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Docket No. 50-461

10CFR50.90

Document Control Desk  
Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Clinton Power Station Proposed Amendment of  
Facility Operating License No. NPF-62 (LS-95-014)

Dear Madam or Sir:

Pursuant to 10CFR50.90, Illinois Power (IP) hereby applies for amendment of Facility Operating License No. NPF-62, including Appendix A - Technical Specifications (TS), for Clinton Power Station (CPS). This request consists of proposed changes which are necessary for implementation of 10CFR50, Appendix J - Option B. Specifically, the requested changes are to paragraph 2.D of the Operating License; TS Section 1.1, "Definitions;" TS 3.6.1.1, "Primary Containment;" TS 3.6.1.2, "Primary Containment Air Locks;" TS 3.6.1.3, "Primary Containment Isolation Valves (PCIVs);" and TS Section 5.5, "Programs and Manuals."

A description of the proposed changes and associated justification (including a Basis For No Significant Hazards Consideration) are provided in Attachment 2. A marked-up copy of the affected pages from Facility Operating License No. NPF-62 and the current TS is provided in Attachment 3. A marked-up copy of the affected pages from the current TS Bases is provided in Attachment 4. A schedule for implementation of 10CFR50, Appendix J - Option B, is provided in Attachment 5. Further, an affidavit supporting the facts set forth in this letter and its attachments is provided in Attachment 1. Following NRC approval of this request, IP will revise the CPS TS Bases, in accordance with the TS Bases Control Program of TS 5.5.11, "TS Bases Control Program," to incorporate the changes identified in Attachment 4.

IP intends to implement 10CFR50, Appendix J - Option B, coincident with the start of the sixth refueling outage, which is currently scheduled to begin on October 13, 1996. As such, IP respectfully requests review and approval of this amendment in a manner that would support the proposed implementation date.

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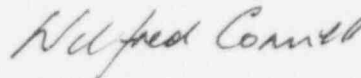
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In addition, it should be noted that after submittal of this amendment request, IP intends to submit requests for relief from selected ASME XI Inservice Testing (IST) requirements where credit is currently taken for the containment integrated leakage rate test (ILRT, or Type A test) to satisfy certain IST requirements at the current test interval for the ILRT. Relief is necessary since adoption of 10CFR50, Appendix J - Option B, would permit test intervals for the ILRT to be extended beyond those specified in the current ASME XI IST program.

IP has reviewed the proposed changes against the criteria of 10CFR51.22 for categorical exclusion from environmental impact considerations. The proposed changes do not involve a significant hazards consideration, or significantly increase the amounts or change the types of effluents that may be released offsite, nor do they significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, IP concludes that the proposed changes meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

Sincerely yours,



Wilfred Connell  
Vice President

JFK/csm

Attachments

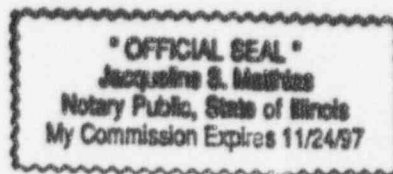
cc: NRC Clinton Licensing Project Manager  
NRC Resident Office, V-690  
Regional Administrator, Region III, USNRC  
Illinois Department of Nuclear Safety

Wilfred Connell, being first duly sworn, deposes and says: That he is Vice President of Illinois Power; that the application for amendment of Facility Operating License NPF-62 has been prepared under his supervision and direction; that he knows the contents thereof, and that to the best of his knowledge and belief said letter and the facts contained therein are true and correct.

Date: This 1<sup>st</sup> day of May 1996.

Signed: Wilfred Connell  
Wilfred Connell

STATE OF ILLINOIS        ) SS.  
                                  ) }  
Dewitt COUNTY         ) }



Subscribed and sworn to before me this 1<sup>st</sup> day of May 1996.

