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Log # TXX-4386
File # 914.2

December 21, 1984

JOHN W. BECK
MANAGER-LICENSING

Director of Nuclear Reactor Regulation
Attention: Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
RESPONSE TO NRC QUESTION Q022.22

Dear Sir:

Attached please find the response to NRC Question Q022.22 and revised FSAR text. These changes will be part of Amendment 54 to the CPSES FSAR which is scheduled for transmittal in January of 1985.

Should you have any questions in this matter, please contant this office.

Respectfully,

J. W. Beck

BSD/grr
Attachment

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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 ASNI 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.

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The CILRT Procedure (1CP-PT-75-02) was compared with FSAR commitments to conduct the CILRT in accordance with 10CFR50 Appendix J and ANSI N45.4-1972. The results of that review indicate no deviations, other than use of the "mass-plot method" for calculation of containment leakage rate and isolation of the three electrical penetrations during conduct of the test as a result of applying ANSI/ANS 56.8-1981 in lieu of ANSI N45.4-1972. These deviations have been accepted by the staff in the NRC request for additional information letter dated August 23, 1984. FSAR Section 14.2, Table 14.2-2, Sheet 59 of 60 and Section 3.8, Paragraph 3.8.1.7.2 have been revised to include this information.

since the CPSES Containment is not a prototype containment). | 18

3.8.1.7.2 Initial Leakage Rate Tests

Containment leakage testing is in accordance with all the requirements of 10 CFR Part 50, Appendix J, Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors (2/5/73).

A reduced pressure test program is used, as described in 10 CFR Part 50, Appendix J. The reduced pressure test is at 50 percent of the calculated peak Containment internal pressure. For calculated peak Containment internal pressure, see Section 6.2.1.

A preoperational Type A integrated leakage-rate test is performed at the calculated peak Containment internal pressure and also at the reduced pressure. Type B tests of components and Type C tests of Containment isolation valves are performed in accordance with 10 CFR Part 50, Appendix J.

The maximum allowable leakage-rate (La as defined in 10 CFR Part 50, Appendix J), related to the maximum Containment leakage under design basis pressurization accident conditions, is 0.10 percent of the weight of contained air, at the calculated peak Containment internal pressure in a 24-hr period.

For a discussion of the test objectives and the acceptance criteria, see the Technical Specifications for Containment Tests.

Test methods are in accordance with ANSI N45.4-1972, Leakage Rate Testing of Containment Structures for Nuclear Reactors (03/26/73), with the exceptions of isolated penetrations and the use of the mass-plot method per ANSI/ANS 56.8-1981 as stated in Table 14.2-2 (Sheet 59 of 60). | 54 Q022.22

Table 14.2-2 (Sheet 59 of 60)

CONTAINMENT INTEGRATED LEAK RATE TEST
TEST SUMMARY

OBJECTIVE

To verify the primary reactor containment overall integrated leakage rate is within acceptable limits.

PREREQUISITES

1. Fluid system conditions are established as applicable to simulate post accident conditions which extend the boundary of the Containment Building.

2. Containment component and isolation valve leak tests have been satisfactorily performed.

3. All containment isolation valves have been closed by normal actuation methods.

TEST METHODS

1. Perform the containment integrated leak rate test per Appendix J of 10 CFR Part 50.

2. Perform the leakage rate calculation by using the mass-plot methodology as described by ANSI/ANI 56.8-1981.

3. If during the performance of a type A test, excessive leakage occurs through locally testable penetrations or isolation valves, these leakage paths may be isolated and the Type A test continued until completion. The sum of the post repaired local leakage rate values will be added to the UCL per ANSI 56.8-1981.

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ACCEPTANCE CRITERIA

The Containment Integrated Leak Rate Test meets the requirements of Appendix J of 10 CFR Part 50.

Note:

The containment structural integrity test described in FSAR Section 3.8 may be performed concurrently with the Integrated Leak Rate Test.