

Docket No. 50-213

ATTACHMENT 4
HADDAM NECK PLANT
STATUS OF CONTAINMENT INTEGRATED
LEAK RATE TEST PROGRAM

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Status of Compliance with Section III.A.6 of Appendix J

Section III.A.6 of Appendix J to 10 CFR 50 states:

- "(a) If any periodic Type A test fails to meet the applicable acceptance criteria in III.A.5.(b), the test schedule applicable to subsequent Type A tests will be reviewed and approved by the Commission.
- (b) If two consecutive periodic Type A tests fail to meet the applicable acceptance criteria in III.A.5.(b), notwithstanding the periodic retest schedule of III.D., a Type A test shall be performed at each plant shutdown for refueling or approximately every 18 months, whichever occurs first, until two consecutive Type A tests meet the acceptance criteria in III.A.5.(b) after which time the retest schedule specified in III.D may be resumed."

On August 10-12, 1984, CYAPCO performed a containment integrated leak rate test (CILRT) in the "as-found" condition, shortly after shutdown for refueling. No local leak rate testing or repair to valves and containment penetrations was performed prior to the start of the CILRT. Based on the difference between "As-Found" and "As-Left" leakage values for penetrations isolated during the CILRT, CYAPCO notified the NRC of a CILRT failure in the "As-Found" condition (reference LER 50-213/84-011-00). As a result, CYAPCO committed to perform a Type A test at the next refueling outage.

During the 1986 Haddam Neck Plant refueling outage, CYAPCO will perform a CILRT in the "As-Found" condition, as previously committed. During recent "As-Found" Type C local leak rate testing, several penetrations experienced excessive leakage. Based on expected "As-Left" leakage values for these penetrations, CYAPCO may fail the 1986 CILRT, and thereby have failed two consecutive Type A tests. Failure of two successive Type A Tests would require more frequent CILRTs.

Consistent with recent guidance provided by the NRC Office of Inspection and Enforcement in I&E Information Notice No. 85-71, "Containment Integrated Leak Rate Tests," CYAPCO will evaluate the results of the 1986 CILRT to determine whether additional integrated leak rate testing will effectively address the root causes for excessive local leakage or if an alternate corrective action program would be more effective in identifying and addressing the root causes of excessive local leakage. CYAPCO will inform the NRC Staff of its approach to resolving this issue.