Jacqueline S. Mathias  
(Notary Public)

## Background

In order to ensure offsite doses remain below those calculated in the event of a design basis accident, leakage from the primary containment must be less than or equal to assumed limits. To ensure that primary containment leakage remains within these limits, periodic leakage rate tests are performed. Specifically, 10CFR50.54(o) requires primary reactor containments for water-cooled power reactors to be subject to the leakage rate testing requirements set forth in Appendix J to 10CFR50. The purposes of the test is to assure that (a) leakage through the primary reactor containment and systems and components penetrating primary containment shall not exceed allowable leakage rate values as specified in the Technical Specifications or associated Bases, and that (b) periodic surveillance of reactor containment penetrations and isolation valves is performed so that proper maintenance and repairs are made during the service life of the containment, including systems and components penetrating primary containment.

In 1984, the Nuclear Regulatory Commission (NRC) staff initiated a program to make regulatory requirements more efficient by eliminating those with marginal impact on safety. The NRC's initiative to eliminate requirements marginal to safety recognized both the dynamic nature of the regulatory process and that the importance and safety contribution of some existing regulatory requirements may not have been accurately predicted when adopted or may have diminished with time. Where possible, the NRC pursued initiatives to use a performance-oriented and risk-based regulatory approach in which safety standards are established based on risk, regulatory requirements are expressed in terms of meeting a performance standard, and regulated entities are provided flexibility to adopt cost-effective methods for complying with the performance-based safety standard. This policy and the availability of new technical information and methods justified a review and modification of existing requirements. One area identified as having potential for improvement was the highly prescriptive requirements contained in 10CFR50, Appendix J. As a result, the NRC amended its regulations to provide a performance-based option, known as "Option B," for leakage-rate testing of primary containments of light-water-cooled nuclear power plants. This option has been made available for voluntary adoption by licensees in lieu of compliance with the prescriptive requirements originally imposed by 10CFR50, Appendix J, which remain codified as "Option A." The new option allows test intervals to be based on system and component performance and provides licensees greater flexibility for cost-effective implementation of methods to achieve regulatory safety objectives.

### 10CFR50, Appendix J Requirements, Option A

The "Option A" portion of Appendix J to 10CFR50, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," became effective on March 16, 1973. The regulatory safety objective of reactor containment design is stated in

10CFR50, Appendix A, "General Design Criteria for Nuclear Power Plants," Criterion No. 16, "Containment Design." General Design Criterion No. 16 mandates "an essentially leak-tight barrier against the uncontrolled release of radioactivity to the environment . . ." for postulated accidents. Both options of Appendix J to 10CFR50 implement, in part, General Design Criterion No. 16 and specify primary containment leakage-testing requirements, including the types of tests required.

For each type of test required, Appendix J - Option A specifies how the tests should be conducted, the frequency of testing, and reporting requirements. Appendix J - Option A requires the following types of primary containment leak tests: (1) Measurement of the primary containment integrated leakage rate (Type A tests, often referred to as ILRTs); (2) Measurement of the leakage rate across each pressure-containing or leakage-limiting boundary for various primary reactor containment penetrations (Type B tests); and (3) Measurement of the primary containment isolation valves leakage rates (Type C tests). Type B and C tests are referred to as local leakage-rate tests (LLRTs).

#### 10CFR50, Appendix J Requirements, Option B

Option B to Appendix J of 10CFR50 also requires Type A, B, and C testing to be completed as a means of demonstrating primary containment system integrity. The performance criteria used under this option are those performance standards against which test results are to be compared for establishing the acceptability of the primary containment system as a leakage-limiting boundary. NUREG-1493, "Performance-Based Containment Leak-Test Program," provides a technical basis for the NRC's rulemaking to revise primary containment leakage testing requirements for nuclear power reactors in 10CFR50, Appendix J. Regarding Type A testing, NUREG-1493 found that the effect of primary containment leakage on overall accident risk is minimal since risk is dominated by accident sequences that result in failure or bypass of primary containment. Industry-wide, ILRTs have only found a small fraction of the leaks that exceed current acceptance criteria. Likewise, NUREG-1493 found that while Type B and C tests can identify the vast majority (greater than ninety-five percent) of all leakage paths, performance-based alternatives to current local leakage-testing requirements are feasible without significant risk impacts.

