TESTED SIMULTANEOUS
2014742-20740	U	V	W	1.2	74 - 53	0.0477	12/8/84	0.0225	7/29/58	0.009	11/3/90	
2-SI-4.7-A.2-g-3/74a	0	4	W	1.2	74 - 54	0.27	12/9/84	0.135	5/16/86	0.549	11/3/90	
2-SI-4-7-A-2-g-3/74b	U	v	W	0.6	74 - 57/58	48.56	10/28/84	2.025	10/31/90	0.396	11/5/90	

SURVELLANCE INSTRUCTION	D	V W/A	HEF UR	COMPONENTS	ASFOUNDLA	AF DATE	PUST-MAINT UR	PMDATE	AS-UEFT UH	AL DATE	CLAMMETALS
St. 4.7 & 2 o. 2/7 dc	1	W	90	74 - 80	0,0072	12/9/84	0.0675	8/16/88	0.315	1/2	TESTED SMULTANEOUSLY
		-	9.0	74-61	N/A	N/A	N/A	N/A	0.0225	Ot	
SI-4.7.A.2.g-3/74d	n	W V	1.2	74 - 67	0.2286	11/1/84	0.045	8/1/88	0.2585	11/1/90	
		AA	1.2	74 - 68	0.243	11/2/84	4.05	11/1/90	0.436	11/9/90	
SI 4.7.8.2.9.9/74e	n	M A	9.0	74 - 71/72	0.3555	10/28/84	3.7327	11/4/90	0.576	11/15/90	TECTED CAME TAKETHES V
4.7 A.2 g		+	9.0	74 - 74	0,0036 N/A	6/23/65 Ni.A	54/A	N/A	0.4363	11/1/90	ICSIED SMOCINACOOS.
4 4 5	+	4	0.0	24 47	12113	1/3/85	0.1178	8/21/88	3.6238	10/30/90	
SI47.4293/149	0	K K	200	74 - 48	4.3393	1/13/85	1.473	8/12/88	5.5614	15/10/90	
		. 4	0.75	74 - 661/662	0.0505	1/13/85	0.0178	8/28/88	0.721	6/3	
St. 4.7 A.2 o-3/74h	6	· ×	0.4	37	0.495	10/27/84	0.2051	10/26/88	0.054	8/16/90	
	-	-		74.722 FL	N/A	N/A	N/A	N/A	0.0225	2/22/91	
St 47 A 20-374	2	N A	0.1	74 792	0.0036	11/14/87	0.0144	5/9/88	0.0056	9/8/80	
			0.1		0.0036	11/14/87	0.0225	6/14/88	9600 0	06/8/6	
SI 47 A 2 9 3/74	5	V W	0.1		0.0038	11/15/87	0.0144	4/25/88	0.0036	10/24/90	
	Н		0.1		T	11/15/87	0.0225	4/25/88	0.0036	10/24/90	
St.4.7.A.2.g-3/75a	7	M A	0.6	75 - 25	Ť	6/23/83	0.0700	00/67/00	0.135	08/8/80	
	-		9.0	3	Ť	6/23/83	0.010	3/2/55	0.0225	08/8/8	The second secon
SI 4.7.4.2g 3/75b	n	M A	9.0	75 55	0.1278	2/10/85	32.4	8/10/90	0.198	8/25/90	
	-	78.	2 4 6	- WE	t	3/15/85	0.18	8/2/88	600.0	9/4/90	
0147404375d	2 33	200	2 - 0		H	11/14/87	0.324	8/29/90	600.0	8/29/90	
200	+	M	0.1			11/14/87	0.324	8/29/90	0.0036	8/29/90	
CLA 7 & 2 0. 9/75.a	N 19	M A	0.1	H	0.0036	11/15,87	0.0225	9/5/88	0.0056	8/28/90	
	ŀ	W	0.1		9,008	11/15/87			0.027	8/28/90	
St4.7.A.2.0.3/768	N N	*	0.5	111	0.0094	3/9/85	0.0175	8/16/88	0.52.7	2/6/91	Leakage Accepted by NDE III
		¥	0.5	76 - 50	0.0034	3/8/85	0.0175	8/16/83	0.5543	2/6/91	Leakage Accepted by NDE III
St 4.7 A 2.9 3/76d	U V	ec.	0.5	3.3		7/20/85	0.1645	2/6/91	0.018	2/10/91	
		<	0.5	76 - 56	0.0082	7/20/85	0.2321	2/6/91	0.1344	2/10/91	
SI4.7.A.2.9.3/7°9	V U	45	0.5			7/20/85	0.0175	8/16/83	0.0168	2/6/91	
	-	× .	0.5	76 58	0.0082	7/20/85	0.01/5	8/16/88	0.0168	2/6/91	
SI-4 A 2 g 3/761	2	K 4	0 0			3/10/85	0.0175	8/16/88	0.0168	2/6/91	
St. 4.7. & 3 or 2/75:	10	C 45	2 0			7/20/85	0.0169	5/5/89	0.2389	2/6/91	
74	H	×	9.0		0.0082	7/20/85	0.0169	5/5/89	0.1645	2/6/91	
St47 A 2 0 3/76	A	40	0.5	76 67	0.0082	7/20/85	0.0168	2/6/91	0.0969	3/14/91	
	+	×	5 0	75 - 68	0082	7/20/85	5.0175	98/91/6	0.0168	2/6/91	
St. 4.7 A.2 g. 3/76k	N O	40	CV.	-	1600	1/19/85	0.4283	11/27/90	2.0774	10/18/91	Leakage Accepted by NDE III
		ď	0		0001	3/10/85	0.0171	11/27/90	0.0168		
	-	«	0	***	1000	3/11/85	0.0171	08/17/11		10/18/91	
Si-47.A.2g-3/78	N N	« ·	6	77 28	2.4293	1/13/85	2 0 2 7 3	R/30/80	0.7914	11/30/90	
40 4 6 - 9735	10	< <	n e	77 - 45a	2 1564	113/8	0.0383	12/17/88	0.5858	11/30/90	
31-4. A.C.B.3770	2	ž at	0 80		2.1564	1/13/85	0.4636	12/17/88	1.0866	11/30/90	
CLA7 4 2 n. 2/849	11 V	45	+	1.0	33.987	1/10/85	1.6452	10/14/89	0.0181	2/14/91	AF TESTED SMA'L TANEOUSLY
200	H	K		1.0	33.981	1/10/85	0.0182	10/14/89	0.0181	2/14/91	
St 4 7 A 2 o 3.845	A n	×	4		VE.38.3	1/19/85	0.0180F	2/14/91	0.0173	3/9/91	AF TESTED SMALLTANE OURSEY
	-	40	-	84 - 601	6.5537	1/19/85	0.3927	115	0.0181	2/14/91	
SI 4.7.A.2.0-3/84c	N O	×			0.2126	1,19/85	0.0182	112/8		2/7/91	AF TESTED SMALLT-INEOUSLY
		¥	T		0.2126	1/19/85	0.1977	12/8	0.1634	2/7/91	TESTED SMAULTANEOUS
St.4.7.A.2.o.3/54d	U V	¥	1			1/19/85	1.121	10/14/89	0.0171		AF TESTED SHALL TANEOUSLY
The second secon			_								

