ATTACHMENT B

Annotated and Clean Copies of
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LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT

3.10 CONTAINMENT STRUCTURAL INTEGRITY (per unit)

OBJECTIVE:

To insure that the containment structure meets its design requirements throughout plant life.

SPECIFICATION:

1. Containment Leakage Rate Testing
   A. Containment Leakage Rate shall be limited to:
      1. An overall integrated leakage rate ~~of~~ less than or equal to that specified by the Containment Leakage Rate Testing Program.

         ~~a. Less than or equal to L_a, 0.10 percent by weight of the containment air per 24 hours at P_a (47 psig), or~~

         ~~b. Less than or equal to L_t, where L_t is as computed in 10CFR 50 Appendix J and approved exemptions, is the maximum allowable leakage rate at pressure P_t (25 psig)~~

      2.* A combined leakage rate ~~of~~ less than or equal to that specified by the Containment Leakage Rate Testing Program ~~0.60 L_a,~~ for all penetrations and valves subject to Type B and C tests, when pressurized to P_a.

APPLICABILITY: Modes 1, 2, 3, 4 and 7

~~*Refer to note on page 214.~~

4.10 CONTAINMENT STRUCTURAL INTEGRITY (per unit)

OBJECTIVE:

To establish the testing requirements to assure containment structural integrity.

1. Containment Leakage Rate Testing
   A. Surveillance and testing of the containment shall be performed as follows:
      1. The containment Type A leakage rate shall be determined in accordance with the Containment Leakage Rate Testing Program. ~~conformance with 10CFR50 Appendix J and approved exemptions.~~

         ~~a. The leakage rate test shall be performed at or above the design basis accident pressure P_a (47 psig), or at or above the reduced pressure P_t (25 psig).~~

         ~~b. Deleted~~

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT

3.10.1.A (Continued)

ACTION:

* With either (a) the measured overall integrated containment leakage rate ~~exceeding 0.75 L_a or 0.75 L_t, as applicable~~, or (b) ~~with~~ the measured combined leakage rate for all penetrations and valves subject to Type B and C tests, exceeding that specified by the Containment Leakage Rate Testing Program, ~~exceeding 0.60 L_a~~ restore the applicable ~~overall integrated~~ leakage rate to less than or equal to that specified by the Containment Leakage Rate Testing Program ~~0.75 L_a or less than or equal to 0.75 L_t, as applicable, and the combined leakage rate for all penetrations subject to Type B and C tests to less than or equal to 0.6 L_a~~ prior to entering MODE 4.

~~*Refer to note on page 214.~~

~~4.10.1.A.1. c. The maximum allowable leakage rate L_a or L_t, as applicable, shall be computed in accordance with the appropriate paragraphs of 10CFR50 Appendix J and approved exemptions.~~

4.10.1.A.2.* Type B and C tests (except air lock tests) shall be performed in accordance with that specified by the Containment Leakage Rate Testing Program. ~~at P_a or above in accordance with the provisions of the appropriate Section of 10CFR50 Appendix J and approved exemptions.~~

3. Air locks shall be tested and demonstrated OPERABLE per Surveillance Requirement 4.10.2.

4.* Type A, B, and C leakage rate tests shall be considered to be satisfactory if the acceptance criteria delineated by the Containment Leakage Rate Testing Program are met. ~~10CFR50 Appendix J and approved exemptions are met.~~

5. Leakage from containment isolation valves sealed by the Isolation Valve Seal Water system may be excluded from the combined Type B and C leakage rate.

~~*Refer to note on page 214.~~

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENT
3.10.1.A (Continued)	4.10.1.A. 6.* The retest schedules for Type A, B, and C tests shall be in accordance with the Containment Leakage Rate Testing Program. ~~appropriate Section of 10CFR50 Appendix J and approved exemptions.~~ 7. Inspection and reporting of tests shall be in accordance with the Containment Leakage Rate Testing Program. ~~appropriate Section of 10CFR50 Appendix J and approved exemptions.~~

~~*The following exception applies:~~

~~1) Prior to entering Mode 5 for refueling outage Z1R14, the Type C leak rate testing requirements of this specification are not applicable to Unit 1 valve 1MOV-CC685.~~

