

10 CFR 50.90

RS-03-145

August 19, 2003

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Subject: LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Request for Amendment to Technical Specifications
Section 5.5.13, "Primary Containment Leakage Rate Testing Program"

Reference: (1) Letter from K. Jury (EGC) to the NRC, "Request for Amendment to
Technical Specifications Section 5.5.13, 'Primary Containment Leakage Rate
Testing Program,'" dated October 24, 2002

In accordance with 10 CFR 50.90, Exelon Generation Company (EGC), LLC, hereby requests the following amendment to Appendix A, Technical Specifications (TS), of Facility Operating License Nos. NPF-11 and NPF-18. Specifically, the proposed change will modify TS 5.5.13, "Primary Containment Leakage Rate Testing Program," by identifying a specific exception to the testing guidance contained in Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak-Test Program."

LaSalle County Station (LSCS) Units 1 and 2 conduct their leakage rate testing of the primary containments to the requirements of 10 CFR 50.54(o) and 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," Option B as modified by approved exemptions. Additionally, the program is in accordance with the guidelines contained in RG 1.163. The proposed TS change would take exception to RG 1.163 guidance by allowing the testing of potential valve atmospheric leakage paths (e.g., valve stem packing), that are not exposed to reverse direction Type B or C leakage test pressure during the regularly scheduled Type A test. A list of the potential valve atmospheric leakage paths, the leakage rate measurement method and the acceptance criteria will be contained in the program. This exception will be applicable only to valves that are not isolable from the primary containment free air space.

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The NRC is currently reviewing a request by LSCS in Reference 1 for a one time extension in the next Type A test interval for LSCS Units 1 and 2 to approximately 15 years. The NRC approval of the one time extensions will influence the scheduling of the testing requested in this proposed TS change.

The information supporting the proposed TS change is subdivided as follows.

Attachment 1 provides our evaluation supporting the proposed changes.
Attachment 2 contains the copies of the marked up TS pages.
Attachment 3 provides the retyped TS pages.

The proposed TS change has been reviewed by the LSCS Plant Operations Review Committee (PORC) and approved by the Nuclear Safety Review Board (NSRB) in accordance with the Quality Assurance Program.

EGC is notifying the State of Illinois of this application for amendment by transmitting a copy of this letter and its attachments to the designated State Official.


We request approval of the proposed change by January 2, 2004 with an implementation period of 30 days to support the testing schedule for the Unit 1 refuel outage currently scheduled for January 13, 2004.

Should you have any questions concerning this submittal, please contact Mr. T. W. Simpkin at (630) 657-2821.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully,

Executed on 8/19/03


T. W. Simpkin
Manager - Licensing

Attachments:

Attachment 1. Evaluation of Proposed Change
Attachment 2. Markup of Proposed Technical Specification Page Change
Attachment 3. Retyped Page for Technical Specification Change

cc: Regional Administrator - NRC Region III
NRC Project Manager - NRC NRR
NRC Senior Resident Inspector - LaSalle County Station
Office of Nuclear Facility Safety - Illinois Department of Nuclear Safety

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1.0 INTRODUCTION

In accordance with 10 CFR 50.90, Exelon Generation Company (EGC), LLC, hereby requests the following amendment to Appendix A, Technical Specifications (TS), of Facility Operating License Nos. NPF-11 and NPF-18. Specifically, the proposed change will modify TS 5.5.13, "Primary Containment Leakage Rate Testing Program," by identifying a specific exception to the testing guidance contained in Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak-Test Program."

LaSalle County Station (LSCS) Units 1 and 2 conduct their leakage rate testing of the primary containments to the requirements of 10 CFR 50.54(o) and 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," Option B as modified by approved exemptions. Additionally, the program is in accordance with the guidelines contained in RG 1.163. The proposed TS change would take exception to RG 1.163 guidance by allowing the testing of potential valve atmospheric leakage paths (e.g., valve stem packing), that are not exposed to reverse direction Type B or C leakage test pressure during the regularly scheduled Type A test. A list of the potential valve atmospheric leakage paths, the leakage rate measurement method, and the acceptance criteria will be contained in the program. This exception will be applicable only to valves that are not isolable from the primary containment free air space. A list of the valves is contained in Table 1.