Enclosure I Page 28 of 31

URVEILLANCE INSTRUCTION	U	٧	W/A	REF. LR	COMF	ONENTS	1	UNDLR	AF DATE	POST-MAINT LR	PMIDATE	AS-LEFT LR	AL DATE	COMMENTS
2-SI-4.7.A.2.g-3/94a	U	٧	1.		94	501		7.6044	3/9/85	0.0175	8/8/86	0.0173	2/17/91	
			A	1	94	502		2.4747	3/9/65	0.0175	8/8/95	0.6173	2/17/91	
			A	1	94	503		1.6193	3/9/85	0.0175	8/8/88	0.0173	2/17/91	
			A	1	34	504		0.0567	3/9/85	0.611	8/8/88	0.0173	2/17/91	
			Α	3	7.1	505		0.3807	3/9/85	1.0583	2/18/91	0.0178	5/23/91	
2-SI-4.7.A.2.g-3/94b	U	V	A	1		653	- 15	0.0083	3/10/85	1.000	8/2/90	0.0172	2/26/91	

UNIT 2 FORCED OUTAGE TESTING PRIORITY

TABLES

8 844 1 1 2 9 30 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		ники мини их	M M M M M		0 0169 773 773 0 0165 0 0 0165 0 0 0165 0 0 0165 0 0 0155 0 0 0 0171 1 1 1 1 1 1 1 1 1 1 1 1 1 1	17.90	
6 34 7 1 2 9 7 1 2 9 7 1 2 9 7 1 2 9 7 1 2 9 7 1 2 9 7 1 2 9 7 1 2 9 7 1 2 9 7 1 2 9 7 1 2 9 7 1 2 9 7 1 2 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9		мма м ммм м ж	MM MM		三 日 日 田 美 日 三 明 田 田 田 田	11/60 4/90	
5/64 1/ A E G MOD A 0.75 Res Sold 5/64 1/ A E G MOD A 0.75 Res Sold 5/64 1/ A E G MOD A 0.75 Res Sold 5/64 1/ A E G MOD A 1 20 20 5/64 1/ A E G MOD A 1 6 5/10 5/64 1/ A E G MOD A 1 6 5/10 5/64 1/ A E G MOD A 1 6 6/10 5/64 1/ A E G MOD A 1 6 6/10 5/64 1/ A E G MOD A 1 6 6/10 5/64 1/ A E G MOD A 1 6 6/10 5/64 1/ A E G MOD A 1 6 6/10 5/64 1/ A E G MOD A 1 6 6/10 5/64 1/ A E G MOD A 1 6 6/10 5/64 1/ A E G MOD A 1 6 6/10 5/64 1/ A E G MOD A 1 6 6/10 5/64 1/ A E G MOD A 1		нкти мним кх	M M M M		a a a 5 a 5 a a a a a 5	06/80	96 on 10, of 140
\$1.9.1.7 A \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$		ники мини иж	жж жж		*************	06/4	CUT THERE SOA, RESIDENT NOTATIONS
\$\text{5}\text		ничи мини ни	жж		45454444		20.00
\$\$14.7.4.2.9.370 \$\$1.3		няти яння ка	×× ××		· · · · · · · · · · · · · · · · · · ·	9/80	Ã
\$\$\text{\$4,742\tilde{2}		нич и мими ки	жж жж		# 2 # # # # # #	06/6/	8
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\$1.47.42.92.94.a		+	× ×	-	203	26/00	
Sp. 4.7 A.2 gr. 3.74, 6 0 W 0.1 74 892 0.4.7 a.2 m.1746, 9.4 Millar A. 2.6 74 47		,	-		600	04.000	
50.47.45.0.07.50 9.4 Note 2 A 26 74 47		4 3	-		000	04/80	
Cold Tan Con State Morte 2 A 20 74 A7		¥			000	24790	
04 Act 2/40	M 1	*			238	30/80	
A 20 74 48		ж 1		Andrew Comments	614	30/80	
A 0.75 74 - 641,652		×			D. Carlotte	30180	
1.2 74 67	×	×	The second second		0.6290	08/1/	

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TABLE 5, (CONTINUED)