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
3.10.2 Containment Air Locks A. Each containment air lock shall be OPERABLE with: 1. Both doors closed except when the air lock is being used for normal entry and exit through the containment, then at least one air lock door shall be closed, and 2.* The air lock leakage rate shall be less than or equal to that specified by the Containment Leakage Rate Testing Program. ~~, when combined with other Type B and C test results, shall be less than or equal to 0.60 L_a at 47 psig (P_a).~~	4.10.2. Containment Air Locks A. Each air lock shall be demonstrated OPERABLE: Verify that the overall air lock leakage rate, and the leakage rate for each door, are less than or equal to that specified by the Containment Leakage Rate Testing Program. Verifications shall be conducted at the frequency specified by the Containment Leakage Rate Testing Program. ~~1. Within 72 hours following each opening (except when the air lock is being used for multiple entries, then at least once per 72 hours);~~ ~~a. Verify that the leakage rate from the air lock door seals is less than or equal to 1.0 SCFH at a test pressure (P_π) of greater than or equal to 2.5 psig; or verify that the leakage rate from the air lock door seals is less than or equal to 4.75 SCFH at a test pressure (P_τ) of greater than or equal to 10.0 psig.~~ ~~b. If the air lock door seal test identifies a leakage rate greater than 1.0 SCFH at a test pressure (P_π) of greater than or equal to 2.5 psig or 4.75 SCFH at a test pressure (P_τ) of greater than or equal to 10.0 psig, then an overall air lock leakage test shall be performed at a pressure (P_a) of 47 psig or greater. The acceptance criteria shall be as stated in 3.10.2.A.2.~~
APPLICABILITY: Modes 1, 2, 3, 4 and 7 ACTION: a.) With one containment air lock door inoperable: 1. Maintain at least the OPERABLE air lock door closed and either restore the inoperable air lock door to OPERABLE status within 24 hours or lock the OPERABLE air lock door closed. 2. Operation may continue until performance of the next required overall air lock leakage test provided that the OPERABLE air lock door is verified locked closed at least once per 31 days, 3. Otherwise be in at least MODE 3 within the next 6 hours and MODE 5 within the following 30 hours. ~~* Refer to note on page 214.~~	

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
3.10.2 (Continued) 4. The provisions of Technical Specification 3.0.4 are not applicable. b.) With the containment air lock inoperable, except as a result of an inoperable air lock door, maintain at least one air lock door closed; restore the inoperable air lock to OPERABLE status within 24 hours or be in at least MODE 3 within the next 6 hours and in MODE 5 within the following 30 hours.	~~4.10.2.A (Continued)~~ ~~2. By conducting overall air lock leakage tests at a pressure (P_a) of 47 psig or greater and verifying the overall air lock leakage is within the limit:~~ ~~a. At 6 month intervals~~ ~~b. Prior to entering Mode 4; if in Mode 5 greater than or equal to 7 days and containment integrity has been broken (both doors open).~~ ~~3.~~ At least once per 6 months by verifying that only one door in each air lock can be opened at a time.

6.10 Containment Leakage Rate Testing Program

1. A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995, with the following exceptions:

   a. Section 9.2.3 of NEI 94-01, Revision 0, is modified to permit the elapsed time between the first and last tests in a series of consecutive satisfactory Type A tests to be 18 months.

   b. Section 10.2.1 of NEI 94-01, Revision 0, is not applicable to Unit 1 penetration P-16. This exception for penetration P-16 shall expire at the completion of Unit 1 outage Z1R15.

2. The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 46.79 psig. The containment design pressure is 47 psig.

3. The maximum allowable containment leakage rate, L_a, at P_a, shall be $\leq$ 0.1% of containment air weight per day.

4. Leakage rate acceptance criteria are:

   a. Containment leakage rate acceptance criterion is $\leq 1.0\ L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $< 0.60\ L_a$ for the Type B and C tests and $< 0.75\ L_a$ for Type A tests;

   b. Air lock testing acceptance criteria are:

      1) Overall air lock leakage is $\leq 0.6\ L_a$ when combined with all Type B and C test results at a test pressure of $\geq P_a$.