The NRC is currently reviewing a request by LSCS in Reference 1 for a one time extension in the next Type A test interval for LSCS Units 1 and 2 to approximately 15 years. The NRC approval of the one time extensions will effect the scheduling of the testing requested in this proposed TS change.

2.0 DESCRIPTION OF PROPOSED AMENDMENT

The proposed change to TS 5.5.13 will add a specific exception to the guidance contained in RG 1.163. The proposed change wording is identified below in bold type.

5.5.13 Primary Containment Leakage Rate Testing Program

- a. This program shall establish the leakage rate testing of the primary containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Testing Program," dated September 1995, as modified by the following exception.
 1. The potential valve atmospheric leakage paths that are not exposed to reverse direction test pressure shall be tested during the regularly scheduled Type A test. The program shall contain the list of the potential valve atmospheric leakage paths, leakage rate measurement method, and acceptance criteria. This

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exception shall be applicable only to valves that are not isolable from the primary containment free air space.

The marked up and retyped TS pages are contained in Attachments 2 and 3.

3.0 BACKGROUND

LSCS conducts their leakage rate testing of the primary containments to the requirements of 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B as modified by approved exemptions. 10 CFR 50, Appendix J, Option B identifies in a footnote that specific guidance concerning a performance-based leakage-test program is provided in RG 1.163. Additionally, LSCS in TS 5.5.13 identifies that the program shall be in accordance with the guidance contained in RG 1.163.

RG 1.163 provides the NRC's guidance on an acceptable performance-based leak-test program, leak-rate test methods, procedures and analysis that may be used to comply with the performance-based Option B in Appendix J to 10 CFR 50. RG 1.163 specifically endorses the use of Nuclear Energy Institute (NEI) 94-01, "Industry Guidelines for Implementing Performance-Based Option of 10CFR50 Appendix J."

NEI 94-01 Section 8.0, "Testing Methodologies for Type A, B and C Tests," provides certain exceptions, clarification to methods and techniques for a performance-based program. Section 8.0 states the following.

"It should be noted that the Type B or C tests performed on those pathways must test all of its containment barriers. This includes bonnets, packing, flanged joints, threaded connections and compression fittings. If the Type B or C test pressurizes any of the pathway's containment barriers in the reverse direction, it must be shown that the test results are not affected in a nonconservative manner by the directionality."

LSCS in LER 97-014-00 dated May 9, 1997, notified the NRC that they had discovered that 50 primary containment valves in Unit 1 and 2 (i.e., 25 on each unit) were not being tested consistent with the guidance contained in RG 1.163 and NEI 94-01. The valve design resulted in the valve stem packing not being exposed to the test pressure during the reverse direction Type B and C leakage tests. The LER corrective actions included the testing these valves prior to Unit 1 and 2 startup. The results of the testing revealed that 24 of the valves (i.e., 12 on each unit) could be tested with minimal changes to the test program. However, the remaining 26 valves are not isolable from the primary containment free air space and this resulted in very difficult test configurations that are described below.

- All the valves could be tested during a primary containment pressure test (e.g., Type A test),
- or

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- 24 of the valves (i.e., 12 on each unit) could be tested by enclosing the valve within a specially constructed clamping device. The enclosure would then be pressurized, thus exposing the stem packing to pressure. The remaining 2 valves could be tested from the Suppression Pool utilizing diver support. These valves' piping terminates below the normal Suppression Pool water level. A diver can install an expandable plug into the opening of the pipe. Instrumentation tubing could then be attached to the plug and the piping pressurized back to the valve, thus exposing the stem packing to test pressure.