UNIT 2 FORCED OUTAGE TESTING PRIORITY

S.PVELLAN.F INSTRUCTION	Duration	Priority		Reterence LR	Component	Drywell Entry	Draining	PFFICS	MM Support	No Restriction	WS-CELL-CH	AL DATE	
A 40 a 4 a 4 a 4 a 4 a 4 a 4 a 4 a 4 a 4	4.5	-	700		74 74			×			0.4365	11/1/90	
23147 AZ 23741	10	D	t	9 0	74.76			×			0 175	41.1/90	
2 Ga # 7 & S to 3 Che	9.0		M		74 . 60			×			0.315	11/2/90	
2 Table 2 Table 2			M		74.61			ж			9220 0	11/2/80	
2.5.4 7 A.2.0.3/748	9	Skere A	200		74 . 53	м		н			00000	11/3/22	
			*		74 - 54	M		× 2			0.308	11.6.000	
1 24 TA 2 14 STALL	10	15	25		74 5758	1		× 10			0.078	11775.90	
7. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	0.0	16	20		74 - 71/72	1					0.003	11/56/00	Stansing Spulled
あたんかいでいる	04	10	8		71 - 32/592		-		*		2017	11/26/95	Pervisors flor Less Sessions Scotland
Section of the Parket		2 11 12	₹ .	0	71 - 208, 10	30			£ 16		0.1914	11/30/90	Regular Installation of Test Plance
2 24 7 4 2 5	0	Motte 6	< .	2	27 4	. 34	×		K		0.4428	11/30/90	notalistics of Test
THE REAL PROPERTY.	***	4 100	< -	0		м	×		ж		0.5858	11110/90	netaliation of Test
2-3147A.293/70	0	PACSE D	K 4	0 0	77. 154	H	×		×		1.0866	11/30/80	netaliation of Tess
01.4.7 & 0 × 0/E1.4	1	Alreas 1	4	Ł	y In it Present El Pariet					×	0.011	12/11/80	
NA CENTER OF STREET	-	Plotes 9	4		19, 12, 48-97, SCVC Line Beltoses Inflicand				×		9700 0	12/18/95	
SLA 7 A 2 G 9 ALE	01	Notes 2	*		X 12 RHR SDC Une Bellows Subported				×		0.0026	12/16/90	
St. # 7 A 2 0 2/BLs	01	Nove 2	×		X 13A RHF Dach Line Bellows Interant		Annual Control		H		0 0022	12/16/40	The second second second second
81.47 A 2 6 2/81.8	G	Note 2	¥	0.05	X.13A RHR Decn Line Bollows Outboard				×		0 0055	12/18/80	
51-4.7.A.2.c.2/8l.a	64	Nests 2	×	0.05	X 13B RHR Disch Line Belicks intolend		***************************************		¥		0.0376	12/18/90	Section of the latest
8147 A 2 0 2 8ta	04	Note 2	*		X 13B RHP Disch Line SetCivis Quiboard	-			H	-	0 003	12/18/20	The state of the s
St 4 7 A 2 0 2 5 La	7%	Mote 2	×		X.16A CS Pump Discharge Line Selever Intoletul		-	-	×	-	0.0025	12/19/90	
St47.42g: N.a	74	Note 2	×		8		-	-	K 3		2,006.0	12/18/90	
St 47. A.2. g 2. 11. B	114		<		g	+		Section Sections	. 3		C 0000	00/01/04	
St. 47 A 2 g 275.4	2	Hote 2	¥	0.05	X-168 C. Pump Discharge Line Bellows Culboard						0.00313	1/9/01	
147 A 2 2 2/RL#	O.I		×		X MS Line A Ballothe indicard						6.50319	675/84	
847 A 2 p 2/644	04	Note 2	×	0.00	X.7.3 MS Line A Behavis Culticoand				i se		2 001	1/2/81	
147 A 2 9-27b. a	D) (۷.	3	X-8 MIS Drain Britains Provided				×		1003	1/2/91	
147 A 2 g 2 Bt s	4		۷.	Ŧ	Can code	×	×				0.1633	1/6/91	
SE4.7. A.Z. g. 3003			4	100		×	ж				0.2445	1/8/8/1	