      2) For each door, leakage rate is $\leq$ 1.0 SCFH when tested at $\geq$ 2.5 psig and $<$ 10 psig, or $\leq$ 4.75 SCFH when tested at $\geq$ 10 psig.

5. The provisions of Surveillance Requirement 4.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

6. The provisions of Surveillance Requirement 4.0.3 are applicable to the Containment Leakage Rate Testing Program.

ATTACHMENT B

Clean Copy of Revised
Technical Specifications

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
3.10 CONTAINMENT STRUCTURAL INTEGRITY (per unit)	4.10 CONTAINMENT STRUCTURAL INTEGRITY (per unit)
OBJECTIVE:	OBJECTIVE:
To insure that the containment structure meets its design requirements throughout plant life.	To establish the testing requirements to assure containment structural integrity.
SPECIFICATION:	1. Containment Leakage Rate Testing
1. Containment Leakage Rate Testing A. Containment Leakage Rate shall be limited to: 1. An overall integrated leakage rate less than or equal to that specified by the Containment Leakage Rate Testing Program. 2. A combined leakage rate less than or equal to that specified by the Containment Leakage Rate Testing Program for all penetrations and valves subject to Type B and C tests, when pressurized to P_a.	A. Surveillance and testing of the containment shall be performed as follows: 1. The containment Type A leakage rate shall be determined in accordance with the Containment Leakage Rate Testing Program.
APPLICABILITY: Modes 1, 2, 3, 4 and 7	

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
3.10.1.A (Continued) ACTION: With either (a) the measured overall integrated containment leakage rate, or (b) the measured combined leakage rate for all penetrations and valves subject to Type B and C tests, exceeding that specified by the Containment Leakage Rate Testing Program, restore the applicable leakage rate to less than or equal to that specified by the Containment Leakage Rate Testing Program prior to entering MODE 4.	4.10.1.A.2. Type B and C tests (except air lock tests) shall be performed in accordance with that specified by the Containment Leakage Rate Testing Program. 3. Air locks shall be tested and demonstrated OPERABLE per Surveillance Requirement 4.10.2. 4. Type A, B, and C leakage rate tests shall be considered to be satisfactory if the acceptance criteria delineated by the Containment Leakage Rate Testing Program are met. 5. Leakage from containment isolation valves sealed by the Isolation Valve Seal Water system may be excluded from the combined Type B and C leakage rate.

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENT
3.10.1.A (Continued)	4.10.1.A. 6. The retest schedules for Type A, B, and C tests shall be in accordance with the Containment Leakage Rate Testing Program. 7. Inspection and reporting of tests shall be in accordance with the Containment Leakage Rate Testing Program.

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
3.10.2 Containment Air Locks A. Each containment air lock shall be OPERABLE with: 1. Both doors closed except when the air lock is being used for normal entry and exit through the containment, then at least one air lock door shall be closed, and 2. The air lock leakage rate shall be less than or equal to that specified by the Containment Leakage Rate Testing Program. APPLICABILITY: Modes 1, 2, 3, 4 and 7 ACTION: a.) With one containment air lock door inoperable: 1. Maintain at least the OPERABLE air lock door closed and either restore the inoperable air lock door to OPERABLE status within 24 hours or lock the OPERABLE air lock door closed. 2. Operation may continue until performance of the next required overall air lock leakage test provided that the OPERABLE air lock door is verified locked closed at least once per 31 days, 3. Otherwise be in at least MODE 3 within the next 6 hours and MODE 5 within the following 30 hours.	4.10.2. Containment Air Locks A. Each air lock shall be demonstrated OPERABLE: Verify that the overall air lock leakage rate, and the leakage rate for each door, are less than or equal to that specified by the Containment Leakage Rate Testing Program. Verifications shall be conducted at the frequency specified by the Containment Leakage Rate Testing Program. At least once per 6 months by verifying that only one door in each air lock can be opened at a time.

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
3.10.2 (Continued) 4. The provisions of Technical Specification 3.0.4 are not applicable. b.) With the containment air lock inoperable, except as a result of an inoperable air lock door, maintain at least one air lock door closed; restore the inoperable air lock to OPERABLE status within 24 hours or be in at least MODE 3 within the next 6 hours and in MODE 5 within the following 30 hours.	

