



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

AUG 27 1984

*Docket File*

Docket No.: 50-445

Mr. M. D. Spence  
President  
Texas Utilities Generating Company  
400 N. Olive Street  
Lock Box 81  
Dallas, Texas 75201

Dear Mr. Spence:

Subject: Request for Additional Information on the Preoperational  
Integrated Leak Rate Test Performed for Comanche Peak Steam  
Electric Station, Unit 1

During its ongoing review at Comanche Peak, the NRC Technical Review Team received an inquiry as to whether two procedural variations used by TUGCO during conduct of the integrated leak rate test (ILRT) were acceptable to the NRC staff. The procedures questioned were as follows:

1. TUGCO conducted the ILRT with three (3) penetrations isolated because they were leaking (Penetrations E-49, E-62 and E-68). After the ILRT was completed, TUGCO inspected these penetrations and determined that the gaskets were improperly installed. Reinstallation of the gaskets mitigated the leakage. A local leak rate test was conducted on each repaired penetration and the results were integrated into the ILRT analysis, and the test results found acceptable.
2. TUGCO committed to conduct the ILRT to the methodology of ANSI N45.4-1972 in the FSAR; however, TUGCO actually used the methodology of ANSI 56.8-1981.

On the basis of its review of the Test Summary Report, submitted by letter H. C. Schmidt to H. R. Denton dated May 6, 1983, the staff confirmed that three electrical penetrations (E-49, E-62 and E-68) were isolated during the ILRT because of excessive leakage. The measured leakage rate (L<sub>m</sub>) at the reduced pressure (P<sub>t</sub>) was 0.02026% per day and the measured leakage rate (L<sub>m</sub>) at the peak pressure (P<sub>a</sub>) was 0.05579% per day. The maximum allowable leakage rate (L<sub>a</sub>) is 0.10% per day. Subsequent to the test, the applicant repaired the three electrical penetrations and performed local leak rate tests. The resulting local leakage rate for the three penetrations was 6 SCCM, or  $4 \times 10^{-8}$  % per day. This leakage is negligibly small compared to the measured values of L<sub>m</sub> and L<sub>m</sub>, and will not affect the integrated leak rate test results. Since only three penetrations are involved, and the impact on

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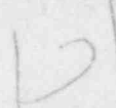
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the integrated leak rate test result is insignificant, the staff concludes that the measured values of Ltm and Lam are acceptable. However, the staff finds that additional information is needed before it can determine the acceptability of the applicant's approach in using the methodology of ANSI 56.8-1981 instead of ANSI N45.4-1972, as committed in the FSAR. The enclosed question is accordingly being transmitted for your response. For subsequent documentation in an FSAR Amendment, your response should be identified as answering Q022.22.

Until your response is received, and found acceptable, we consider this matter to be an outstanding issue which should be added to the list of issues contained in my letter to R. J. Gary dated January 24, 1984, and will be listed in the SER as "Deviation to integrated leak rate test methodology of ANSI N45.4-1972 committed to in the FSAR".

Please advise the Project Manager when we may expect to receive your response to the enclosed question within 5 days after receipt of this letter.


Sincerely,

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

Enclosure:  
As stated

cc: See next page

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COMANCHE PEAK

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Question # 022.22

ENCLOSURE

REQUEST FOR ADDITIONAL INFORMATION  
ON INTEGRATED LEAK RATE TEST (ILRT) FOR  
COMANCHE PEAK, UNIT 1

It is stated in the FSAR that the methodology of ANSI N45.4-1972 will be used to conduct the ILRT. The staff Technical Review Team (TRT) has found that the methodology of ANSI/ANS 56.8-1981, instead of ANSI N45.4-1972, was used in performing the test; ANSI/ANS 56.8-1981, however, has not been endorsed by the staff. In reviewing the ILRT summary report, dated May 6, 1983, we note that the "mass-plot method" of ANSI/ANS 56.8-1981, was used to calculate the containment leakage rate. Although we find this acceptable, the applicant is requested to identify and justify any other differences in applying ANSI/ANS 56.8-1981 in lieu of ANSI N45.4-1972.