0 01 4 7 4 0 a 0/7%	,	**	*	20							176, 4	1/13/91	Respaires Scattoid
51			×	0	73 - 235						0.0-72	1/30/91	Requires Scattoko
			×	0						-	0.0169	1/13/91	Regares Scaffold
SI47.A2.93%	5.4	Aunts 4	×	2.4	3 - 958	×	×				10 s	3/15/83	
			*	2.4		×	K	-	-	-	1.5475	1/15/01	
		The second second			73 . 45	M 2	ĸ			-	0.0008	1/16/01	
4	29	Note 3	ec .	000	X.7 Sheer Lug Flerge 90"	× ×			Ī		0.0004	1/16/91	
9 1	N P	Note 3		S S	N. C. Commercial Comme	36					\$ 0000	18/11/18	
9 4	. 0	Harden 3	*	96	X-7 Shear Lat Plante 315	×					5 0002	1717/91	
el a		Nota 3	4	90	X. ? Shear Lug Plange Of	×					0.0003	1/12/81	The state of the s
1	50	Hote 3	×	90	X-7 Shear Lug Plenge 45"	×					6 0002	CB()	
19	01	Note 2	×	36	X 7B tarS Linus B Balliciums Imbicated		-		×	-	0.0026	1/18/81	
4	O.	Note 2	×	92	X 78 MS La v B Biolinus Culticourti		1		M		0 0031	1/15/6/	The second secon
14	54	Note 2	*	60	X 7C MS Line C Sellows inboard	-			at 1		0.003	17.39(81	The second second second
4	N	Note 2	×	45	X-7C MS Ins C Ballows Outhoard	1	1	-	X.	-	0.0031		
147 A 2 9 2 194 B	C4	Note 2	es.	0 05	X.7D MS Line D Bullows Indoxed	-	-	-	HC 0		0.0037	4.00/81	
10	04	None Z	*	42	X 70 MS Line D Selews Outhoand	+	+				0.00018	1000101	
2	(Na	Note 2	*	90	X 11 HPCI Sector Line Sellows inboard	+	-				6.00142	1/20/04	The second secon
153	70	Note 2	<	45	X-11 HPCI Steam Une delibers Outboard	-	-	-			0	1/20/01	
4	9	12	×		71.59/801 BuP	+	-	1				1/20/01	
	-	The second second	4		79.841642 B+P		Ī				0.38	1/23/81	
St47. A 2 g 3/71d	*	13	¥.		71.18						0.0167	1/24/51	
Si47 A 2 g 3/71a	2	M056 4	W.	-1	2.2 .000						0.0168	1/26/81	

UNIT 2 FORCED OUTAGE TESTING PRIORITY

Notes:

- 1. Electrical penetrations will be tested as the outage schedule permits as filler work.
- 2. Expansion bellows will be tested as the outage schedule permits as filler work after all electrical penetrations are tested.
- 3. Shear lugs are located at the top of the drywell. High temperature and radiation conditions at this location present a significant risk to personnel.
- High coolant and component temperatures may adversely affect test results and personnel safety.
- 5. RCP pump seal water is isolated to perform this test. System fill and venting is required prior to system return to service.
- 6. Requires disassembly of sump pump discharge piping. High dose rates, high contamination levels, and heat stress conditions may be present.

ENCLOSURE 2

SUMMARY OF THE COMMITMENT MADE IN THIS LETTER

Additional LLRT testing will be performed during any forced outage of sufficient duration should one occur prior to the Unit 2, Cycle 6 refueling outage.