The proposed change to a performance-based leak rate test program does not involve a change to the plant design or operation. Consequently, there will not be any changes to plant hardware resulting from the adoption of 10CFR50, Appendix J - Option B. This change primarily involves a reduction in the frequency of performing Type A, B, and C tests, as determined by the test performance history of the primary containment or systems and components penetrating the primary containment. Except for the method of defining the test frequency, the methods of performing the actual tests are not changed. The Type

A, B, and C tests will continue to be done at full pressure ( $P_a$ ) or greater. NUREG-1493 has determined that under several different accident scenarios, the increased risk of radioactivity release from primary containment is negligible with the implementation of these proposed changes.

#### Implementation Process

If a licensee desires to perform primary containment leakage-rate testing according to Option B, it must submit proposed Technical Specification (TS) changes that would eliminate those TS which prescriptively implement the original rule, and propose new TS referencing the NRC regulatory guide for implementing an acceptable performance-based leakage-test program, i.e., Option B. Specific guidance concerning a performance-based leakage-test program, acceptable leakage-rate test methods, procedures, and analyses that may be used to implement these requirements and criteria are provided in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program."

This TS amendment request is being submitted to the NRC for approval to adopt 10CFR50, Appendix J, Option B. Following NRC approval of this proposed TS change, the Updated Safety Analysis Report (USAR) and appropriate plant procedures will be revised to incorporate the requirements associated with this TS change. As noted previously, a schedule for implementation of Option B at CPS is provided in Attachment 5.

#### Description of Proposed Changes

Consistent with the NRC's TS model enclosed in the letter from C. I. Grimes (NRC) to D. J. Modeen (NEI), dated 11/2/95, and in accordance with 10CFR50.90, Illinois Power (IP) proposes the following changes to the CPS TS:

1. Facility Operating License No. NPF-62, paragraph 2.D, is being revised by deleting references to certain exemptions to 10CFR50, Appendix J, that are no longer applicable.
2. TS Section 1.1, "Definitions," is being revised by deleting the definition for  $L_a$ .
3. LCO 3.6.1.1, "Primary Containment," is being revised by modifying the text associated with the SURVEILLANCE and FREQUENCY sections of Surveillance Requirement (SR) 3.6.1.1.1 and SR 3.6.1.1.2 to remove references to 10CFR50, Appendix J, as applicable, and replace them with references to the Primary Containment Leakage Rate Testing Program described in the proposed new TS 5.5.13, "Primary Containment Leakage Rate Testing Program." Additionally, the Note in the FREQUENCY section of the affected SRs referring to SR 3.0.2 is being deleted.



4. LCO 3.6.1.2, "Primary Containment Air Locks," is being revised by modifying the text associated with the SURVEILLANCE and FREQUENCY sections of SR 3.6.1.2.1 to remove references to 10CFR50, Appendix J, as applicable, and replace them with references to the Primary Containment Leakage Rate Program described in the proposed new TS 5.5.13. Additionally, the Note in the FREQUENCY section of the affected SR referring to SR 3.0.2 is being deleted.
5. LCO 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)," is being revised by modifying the text associated with the FREQUENCY sections of SR 3.6.1.3.5, SR 3.6.1.3.8, SR 3.6.1.3.9, and SR 3.6.1.3.10 to remove references to 10CFR50, Appendix J, as applicable, and replace them with references to the Primary Containment Leakage Rate Testing Program described in the proposed new TS 5.5.13. Additionally, the Note in the FREQUENCY section of the affected SRs referring to SR 3.0.2 is being deleted. The change to SR 3.6.1.3.10 also revises the SURVEILLANCE section of the SR to delete the specified leakage limit for hydrostatically tested lines that penetrate the primary containment as the limit itself will be identified in the associated TS Bases. (The SR will continue to require that the combined leakage rate is within limits.)
6. TS 5.5.13, "Primary Containment Leakage Rate Testing Program," is being added to TS Section 5.5, "Programs and Manuals."

