

DOCKET NUMBER PR-50 (3)
PROPOSED RULE
(53 FR 5985)



Public Service of New Hampshire
New Hampshire Yankee Division

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March 23, 1988

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PSNH
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OFFICE OF PUBLIC UTILITY
DOCKETING & SERVICE
BRANCH

Secretary
United States Nuclear Regulatory Commission
Washington, D. C. 20555

ATTENTION: DOCKETING AND SERVICE BRANCH

Dear Sir:

New Hampshire Yankee (NHY), a division of Public Service of New Hampshire (PSNH), appreciates this opportunity to comment on the proposed rule regarding 10 CFR 50 Appendix J published in the Federal Register, Vol. 53, No. 39, on Monday February 29, 1988. PSNH is the agent and representative of joint owners of Seabrook Station in Seabrook, New Hampshire.

The proposed rule, as specified, appears to be contrary with ANSI/ANS 56.8-1987 and a proposed general revision of Appendix J published in the Federal Register, Vol. 51, No. 209, on Wednesday October 29, 1986 in the area of ILRT test duration when using the Mass Point Analysis technique. Neither ANSI 56.8-1987 nor the proposed general revision of Appendix J specify a minimum test duration of 24 hours. Furthermore, requiring a minimum test duration of 24 hours when using the Mass Point Analysis technique appears to be without basis since ANSI/ANS 56.8-1987 requires (in Section 5.4) that "the duration of the test period must be sufficient to enable adequate data to be accumulated and statistically analyzed so that a leakage rate and upper confidence limit can be accurately determined".

The intent of the proposed rule change to codify the acceptability of the Mass Point Analysis Technique appears to be well intended and will relieve the industry of large amounts of regulatory uncertainty. Past testing experience throughout the industry has shown that adequate data can be accumulated and statistically analyzed in test periods less than 24 hours and has been recognized in the revised standard ANSI/ANS 56.8-1987. Requiring a minimum test duration of 24 hours when using the Mass Point Analysis technique may also produce many needless requests for exemption from this requirement.

Respectfully,
James W. Connolly
J. W. Connolly
Test Engineer

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add G. ARILL, NS-302

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Acknowledged by card.....
MAR 29 1988