



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER  
VICE PRESIDENT - NUCLEAR

November 6, 1984

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

KMLNRC 84-192  
Re: Docket No. STN 50-482  
Ref: KMLNRC 84-118 dated 7/20/84 from GLKoester,  
KG&E, to HRDenton, NRC  
Subj: Partial Exemption from Appendix J

Dear Mr. Denton:

The purpose of this letter is to request a partial exemption, pursuant to the provisions of 10 CFR 50.12, from the testing requirements of 10 CFR 50, Appendix J, paragraph III.D.2(b)(ii). The exemption would allow reduced pressure leakage testing of containment air locks following periods when the air locks are open and containment integrity is not required by the Technical Specifications. The reduced pressure testing would facilitate outage work activities with a net result in greater plant availability over the lifetime of the plant. Kansas Gas and Electric Company (KG&E) believes that the exemption would not pose any undue risk to the health and safety of the public.

The current 10 CFR 50, Appendix J, III.D.2(b)(ii) requires that air locks opened during periods when containment integrity is not required by Technical Specifications be tested at the end of such periods at not less than  $P_a$ . Installing strongbacks, performing the tests, and removing the strongbacks requires approximately six hours during which access through the air locks is prohibited. Since air locks are usually open during outages to facilitate equipment and personnel transport into and out of containment, the full pressure testing poses a significant burden and can impede outage work activities.

The reduced pressure test uses a testable seals feature which verifies that the seal leakage is less than  $0.005L_a$  as determined by precision flow measurements when measured for at least 30 seconds at a constant pressure of greater than or equal to 10 psig. The reduced pressure test requires much less time and allows better scheduling of the normal air lock leakage test during periods when the need for access to containment is minimal. The air locks will still be tested at  $P_a$  (as defined in Technical Specification

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Mr. Harold R. Denton  
KMLNRC 84-192

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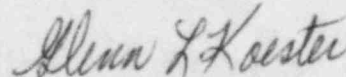
3.6.1.2) at least once every 6 months and prior to establishing containment integrity when maintenance has been performed on an air lock that could affect the lock's sealing capability.

Testing of the air locks at reduced pressure by use of the testable seals feature in conjunction with tests at  $P_a$  every 6 months and following seal maintenance provides adequate assurance of proper seal performance. Therefore, this exemption will not pose any undue risk to the health and safety of the public.

The Standard Technical Specifications for Westinghouse PWRs (NUREG-054, Revision 4) generically recognize this as an area for possible exemption to Appendix J. The proposed Wolf Creek Generating Station Technical Specifications provided in the Reference are consistent with the exemption request.

This request for exemption is for the duration of the license of the Wolf Creek Generating Station, Unit No. 1.

Yours very truly,



Glenn L. Koester  
Vice President - Nuclear

GLK:bb  
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OATH OF AFFIRMATION

STATE OF KANSAS     )  
  ) SS:  
COUNTY OF SEDGWICK )

I, Glenn L. Koester, of lawful age, being duly sworn upon oath, do depose, state and affirm that I am Vice President - Nuclear of Kansas Gas and Electric Company, Wichita, Kansas, that I have signed the foregoing letter of transmittal, know the contents thereof, and that all statements contained therein are true.

KANSAS GAS AND ELECTRIC COMPANY

ATTEST:

E.D. Prothro  
E.D. Prothro, Assistant Secretary

By Glenn L. Koester  
Glenn L. Koester  
Vice President - Nuclear

STATE OF KANSAS     )  
  ) SS:  
COUNTY OF SEDGWICK )

BE IT REMEMBERED that on this 6th day of November, 1984, before me, Evelyn L. Fry, a Notary, personally appeared Glenn L. Koester, Vice President - Nuclear of Kansas Gas and Electric Company, Wichita, Kansas, who is personally known to me and who executed the foregoing instrument, and he duly acknowledged the execution of the same for and on behalf of and as the act and deed of said corporation.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal the date and year above written.



Evelyn L. Fry  
Evelyn L. Fry, Notary

My Commission expires on August 15, 1985.