The proposed TS changes are reflected on a marked-up copy of the affected pages from Facility Operating License NPF-62 and the CPS TS contained in Attachment 3. In addition, changes to the CPS TS Bases, consistent with the TS changes proposed in the items above, have been provided in Attachment 4.

#### Justification for Proposed Changes

The adoption of 10CFR50, Appendix J - Option B, requires the establishment of a program to implement the testing of the primary containment as required by 10CFR50.54(o). At CPS this program will be in accordance with the guidelines contained in Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995. RG 1.163 endorsed, subject to certain additional requirements, NEI 94-01, Revision 0, dated July 26, 1995, "Industry Guideline for Implementing Performance Based Option of 10CFR50 Appendix J," as providing methods acceptable to the NRC staff for complying with the provisions of 10CFR50, Appendix J - Option B. In developing the Option B program, Illinois Power will adopt the methods presented in NEI 94-01, including the errata sheet published by NEI which corrects inaccurate wording on pages 9, 11, and 12 of NEI 94-01, Revision 0. Additionally, Bechtel Topical Report BN-TOP-1, which has been previously approved for use at CPS for the performance of

Type A tests (but which is not specifically addressed in NEI 94-01), will continue to be an acceptable option for performance of Type A tests under the new Primary Containment Leakage Rate Testing Program.

#### Type A Testing

The risk resulting from the proposed changes is characterized as follows, based primarily on the results contained in NUREG-1493 ("Performance Based Containment Leakage Test Program"). NUREG-1493 found that the effect of primary containment leakage on overall accident risk is minimal since risk is dominated by accident sequences that result in failure or bypass of primary containment. Industry wide ILRTs have only found a small fraction of the leaks that exceed current acceptance criteria. Only three percent of all leaks are detectable only by ILRTs, and therefore, by extending the Type A testing intervals, only three percent of all leaks have a potential for remaining undetected for extended periods of time. In addition, when leakage has been detected by ILRTs, the leakage rate has been only marginally above existing requirements. NUREG-1493 found that these observations, together with the insensitivity of reactor accident risk to the primary containment leakage rate, show that increasing the Type A leakage test intervals would have a minimal impact on public risk.

NUREG-1493, "Performance-Based Containment Leak-Test Program," provides the technical basis for the NRC's rulemaking to revise containment leakage testing requirements for nuclear power reactors in 10CFR50, Appendix J. Section 10.1.2 of NUREG-1493, "Summary of Technical Findings, Leakage-Testing Intervals," states the following:

1. Reducing the frequency of Type A tests (ILRTs) from the current three per 10 years to one per 20 years was found to lead to an imperceptible increase in risk. The estimated increase in risk is very small because ILRTs identify only a few potential containment leakage paths that cannot be identified by Type B or C testing, and the leaks found by Type A tests have been only marginally above existing requirements.
2. Given the insensitivity of risk to containment leakage rate and the small fraction of leakage paths detected solely by Type A testing, increasing the interval between ILRTs is possible with minimal impact on public risk.

#### Type B and C Testing

NUREG-1493 also found that while Type B and C tests can identify the vast majority (greater than ninety five percent) of all leakage paths, performance-based alternatives to current local leakage-testing requirements are feasible without significant risk impacts. The risk model used in NUREG-1493 suggests that the number of components tested



could be reduced by about sixty percent with less than a three-fold increase in the incremental risk due to primary containment leakage. Since, under existing requirements, leakage contributes less than 0.1 percent of overall accident risk, the overall impact is very small. In addition, the NRC's Final Regulatory Impact Analysis concluded that while the extended testing intervals for Type B and C tests led to minor increases in potential offsite dose consequences, the beneficial expected decrease in onsite (LLRT and ILRT worker) dose exceeds (by at least an order of magnitude) the potential off-site dose consequences.

