December 12, 1983

Note to Tim Colburn

SUBJECT: POINT BEACH 1 CONTAINMENT INTEGRATED LEAK RATE TESTING (OELD # 839 746)

Tim, this package appears to propose to allow some containment purge and supply valves to be treated as type "B" valves rather than type "C" valves under Appendix J and this is treated as an administrative change. But this treatment of the valves appears to be inconsistent with Appendix J, the definition of type "B" and the definition of type "C" tests in subsection 2 of Appendix J. That tells you what kind of test you should use under various circumstances. The difference between type "B" and type "C" are not merely administrative changes. It looks like its a substantive change in the characteristics of the valve testing. I think you have to analyze the three standards. You have to use the three standards test and analyze each of the three standards.

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