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March 18, 1988

Mr. Samuel Chilk, Secretary
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D.C. 20555

Attention: Docketing and Service Branch

Dear Mr. Chilk:

COMMENTS ON PROPOSED REVISION
TO 10 CFR 50, APPENDIX J

This letter is to transmit our comments on the proposed revision to 10 CFR 50, Appendix J as published in the Federal Register on February 29, 1988.

We support the proposed change to Section III.A.3.a that allows the use of the Mass Point method of data analysis. We also endorse your proposal to remove the last sentence from this same section. We recommend, however, the test duration criteria in ANSI/ANS-56.8-1987, "Containment System Leakage Testing Requirements," Section 5.4 be accepted in the revised regulations.

The background information that was published with the proposed change acknowledges that advances in leakage rate technology have occurred since Appendix J was published in 1973. These advances, in both hardware and methodology, have not only resulted in improved methods of evaluating data, but have also made it possible to accurately measure a leakage rate in much less than 24 hours. We believe that using a results-based test termination criteria such as that described in Section 5.4 of ANSI/ANS-56.8-1987 will avoid needlessly prolonging tests without degrading the test's ability to detect unacceptable leakage. EPRI Report NP-3400, "Criteria for Determining the Duration of Integrated Leakage Rate Tests of Reactor Containments", December 1983, analyzed another results-based test termination criteria. This report concluded that the duration of an acceptably accurate containment integrated leakage rate test is primarily a function of test method and instrumentation system and that predefining a minimum duration had negligible effect on test accuracy.

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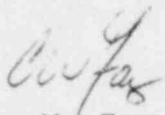
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Acknowledged by card

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We trust these comments will be useful to you in facilitating implementation of these proposed changes. We request that you also consider the additional revision discussed in this letter. We believe these regulations are important not only to assure the continued safety of plant operation, but also because of their direct impact on plant availability and costs.

Very truly yours,



C. W. Fay
Vice President
Nuclear Power