Operating License Change Justification (Regarding Exemptions from 10CFR50, Appendix J)

Paragraph 2.D of the CPS Operating License currently lists four permanent exemptions from the requirements of 10CFR50, Appendix J, based on the original version (Option A) of Appendix J. Part of the Option B adoption process requires an examination of the differences between the new program and the original version of Appendix J regarding the continued relevance of existing exemptions. IP has determined that revisions of the 10CFR50, Appendix J, exemptions are appropriate. The proposed disposition for each of these four exemptions, including justification, is as follows:

1. For the exemption to paragraph III.D.2.(b)(ii) of the original version of Appendix J to permit substituting the air lock door seal leakage for the entire primary containment air lock test, IP proposes deleting this exemption. Option B provides plenary guidance for the establishment of appropriate testing methodologies and frequencies for primary containment air locks and therefore continuance of this exemption constitutes an unnecessary redundancy.
2. For the exemption to paragraph III.C.3 of the original version of Appendix J to exempt MSIV leakage from inclusion in the combined Type B and C test total leakage, IP proposes to continue this exemption, except that revision is required to clarify that the exemption will now be to the appropriate paragraph of Option B to Appendix J, in lieu of the original paragraph which is contained in Option A. This exemption is still appropriate since the TS still contain a separate leakage limit for the MSIVs. The testing methods and procedures are not being modified by this editorial change to the exemption. Since there have been no modifications to the manner in which MSIV leakage is accounted for and treated in the site radiological analysis, continuing to exclude MSIV leakage from the total leakage obtained by summation of Type B and C local leak rate tests remains appropriate and warrants continuance of this exemption.
3. One of the remaining exemptions pertains to valve 1E51-F374. This exemption permits the packing and body-to-bonnet leakage to be excluded from the local leak rate test boundary, and allows instead the valve to be subjected to a soap solution test during each ILRT. The NRC staff's evaluation of this exemption is provided

in the SER supporting Amendment No. 62 to the CPS Operating License, NPF-62. The exemption for valve 1E51-F374 (including the provision for soap-solution testing the valve during each ILRT) was established when the maximum ILRT test interval was approximately every 3-1/3 years. The adoption of Option B will allow the maximum ILRT test interval to be increased to ten years, and therefore the legitimacy of extending the testing of 1E51-F374 was re-examined.

This valve is located in a nominal 3-inch line and is currently exercised each refueling outage solely for the performance of the Type C test for this containment penetration's associated isolation valves. This line normally contains air at containment pressure and temperature. As a result, the valve packing and body-to-bonnet seal are not subjected to degradation due to large thermal or hydraulic transients. Given the mild environment in which the valve serves, and the infrequent operation of the valve, no significant reduction in its ability to function as a successful containment barrier is expected to occur, even with the extension of the ILRT testing interval. IP has determined, therefore, that extending the testing interval for 1E51-F374 is acceptable, and that continuing the exemption is justified.

4. The exemption pertaining to the requirement of paragraph III.D.1.(a), to conduct the third Type A test during the last outage within the 10-year inservice inspection interval, is no longer required. The Option B program completely defines appropriate methodologies and frequencies for performance of Type A tests. Removal of this exemption is justified since the adoption of Option B will encompass the purpose and intent of this exemption.

#### Technical Specification Change Justification

As part of adopting 10CFR50, Appendix J - Option B, several portions of the CPS TS require revision. TS Section 1.1, "Definitions," is being revised by deleting the definition for  $L_a$  since it is duplicated in the program description contained in the proposed new TS 5.5.13, "Primary Containment Leakage Rate Testing Program." Relocating the definition of  $L_a$  to the new TS allows the description of the new program to be more complete while avoiding the unnecessary redundancy associated with leaving the definition in TS Section 1.1, "Definitions."