In June of 2003, LSCS discovered that it had revised the program for testing of the primary containment to perform the testing of these 26 valves' stem packing during the regularly scheduled Type A test. This change was made without the required prior NRC approval. As a result, four missed leakage rate testing surveillances have occurred on both units. The Unit 1 valves are currently scheduled to be tested during the next refueling outage L1R10 in January 2004 and the Unit 2 valves are scheduled for refueling outage L2R10 in February 2005. Though testing of these valves' stem packing can be performed using the difficult methods described above, the leakage rate testing of these valves' stem packing is best performed during the Type A test. The NRC is currently reviewing a request by LSCS for a one time extension in the next Type A test interval for LSCS Units 1 and 2 to approximately 15 years. This submittal is requested to be approved prior to L1R10 to allow the valve stem packing tests to be performed during the Type A tests proposed in Reference 1 for no later than June 13, 2009 for Unit 1 and December 7, 2008 for Unit 2.

4.0 REGULATORY REQUIREMENTS & GUIDANCE

10 CFR 50.36(c)(5), "Administrative controls.", requires that provisions relating to organization and management, procedures, recording keeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner must be included in a licensee's TS.

10 CFR 50, Appendix J, Option B, Section V. B, "Implementation," specifies that the regulatory guide or other implementing documents used to develop a performance-based leakage testing program must be included, by general reference, in the plant's TS. Additionally, deviations from guidelines endorsed in a regulatory guide are to be submitted as a revision to the plant's TS.

5.0 TECHNICAL ANALYSIS

The testing requirements of 10 CFR 50, Appendix J provide assurance that leakage through the primary containment, including systems and components that penetrate the primary containment, does not exceed allowable leakage rate values specified in the TS and Bases. The allowable leakage rate is limited such that the leakage assumptions in the safety analyses are not exceeded.

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10 CFR 50, Appendix J, Section V. B specifies that the regulatory guide or other implementing documents used to develop a performance-based leakage testing program must be included, by general reference, in the plant's TS. Additionally, deviations from guidelines endorsed in a regulatory guide are to be submitted as a revision to the plant's TS. Therefore, this application does not require an exemption from 10 CFR 50, Appendix J, Option B.

The adoption of the Option B performance-based primary containment leakage rate testing program by LSCS did not alter the basic method by which Appendix J leakage rate testing is performed or its acceptance criteria, but it did alter the test frequency of primary containment leakage in Type A, B, and C tests. The required testing frequency is based upon an evaluation which utilizes the "as found" leakage history to determine the frequency for leakage testing which provides assurance that leakage limits will be maintained.

Type A testing is performed to verify the integrity of the containment structure in its Loss of Coolant Accident (LOCA) configuration. Results of previous Type A tests, presented below, demonstrate both containment structures remain essentially leak tight barriers and represent minimal risk to increased leakage.

10 CFR 50 Appendix J, Option B Test Information

Unit One

<u>Test Date</u>	<u>Total Leakage (Note 1)</u>	<u>Acceptance Limit (Note 1)</u>
06/14/94	0.2020%	0.635%
01/14/93	0.3498%	0.635%
12/23/89	0.3200%	0.635%
06/04/86	0.2690%	0.635%
05/14/82	0.3933%	0.635%

Unit Two

<u>Test Date</u>	<u>Total Leakage (Note 1)</u>	<u>Acceptance Limit (Note 1)</u>
12/08/93	0.3479%	0.635%
03/28/92	0.3523%	0.635%
06/03/90	0.4273%	0.635%
06/01/87	0.4055%	0.635%
06/24/83	0.2309%	0.635%

Note 1: Leakage rates are expressed in units of containment air weight percent per day at test pressure equal to the calculated peak containment internal pressure related to the DBA of 39.6 psig (Pa). Calculated results are expressed at a 95% confidence level plus leakage attributed to non-vented penetrations. The maximum allowable primary containment leakage rate allowed by Option B during containment leak rate testing is 0.635% containment air weight percent per day (1.0L_a).

