

TEXAS UTILITIES GENERATING COMPANY
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. #1 • DALLAS, TEXAS 75201

Log # TXX-4282
File # 916

August 23, 1984

Director, Office of Nuclear Reactor
Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTN: Mr. B. J. Youngblood, Chief
Division of Licensing
Licensing Branch No. 1

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
UNIT 1; DOCKET NO. 50-445
REQUEST FOR PARTIAL EXEMPTION FROM
10 CFR 50 APPENDIX J

Dear Sirs:

Comanche Peak Steam Electric Station Unit 1 Technical Specification 4.6.1.3b(2) (see attachment) requires a containment airlock leakage test be performed prior to establishing Containment Integrity when maintenance has been performed on the lock that could affect airlock sealing capability. This Specification does not entirely comply with the requirement of 10 CFR 50, Appendix J, Section III.D.2.b.ii which requires leakage testing of the air lock following any opening of both doors in an airlock during a period when Containment Integrity is not required.

An exemption to Appendix J is requested based on the following reasons:

- 1) The overall airlock leakage rate will be measured at least once per 6 months regardless of the airlock operating or maintenance history.
- 2) An overall leakage rate will be measured following any maintenance potentially affecting the airlock integrity.
- 3) Opening of both doors of an airlock should not affect the sealing capability any more than opening one door and then the other during a normal entry thru the airlock. Within 72 hours following each entry and once per 72 hours for multiple entries a leakage test will be performed on each door seal as required by Technical Specification 4.6.1.3a and 10 CFR 50, Appendix J, Section III.D.2.b.iii. Any

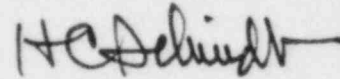
8408270124 840823
PDR ADOCK 05000445
A PDR

13001
1/0

affect on the sealing capability caused by having both doors open simultaneously will be detected by the leakage test of the seals following door closure, thus making a full airlock leakage test unnecessary for the assurance of airlock integrity.

Based on the justification listed above, the applicant requests an exemption to 10 CFR 50, Appendix J, Section III.D.2.b.ii.

Respectfully submitted,



H. C. Schmidt

RAW:tls
Attachment