LCO 3.6.1.1, "Primary Containment," is being revised by modifying the text associated with the SURVEILLANCE and FREQUENCY sections of SR 3.6.1.1.1 and SR 3.6.1.1.2 to remove references to 10CFR50, Appendix J, as applicable, and to replace them with references to the Primary Containment Leakage Rate Testing Program described in the proposed new TS 5.5.13. The intent of the new TS 5.5.13 is to present the Primary Containment Leakage Rate Testing Program in a separate TS within the Administrative

Controls section of the TS (TS 5.5.13) (similar to what was done under the Improved Technical Specifications for other test programs like the Inservice Testing Program, Diesel Fuel Oil Testing Program, etc.) and refer to that program description where it is appropriate to do so. As a result of this change, the Note in the FREQUENCY section of SR 3.6.1.1.1 and SR 3.6.1.1.2 referring to SR 3.0.2 is also being deleted since the proposed new TS 5.5.13 contains the appropriate restrictions on test interval extensions.

Additionally, LCO 3.6.1.2, "Primary Containment Air Locks," is being revised by modifying the text associated with the SURVEILLANCE and FREQUENCY sections of SR 3.6.1.2.1 to remove references to 10CFR50, Appendix J, and replace them with references to the Primary Containment Leakage Rate Testing Program described in the proposed new TS 5.5.13. As stated above, the Note in the FREQUENCY section of SR 3.6.1.2.1 referring to SR 3.0.2 is being deleted since the proposed new TS 5.5.13 contains the appropriate restrictions on test interval extensions.

Similarly, LCO 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)," is being revised by modifying the text associated with the SURVEILLANCE and FREQUENCY sections of SR 3.6.1.3.5, SR 3.6.1.3.8, SR 3.6.1.3.9, and SR 3.6.1.3.10 to remove references to 10CFR50, Appendix J, as applicable, and replace them with references to the Primary Containment Leakage Rate Testing Program described in the proposed new TS 5.5.13. Likewise, the Note in the FREQUENCY section of the affected SRs referring to SR 3.0.2 is being deleted since the proposed new TS 5.5.13 contains the appropriate restrictions on test interval extensions.

Regarding the addition of TS 5.5.13, "Primary Containment Leakage Rate Testing Program," to TS Section 5.5, "Programs and Manuals," the intent is to identify an overall program to control IP adherence to 10CFR50, Appendix J - Option B. This TS identifies a commitment to conform to RG 1.163, (and by reference, NEI 94-01, Revision 0). RG 1.163 endorses the methodologies presented in NEI 94-01, Revision 0, for establishing a 10CFR50, Appendix J - Option B program. Subscribing to the directives of RG 1.163 provides justification for adoption of a performance-based containment leakage-rate testing program that has been demonstrated and technically justified as described in NUREG-1493. Additionally, the NRC staff has previously approved the use of Bechtel Topical Report BN-TOP-1 at CPS and therefore it will continue to be an acceptable option for performance of Type A tests at CPS under the new Primary Containment Leakage Rate Testing Program.

#### Basis For No Significant Hazards Consideration

According to 10CFR50.92, a proposed change to the operating license (Technical Specifications) involves no significant hazards consideration if operation of the facility in accordance with the proposed change would not: (1) involve a significant increase in the

probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. The proposed changes are evaluated against each of these criteria below.

- (1) The proposed change implements new Option B of 10CFR50 Appendix J for performance-based primary containment leakage testing. The proposed change does not involve a change to the plant design or operation. As a result, the proposed change does not affect any parameters or conditions that contribute to the initiation of any accidents previously evaluated. Thus, the proposed change cannot increase the probability of any accident previously evaluated.