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As described above, simplified leakage testing of the stem packing for the 26 valves listed on Table 1 is not possible. Modifications were evaluated that would allow testing of the valves in the normal direction. These modifications would require the addition of test boundary valves, test connections and/or valve stem packing modifications. These modifications would increase valve design complexity, provide additional potential leakage pathways and increase loading on piping penetrating primary containment. It was concluded that these modifications were not appropriate, as they would incur undue cost without a commensurate improvement in safety. This conclusion was based on the following.

- The valve stem packing have all been challenged for leakage during the performance of the Type A test as these seals form part of the primary containment boundary. There has not been a Type A failure at LSCS due to leaking stem packing from these valves.
- The proposed change will continue to test all potential valve atmospheric leakage paths and does not modify the acceptance criteria of the Type A, B or C tests.
- This proposed change will be applicable only to valves that are not isolable from the primary containment free air space.
- Installation and maintenance of safety related components are controlled by safety-related work orders which have sufficient controls to ensure that the work is performed properly. Hence, the valve stem packing used in safety-related components is expected to be installed correctly. In addition, post maintenance testing will verify the operability of the valve prior to returning the valve to service.
- Based on an EGC evaluation simultaneous failure of the stem packing in all the valves is not credible, the amount of increased containment leakage through failure of the stem packing of a few valves would not be sufficient to exceed 10 CFR 100 offsite exposure limits.
- Any leakage occurring through the subject valve stem packing would be into the Reactor Building (i.e., Secondary Containment). The Secondary Containment atmosphere would be treated by the Standby Gas Treatment System prior to release to the environment.
- Additionally, from a risk perspective, performing the testing of these valves' stem packing only during Type A testing is supported using the technical bases provided in NUREG-1493, "Performance Based Containment Leak Test Program." Past studies show that the overall reactor accident risks are not sensitive to variations in containment leakage rates because reactor accident risks are dominated by accident scenarios in which the containment fails or is bypassed. Such scenarios, even though they are of low probability, dominate the predicted accident risks due to their high consequences. Because containment leakage contributes less than 0.1% of overall accident risk, the overall impact is very small. The calculated risks are well below the NRC safety goal even at assumed containment leak rates several orders of magnitude above current requirements.
- Furthermore, the submitted Type A test interval extension report for LSCS provides a quantified numerical basis for the conclusion that extending the Type A test

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frequency from 3-in-10 years to 1-in-15 years is very small. It is reasonable to make a generalized conclusion that increasing the frequency for other Appendix J leak rate categories (i.e., valve stem packing) would also represent minimal risk.

- Finally, the testing of these 26 valve seats using the reverse direction testing will continue to be performed on the frequencies established as part of the leakage rate testing program. In many cases during this test, the outboard isolation valve is an identical valve subjected to the same service conditions. In these cases, the packing of the outboard valve is exposed to pressure during the leak rate test.

Based on the above discussion, it is concluded that modifications to the systems to allow normal direction testing is not appropriate and that the testing of these valve stem packings during the Type A test will provide an equivalent level of protection as that currently provided.

6.0 REGULATORY ANALYSIS

The proposed change will revise TS 5.5.13 to identify an exception that allows the testing of potential valve atmospheric leakage paths that are not exposed to reverse direction test pressure to be tested during the regularly scheduled Type A test. The exception deviates from the guidelines contained in RG 1.163 and NEI 94-01. Thus, the proposed change is consistent with the requirements of 10 CFR 36(c)(5) and 10 CFR 50, Appendix J, Section V. B and must be included in the TS.

Additionally, in accordance with 10 CFR 50, Appendix J, Section V. B, the proposed change to LSCS TS does not require a supporting request for an exemption to Option B of Appendix J, in accordance with 10 CFR 50.12, "Specific exemptions."