6.10 Containment Leakage Rate Testing Program

1. A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995, with the following exceptions:

   a. Section 9.2.3 of NEI 94-01, Revision 0, is modified to permit the elapsed time between the first and last tests in a series of consecutive satisfactory Type A tests to be 18 months.

   b. Section 10.2.1 of NEI 94-01, Revision 0, is not applicable to Unit 1 penetration P-16. This exception for penetration P-16 shall expire at the completion of Unit 1 outage Z1R15.

2. The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 46.79 psig. The containment design pressure is 47 psig.

3. The maximum allowable containment leakage rate, L_a, at P_a, shall be $\leq$ 0.1% of containment air weight per day.

4. Leakage rate acceptance criteria are:

   a. Containment leakage rate acceptance criterion is $\leq 1.0\ L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $< 0.60\ L_a$ for the Type B and C tests and $< 0.75\ L_a$ for Type A tests;

   b. Air lock testing acceptance criteria are:

      1) Overall air lock leakage is $\leq 0.6\ L_a$ when combined with all Type B and C test results at a test pressure of $\geq P_a$.

      2) For each door, leakage rate is $\leq$ 1.0 SCFH when tested at $\geq$ 2.5 psig and $<$ 10 psig, or $\leq$ 4.75 SCFH when tested at $\geq$ 10 psig.

5. The provisions of Surveillance Requirement 4.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

6. The provisions of Surveillance Requirement 4.0.3 are applicable to the Containment Leakage Rate Testing Program.

ATTACHMENT C

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

In accordance with 10 CFR 50.92(c), Commonwealth Edison (ComEd) has determined that the proposed amendment involves no significant hazards considerations in that operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated

The proposed amendment cannot affect the probability of an accident since it involves only changes in the containment leakage rate testing program. There is no credible accident which can be initiated by containment leakage rate testing.

The proposed amendment will not affect the consequences of a accident since the allowable containment leakage rates, which determine the offsite consequences of a accident, are unchanged. Only the frequency of measuring the leakage rates may be changed.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated

The proposed amendment will not create the possibility of a new or different kind of accident since there are no changes to any systems, structures, or components, and no changes in the method of operation of any system, structure, or component.

3. Involve a significant reduction in a margin of safety

The proposed amendment will not involve a significant reduction in the margin of safety. As documented in the 10 CFR 50, Appendix J, Option B Proposed Rule and Final Rule published in the Federal Register, the additional industry wide risk resulting from the proposed change is marginal and within acceptable limits.

ATTACHMENT D

ENVIRONMENTAL ASSESSMENT EXCLUSION

Commonwealth Edison Company (ComEd) has evaluated this license amendment request using the criteria for licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. ComEd has determined that this license amendment request meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9), in that:

This change is proposed as an amendment to a license issued pursuant to 10 CFR 50, which changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, and which changes an inspection or a surveillance requirement, and the amendment meets the following specific criteria:

(i) The amendment involves no significant hazards considerations.

The determination that the proposed amendment will not create a significant hazard is documented in Attachment C to this LAR.

(ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite.

There will be no change in the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste.

(iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed amendment will not result in changes in the operation or configuration of the facility. There will be no change in the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste, nor will the proposal result in any change in the normal radiation levels within the plant.

ATTACHMENT E

CONTAINMENT LEAKAGE RATE TESTING PROGRAM IMPLEMENTATION PLAN

ComEd has formed an Appendix J implementation task force to implement and interpret the new rule in a consistent manner throughout ComEd. Each ComEd Nuclear Station (including Zion Station) is represented in the group. The task force will provide generic guidelines for all ComEd Nuclear Stations for the implementation of 10 CFR Part 50, Appendix J, Option B.

Requirement Source Documents

Zion Station will incorporate 10 CFR Part 50, Appendix J, Option B into the station containment leakage rate testing program. Zion Station will comply with the performance oriented and risk-based approaches including all performance based requirements and the following supporting documents:

- U. S. Nuclear Regulatory Commission Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," September 1995
- NEI 94-01 Revision 0, "Nuclear Energy Institute Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," Rev. 0
- ANSI/ANS-56.8-1994, "American National Standard for Containment System Leakage Testing Requirements"

Component Leakage Limits

Zion Station will use the administrative limits set by the ComEd Appendix J Implementation Task Force for components requiring Type B and C leakage rate testing. To determine whether an as-found local leak rate test (LLRT) passed or failed, a component's measured leakage will be compared against its administrative limit. These new administrative limits will be used to determine whether future or previous tests passed or failed. Thus, the limits chosen will affect each component's Type B or C testing frequency.

