

GPU Nuclear Corporation

Post Office Box 388 Route 9 South Forked River, New Jersey 08731-0388 609 971-4000 Writer's Direct Dial Number:

401

February 19, 1988

U.S. Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station Docket No. 50-219 Appendix J Leak Testing

During an NRC inspection of the Containment Leak Rate Testing Program at the Oyster Creek Nuclear Generating Station (OCNGS), it was stated that Appendix J of 10CFR50 does not recognize the mass plot calculational method currently being utilized for this testing at the OCNGS. Enclosure 1 requests exemption from 10CFR50, Appendix J, Section III.A.3 to the extent that conformance to ANSI N45.4-1972 is required. Exemption is requested to allow utilizing the mass-plot calculational method as specified in ANSI/ANS 56.8-1981 in lieu of the point-to-point or total time method specified in ANSI N45.4-1972.

General Public Utilities Nuclear (GPUN) is also requesting changes to Appendix A of the OCNGS Operating License DPR-16. Enclosure 2 presents a revision of Technical Specification Change Request No. 126 which was originally submitted by letter dated July 25, 1986. This revision includes additional information requested by the NRC staff by letter dated October 22, 1986 and during a telephone conference on March 19, 1987.

As discussed with the NRC staff, references to ANSI/ANS 56.8-1981 have been removed from the Technical Specification Change Request and Section 4.5.F has been clarified. Section 4.5.D.2 meets the requirements of 10CFR50, Appendix J which requires that failure of two (2) consecutive Type A tests requires performing the test at the next scheduled shutdown for refueling. As pertaining to drywell airlock testing, it was determined by the NRC staff that pursuant to Technical Evaluation Report #TER-C5257-36 "Containment Leakage Rate Testing" dated May 21, 1981, an exemption is not required to allow reduced pressure testing of the drywell airlock at six month intervals.

As requested by letter dated October 22, 1986, GFUN has investigated the potential use of resilent "T" type seals in containment vent and purge valves at Oyster Creek. The subject valves at Oyster Creek do not contain seals of this type; as the seal surfaces are located in the valve body. It should be noted these four (4) valves passed the "as found" leakage test during the 11R outage at the Oyster Creek station.

8803010366 880219 PDR ADOCK 05000219 P DCD

stion is a subsidiary of the General Public Utilities Corporation

During the above-referenced telecon on March 19, 1987, the NRC staff made further comments on the draft changes to Technical Specification Change Request No. 126. As a result, the Technical Specification Change Request has been revised to retain a test duration of at least 24 hours and the test frequency has been revised to conform to the Appendix J requirements.

Should you have any questions, please contact Mr. George W. Busch of the Licensing Department at $(60^{\circ})971-4909$.

Very truly yours,

elles

Vice President and Director Cyster Creek

PBF/GB/dmd (0102A)

cc: Mr. William T. Russell, Administrator Region I U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

Mr. Alexander W. Dromerick, Project Manager U.S. Nuclear Regulatory Commission Washington, DC

Dr. Thomas E. Murley, Director Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, DC 20555

NRC Resident Inspector Oyster Creek Nuclear Generating Station Forked River, NJ 08731

ENCLOSURE 1

~

REQUEST FOR EXEMPTION

In accordance with 10CFR 50.12, GPUN requests exemption from the requirements of 10CFR50, Appendix J. Section III.A.3. Currently, the calculational method utilized in conducting the Integrated Primary Containment Leak Rate Test (IPCLRT) is the mass plot approach as described in ANSI/ANS 56.8-1981. Since Section III.A.3 of 10CFR50, Appendix J references ANSI N45.4-1972, exemption is requested to allow utilization of the more accurate mass plot technique.

Special circumstances exist which support consideration of the requested exemption. As delineated in 10CFR50.12, Section (a)(2)(ii), application of the regulation in this instance is not necessary to achieve the underlying purpose of the rule. Furthermore, pursuant to Section (a)(2)(vi) present circumstances pertaining to the IPCLRT calculational method were not considered when the regulation was adopted and it is in the public interest to grant the requested exemption.

The purpose of the rule is to assure containment integrity throughout the operating life of the nuclear power plant. At the time Appendix J to 10CFR50 was adopted, ANSI N45.4-1972 provided test calculational methods (point-to-point and total time) which were adequate and suitable for the sensitivity levels of the instrumentation in use at the time. Since then, developments in the technology have resulted in superior methods for conducting leak rate testing. The mass plot method provides greater accuracy in determining leak rates and better serves the underlying purpose of the rule.

Furthermore, in recognizing the superiority of the mass plot method, the NRC staff has recommended that utilities in general and specifically the Oyster Creek Station develop and utilize the mass plot calculational method. This circumstance was not considered when the regulation was adopted. The IPCLRT at the Oyster Creek station has been conducted utilizing the mass plot calculational method with the knowledge and the recommendation of the Commission's staff since the promulgation of ANSI/ANS 56.8-1981.

During the period October 26-29, 1986, NRC Region I inspection personnel reviewed the Oyster Creek IPCLRT program including the mass plot calculation methodology. As a result of this review, the test procedure was revised to include an additional acceptance criterion. This criterion states that calculated leakage rate for the last 8 hours of a 24 hour test be less than .75 Lt (disregarding the 95% UCL). This criterion assures that a change in leak rate trend toward the end of the test will be identified. The additional acceptance criterion meets the intent of the extended ANSI method described in Draft Regulatory Guide (Task MS-021-5) "Containment System Leakage Testing".

ENCLOSURE 2

.

• •

TECHNICAL SPECIFICATION CHANGE REQUEST

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

GPU NUCLEAR CORPORATION)

DOCKET NO. 50-219

CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 126, Rev. 1 for the Oyster Creek Nuclear Generating Station Technical Specifications, filed with the United States Nuclear Regulatory Commission on February 19 , 1988, has this day of February 19 , 1988, been served on the Mayor of Lacey Township, Ocean County, New Jersey by deposit in the United States mail, addressed as follows:

> The Honorable Christopher Connors Mayor of Lacey Township 818 West Lacey Road Forked River, NJ 08731

By:

Peter B. Fiedler Vice President and Director Oyster Creek