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

EGC has evaluated the proposed change to the TS for LaSalle County Station (LSCS), Unit 1 and Unit 2, and has determined that the proposed change does not involve a significant hazards consideration and is providing the following information to support a finding of no significant hazards consideration.

Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change will revise LaSalle County Station, Units 1 and 2, Technical Specification (TS) 5.5.13, "Primary Containment Leakage Rate Testing Program" by identifying a specific exception to the testing guidance contained in Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak-Test Program."

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The function of the primary containment is to isolate and contain fission products released from the reactor Primary Coolant System (PCS) following a design basis Loss of Coolant Accident (LOCA) and to confine the postulated release of radioactive material to within limits. The probability of an accident previously evaluated is not dependent on the test frequency of the primary containment Type A, B or C testing. The test interval associated with primary containment testing is not a precursor of any accident previously evaluated. The proposed specific exception to the testing guidance contained in RG 1.163 will continue to test all potential valve atmospheric leakage paths and will not be a precursor to a Design Basis Accident (DBA). Containment testing does provide assurance that the LaSalle County Station primary containments will not exceed allowable leakage rate values specified in the Technical Specifications and will continue to perform their design function following an accident.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change does not affect the control parameters governing unit operation or the response of plant equipment to transient conditions. The proposed change does not introduce any new equipment, modes of system operation or failure mechanisms.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

Does the change involve a significant reduction in a margin of safety?

Response: No

The integrity of the primary containment is verified through Type B and Type C local leak rate tests (LLRTs) and the overall leak tight integrity of the primary containment is verified by a Type A integrated leak rate test (ILRT) as required by 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors." These tests are performed to verify the essentially leak tight characteristics of the primary containment at the design basis accident pressure. The proposed change for a specific exception to the testing guidance contained in Regulatory Guide (RG) 1.163 will continue to test all potential valve atmospheric leakage paths and does not effect the test acceptance criteria for Type A, B or C testing. Therefore, LSCS has determined that the proposed change provides an equivalent level of protection as that currently provided.

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Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based upon the above, EGC concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

8.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

9.0 PRECEDENT

The proposed change is similar to a TS change approved for James A. FitzPatrick Nuclear Power Plant on October 4, 1996.

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Table 1
LaSalle County Station Unit 1 and 2 Valves

Valve Number and Title	Description and Vendor
1(2)RE026 Drywell Equipment Drain Sump Cooling Isolation Valve	AOV Globe (1") Anchor/Darling
1(2)E51-F069 RCIC Barometric Condenser Vac Pp. Discharge	MOV Globe (1.25") Rockwell Edwards
1(2)E51-F363 RCIC Full Flow Test Supp Pool Return	Manual Flex-Wedge Gate (4") Anchor Darling
1(2)HG001A Hydrogen Recombiner Drywell Suction	MOV Flex Wedge Gate (4") Anchor/Darling
1(2)HG001B Hydrogen Recombiner Drywell Suction	MOV Flex Wedge Gate (4") Anchor/Darling
1(2)HG005A Hydrogen Recombiner Supp Pool Discharge	MOV Flex Wedge Gate (6") Anchor/Darling
1(2)HG005B Hydrogen Recombiner Supp Pool Discharge	MOV Flex Wedge Gate (6") Anchor/Darling
1(2)FC113 Containment Bellows Seal Cavity Drain Line Flushing Water Supply	Manual Globe with Bellows (2") Anderson Greenwood
1(2)FC115 Rx Well Drain Header Upstrm Stop	Manual Flex-Wedge Gate (10") Anchor/Darling
1(2)E12-F017A RHR Drywell Spray Isolation	MOV Flex Wedge Gate (16") Anchor/Darling
1(2)E12-F017B RHR Drywell Spray Isolation	MOV Flex Wedge Gate (16") Anchor/Darling
1(2)VQ047 Drywell Nitrogen Make-up	MOV Globe with Bellows (1.5") Anderson/Greenwood
1(2)VQ050 Supp Pool Nitrogen Make- up	MOV Globe w/bellows (1.5") Anderson/Greenwood

