NRC-88-39

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March 29, 1988

Secretary of the Commission
Attention Docketing and Service Branch
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Comments on Proposed Rule Allowing the Use of ANSI/ANS-56.8-1987
(Mass Point Technology) to Calculate Containment Leakage Rates
Federal Register 5985, Monday, February 29, 1988, Vol. 53 No. 29

References: 1) D. C. Hintz to NRC Office of Administration, Comments on Duke Power Company's Amendments to Facility Operating Licenses, September 11, 1986

2) D. C. Hintz to NRC, Comments on Proposed 10 CFR 50, Appendix J, April 24, 1987

Wisconsin Public Service Corporation (WPSC) concurs with the NRC on its position to allow the use of mass point methodology in the calculation of containment leakage rates. The above references document WPSC's support for this technically superior method of calculating containment leakage. The use of this method should yield a more accurate indication of actual leakage rates.

For these reasons WPSC supports the proposed rule to allow the use of mass point methodology with one exception. The proposed rule requires a 24-hour test duration. This time limit appears arbitrary and is in conflict with ANSI/ANS 56.8-1987 "Containment System Leakage Testing Requirements." Section 5.4 of this ANSI/ANS standard states the following with regard to test duration: "The duration of the test period must be sufficient to enable adequate data to be accumulated and statistically analyzed" and, "A type A test shall last a minimum of eight hours after stabilization." WPSC therefore encourages the NRC to eliminate the 24-hour test duration in favor of criteria consistent with the ANSI/ANS standard.

It is hoped that this proposed rule reflects an NRC trend toward incorporating more modern and accurate testing methods which will eliminate unnecessary conservatisms while maintaining plant safety.

Sincerely,

D. C. Hintz
Vice President - Nuclear Power

ALH/jms

cc - Mr. Robert Nelson, US NRC
US NRC, Region III
US NRC Document Control Desk