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May 5, 1988

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

> Subject: Virgil C. Summer Nuclear Station Docket No. 50/395 Operating License No. NPF-12

Integrated Leakage Rate Testing

Reference a): D. A. Nauman letter dated April 15, 1988

Gentlemen:

The purpose of this letter is to provide clarification of our request submitted by Reference a). In addition to approval for utilization of bothel Topical Report BN-TOP-1, Revision 1, dated November 1, 1972, "Testing Criteria for Integrated Leakage Rate Testing of Primary Containment Structures for Nuclear Power Plants," for performance of a short duration integrated leakage rate test, a partial exemption from the requirement of 10CFR50 Appendix J, Section III.A.3.(a) is requested. Specifically, Appendix J requires the use of ANSI 45.4-1972 which describes the accepted methodology for performance of a Type A test. This standard only recognizes the Total Time Analysis technique. Approval for use of the Mass Point Analysis technique as an option is requested. However, use of the Mass Point Analysis technique of ANSI 56.8-1981 would be coupled with a minimum test duration of 24 hours.

Should you have any additional questions, please call at your convenience.

Very truly yours,

Ol Brackamfor

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