ATTACHMENT 2

MARKUP OF PROPOSED TECHNICAL SPECIFICATION PAGE CHANGE

Revised TS Pages

5.5 Programs and Manuals

5.5.12 Safety Function Determination Program (SFDP) (continued)

- b. A loss of safety function exists when, assuming no concurrent single failure, and assuming no concurrent loss of offsite power or loss of onsite diesel generator(s), a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:
 - 1. A required system redundant to system(s) supported by the inoperable support system is also inoperable; or
 - 2. A required system redundant to system(s) in turn supported by the inoperable supported system is also inoperable; or
 - 3. A required system redundant to support system(s) for the supported systems described in b.1 and b.2 above is also inoperable.
- c. The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered. When a loss of safety function is caused by the inoperability of a single Technical Specification support system, the appropriate Conditions and Required Actions to enter are those of the support system.

5.5.13 Primary Containment Leakage Rate Testing Program

- a. This program shall establish the leakage rate testing of the primary containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix, J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Testing Program," dated September 1995. ~~X~~ **INSERT 1**
- b. The peak calculated primary containment internal pressure for the design basis loss of coolant accident, P_{c} , is 39.9 psig.

(continued)

INSERT 1

, as modified by the following exception.

- 1. The potential valve atmospheric leakage paths that are not exposed to reverse direction test pressure shall be tested during the regularly scheduled Type A test. The program shall contain the list of the potential valve atmospheric leakage paths, leakage rate measurement method, and acceptance criteria. This exception shall be applicable only to valves that are not isolable from the primary containment free air space.**

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**RETYPE PAGES
FOR
TECHNICAL SPECIFICATION CHANGE**

5.5 Programs and Manuals

5.5.12 Safety Function Determination Program (SFDP) (continued)

- b. A loss of safety function exists when, assuming no concurrent single failure, and assuming no concurrent loss of offsite power or loss of onsite diesel generator(s), a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:
 - 1. A required system redundant to system(s) supported by the inoperable support system is also inoperable; or
 - 2. A required system redundant to system(s) in turn supported by the inoperable supported system is also inoperable; or
 - 3. A required system redundant to support system(s) for the supported systems described in b.1 and b.2 above is also inoperable.
- c. The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered. When a loss of safety function is caused by the inoperability of a single Technical Specification support system, the appropriate Conditions and Required Actions to enter are those of the support system.

5.5.13 Primary Containment Leakage Rate Testing Program

- a. This program shall establish the leakage rate testing of the primary containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix, J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Testing Program," dated September 1995, as modified by the following exception.
 - 1. The potential valve atmospheric leakage paths that are not exposed to reverse direction test pressure shall be tested during the regularly scheduled Type A test. The program shall contain the list of the potential valve atmospheric leakage paths, leakage rate measurement

(continued)

5.5 Programs and Manuals

5.5.13 Primary Containment Leakage Rate Testing Program (continued)

method, and acceptance criteria. This exception shall be applicable only to valves that are not isolable from the primary containment free air space.

- b. The peak calculated primary containment internal pressure for the design basis loss of coolant accident, P_a , is 39.9 psig.
 - c. The maximum allowable primary containment leakage rate, L_a , at P_a , is 0.635% of primary containment air weight per day.
 - d. Leakage rate acceptance criteria are:
 - 1. Primary containment overall leakage rate acceptance criterion is $\leq 1.0 L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_a$ for the combined Type B and Type C tests, and $\leq 0.75 L_a$ for Type A tests.
 - 2. Air lock testing acceptance criteria are:
 - a) Overall air lock leakage rate is $\leq 0.05 L_a$ when tested at $\geq P_a$.
 - b) For each door, the seal leakage rate is ≤ 5 scf per hour when the gap between the door seals is pressurized to ≥ 10 psig.
 - e. The provisions of SR 3.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.
-