The proposed change potentially affects the leak-tight integrity of the primary containment structure which is designed to mitigate the consequences of a loss-of-coolant accident (LOCA) by limiting the release of fission products contained in the post-LOCA primary containment atmosphere. Functional integrity of the primary containment must be maintained during and following the peak transient pressures and temperatures that may result from a LOCA. Because the proposed change does not alter the plant design, including the primary containment and primary containment penetrations, and because it only affects the frequency of measuring Type A, B, and C leakage without changing the acceptance criteria for the Type A, B, and C leakage rate tests, the proposed change does not directly result in an increase in primary containment leakage. However, decreasing the test frequency can increase the probability that an increase in primary containment leakage could go undetected for an extended period of time. To minimize that probability, test intervals will be established based on the performance history of components being tested.

NUREG-1493, "Performance-Based Containment Leak-Test Program," provides the technical basis for the NRC's rulemaking to revise primary containment leakage testing requirements for nuclear power reactors in 10CFR50, Appendix J. NUREG-1493 documents the NRC's determination that the effect of primary containment leakage on overall accident risk is minimal since risk is dominated by accident sequences that result in failure or bypass of primary containment. NUREG-1493 also documents that increasing the Type A leakage test intervals would have a minimal impact on public risk, and that Type B and C tests can identify the vast majority (greater than ninety five percent) of all leakage paths. Therefore, performance-based alternatives to current local leakage-testing requirements are feasible without significant risk impacts.

Based on the above, IP has concluded that the proposed change will not result in a significant increase in the probability or consequences of any accident previously evaluated.



- (2) The proposed change does not involve a change to the plant design or operation. As a result, the proposed change does not affect any of the parameters or conditions that could contribute to initiation of any accidents. This change involves the reduction of Type A, B, and C test frequency. Except for the method of defining the test frequency, the methods for performing the actual tests are not changed. No new accident modes are created by extending the testing intervals. No safety-related equipment or safety functions are altered as a result of this change. Thus, extending the test frequency has no influence on, nor does it contribute to the possibility of a new or different kind of accident or malfunction from those previously analyzed.

Based on the above, IP has concluded that the proposed change will not create the possibility of a new or different kind of accident not previously evaluated.

- (3) The request does not involve a significant reduction in a margin to safety. The proposed change only affects the frequency of the Type A, B, and C testing. Except for the method of defining the test frequency, the methods for performing the actual tests are not changed. However, the proposed change can increase the probability that an increase in primary containment leakage could go undetected for an extended period of time. NUREG-1493 has determined that under several different accident scenarios, the increased risk of radioactivity release from primary containment is negligible with the implementation of these proposed changes.

The margin of safety that has the potential of being impacted by the proposed change involves the offsite dose consequences of postulated accidents which are directly related to the rate of primary containment leakage. The primary containment isolation system is designed to limit leakage to  $L_a$ , which is defined by the CPS Technical Specifications to be 0.65% of primary containment air weight per day at the calculated peak containment internal pressure for the design basis loss of coolant accident ( $P_a$ ). The limitation on the rate of primary containment leakage is designed to ensure that the total leakage volume will not exceed the value assumed in the accident analyses at the peak accident pressure ( $P_a$ ). The margin of safety for the offsite dose consequences of postulated accidents directly related to the primary containment leakage rate is maintained by continuing to meet the  $1.0 L_a$  acceptance criteria. The  $L_a$  value is not being modified by this proposed change.

Except for the method of defining the test frequency, no change in the method of testing is being proposed. The Type A, B, and C tests will continue to be done at full pressure ( $P_a$ ) or greater. Other programs are in place to ensure that proper maintenance and repairs are performed during the service life of the primary containment and systems and components penetrating the primary containment.



As a result, IP has concluded that the proposed change will not result in a significant reduction in a margin of safety.

Based upon the foregoing, IP concludes that this proposed change does not involve a significant hazards consideration.