Two limits will be specified for each component, a warning limit and an alarm limit. When the component's leakage rate is above the warning limit and below the alarm limit, then the component should be evaluated for repair. This will not be counted as a performance failure. When the component's leakage rate is above the alarm limit, then the component will be repaired, except as noted below. This will be counted as a performance failure.

Although administrative limits will be used to maintain the containment in good condition, it should be noted that the sum of the as-left maximum pathway leakage rates for all Appendix J barriers must be less than 0.6 L_a where L_a is defined as the maximum allowable primary containment leakage rate. In the past, there have been instances where the leakage from one or more components has exceeded the alarm limits. To bring the leakage rate below the limit prior to start-up would have been very difficult and/or costly. For those special cases, a safety evaluation was performed. If this evaluation concluded that there was no significant safety impact, then the component(s) was(were) allowed to continue to leak in excess of the individual valve leakage limit until repairs could be conducted, provided that the limit of 0.6

L_a was not exceeded. However, the test was still considered to be a failure. Zion Station will continue to use this provision if necessitated by special circumstances.

Building Performance Baselines, Establishing Test Frequencies

Type A Tests

Per the new requirements associated with Appendix J, Option B, Type A testing shall be performed during a period of reactor shutdown at a frequency of at least once per 10 years based on acceptable performance history. Acceptable performance history will be as defined in NEI 94-01. Elapsed time between the first and last tests in a series of consecutive satisfactory tests used to determine an acceptable performance history will be the normal Zion Station refueling interval. NEI 94-01 states that this interval shall be at least 24 months, however, the normal Zion Station refueling interval of 18 months is a more appropriate minimum interval between Type A tests.

The new rule allows for reviewing past performance history with several options to determine if past Type A tests were satisfactory.

- In accordance with NEI 94-01, Sec. 9.2.3, as-Found Type A test results can be compared to 1.0 L_a, rather than the previous 0.75 L_a criteria.

- Leakage savings (repairs/adjustments) from Type B and C testable pathways which were added as penalties to the As-Found Type A test can be subtracted when reviewing previous Type A test results.

- The Type A test upper confidence limit from previous Type A tests may be recalculated using the Mass Point Methodology described in ANS-56.8-1994.

Zion Station has reviewed Type A test results as compared to the current requirements and criteria to establish a test frequency for the primary containment integrated leak rate test (ILRT). In reviewing Type A history, it has been determined that the two most recent Type A tests for Units 1 and 2 have been below the 1.0 L_a criteria. Zion Station will therefore implement the 10 year Type A test frequency based on the criteria set forth in the new rule during the next refueling outage, Z2R14. The corresponding due dates for the next required Type A test, based upon Option B, are March 2002 for Unit 1 and November 2002 for Unit 2.

Type B and C Tests

Zion Station will formulate administrative procedures for documenting Type B and C testing performance. A performance evaluation will be used to ensure that consistent criteria were applied to establish component baseline performance and their subsequent testing frequencies.

Zion Station has developed a computer and hard copy database to compile all the required leak rate historical data to be used in the evaluation process. This database will continue to be updated with the most current as-found leak rate data acquired during the most recent refueling outages. The performance

history of each component will be evaluated against the administrative limit to rate component performance over the last three refuel outages. In addition to a performance history evaluation, considerations such as service life, environment, design, system application, special service conditions, and safety impact/risk from failure will be reviewed and evaluated, and will be used to determine test frequency. Additionally, when maintenance is performed on valves that have been assigned an extended surveillance frequency, as-found leak testing will be conducted to provide additional assurance that the extended surveillance frequency is warranted.

Technical Criteria & Testing Methodology Interpretation

The administrative procedure(s) for the Containment Leakage Rate Testing Program will follow the requirements in the above listed source documents, and will contain performance criteria for Type A, B, and C testing. The administrative procedure(s) will also contain a description of the record keeping and methodology for establishing test intervals for equipment and components within the scope of Containment Leakage Rate Testing Program. The equipment and component test procedures will contain information on the proper techniques and methods for performing Type A, B, and C tests.

ATTACHMENT F

DISPOSITION OF PREVIOUSLY APPROVED EXEMPTIONS

10 CFR Part Part 50, Appendix J, Option B, Paragraph V.B.1 states that specific exemptions to Option A that have been approved by the NRC are still applicable to Option B, if necessary, unless specifically revoked by the NRC. The exemptions to Option A previously approved for Zion Station will be dispositioned as follows:

- The one-time schedular exemption allowing a delay in performance of a Type A test on Unit 1, which was approved by the NRC in a letter dated July 12, 1995, will no longer be necessary. The decreased frequency of testing allowed by Option B will eliminate the need for this exemption.

- The one time schedular exemption allowing a delay in testing of Unit 2 penetrations P-60 and P-80 until Z2R14, which was approved by the NRC staff in a November 20, 1995 letter, will remain applicable until testing is completed during the outage.

- The one time schedular exemption allowing a delay in testing of Unit 2 penetrations P-77 and P-102 until Z2R14, which was approved by the NRC staff in a December 28, 1995 letter, will remain applicable until testing is completed during the outage.

- The permanent exemption allowing alternate methods for testing Unit 1 and Unit 2 penetrations P-70 and P-99, which was approved by the NRC staff in a December 11, 1995 letter, will remain applicable. The basis for the exemption, and the alternate testing methods and acceptance criteria remain unchanged.

- The permanent exemption allowing alternate methods for testing Unit 1 and 2 penetrations P-19, P-34, P-43, P-75, P-76 and P-88, which was approved by the NRC staff in a December 28, 1995 letter, will remain applicable. The basis for the exemption, and the alternate testing methods and acceptance criteria remain unchanged.

- The permanent exemption decreasing the test frequency for Unit 1 penetration P-16 will be revoked. However, the proposed Containment Leakage Rate Testing Program contains a limited duration exemption from testing requirements for penetration P-16. This exemption will provide ComEd an opportunity to complete a modification that will permanently eliminate the need to test the penetration.

  In a December 28, 1995 letter, the NRC approved ComEd's request to test the penetration only during Type A tests, which are conducted three times in a ten year service period under Option A to Appendix J. Since Option B would allow reducing the frequency of Type A tests, the NRC further stated in the letter that "if the licensee adopts Option B of Appendix J for containment leakage rate testing at Zion Unit 1, the exemption for P-16 is hereby revoked and the matter will have to be reexamined under the requirements of Option B.

  ComEd plans to perform a plant modification during the next Unit 1 refueling outage, Z1R15, such that Type B testing will not be required

for P-16. The five tubing lines which pass through P-16 are part of the Reactor Vessel Leak Detection system. ComEd plans to decommission this system, and to close and deactivate the containment isolation valves for P-16. During Z1R15, the five tubing lines which pass through P-16 will be cut, capped, and leak tested in accordance with the applicable standards. ComEd has included an exemption for penetration P-16 in the proposed Containment Leakage Rate Testing Program administrative specification 6.10. This exemption will encompass the period from implementation of Appendix J Option B, until the completion of Z1R15. Although the schedule for Z1R15 is currently under review, ComEd expects the outage to end in late May or early June, 1997.

ComEd considers that a limited duration (seven to eight months) exemption for penetration P-16 will not present any significant risk to the public health and safety since there has never been a Type A leak rate test failure at Zion attributable to a compression fitting leak on these lines. Therefore, a limited duration exemption for penetration P-16 is consistent with the underlying principles of a performance based program. In addition, Containment Penetration P-16 is not required to be leakage rate tested until the next Type A Containment Leakage Rate Test. Under Option A, Containment Leakage Rate Testing will not be required for Unit 1 until Z1R15. As such, the duration of the requested exemption will be consistent with the frequency of testing previously granted in the December 28, 1995 letter, C.Y. Shiraki - U.S. Nuclear Regulatory Commission to D.L. Farrar - ComEd, issuing exemptions from the requirements of 10 CFR 50 Appendix J, Containment Leakage Rate Testing (Reference 3).