U.S. NUCLEAR REGULATORY COMMISSION

STANDARD REVIEW PLAN

OFFICE OF NUCLEAR REACTOR REGULATION

6.2.6 CONTAINMENT LEAKAGE TESTING

REVIEW RESPONSIBILITIES

Primary - Containment Systems and Severe Accident Branch ~~(CSB)~~(SCSB)[1]

Secondary - None

I. AREAS OF REVIEW

Information describing the reactor containment leakage testing program is reviewed by the ~~CSB~~SCSB[2] for conformance to 10 CFR Part 50, Appendix J, and General Design Criteria 52, 53, and 54.

The ~~CSB~~SCSB[3] review of the reactor containment leakage testing program covers the following specific areas:

1. Containment integrated leakage rate tests (Type A tests as defined by Appendix J), including pretest requirements, general test methods, acceptance criteria for preoperational and periodic leakage rate tests, provisions for additional testing in the event of failure to meet acceptance criteria, and scheduling of tests.

2. Containment penetration leakage rate tests (Type B tests as defined by Appendix J), including identification of containment penetrations, general test methods, test pressures, acceptance criteria, and scheduling of tests.

3. Containment isolation valve leakage rate tests (Type C tests as defined by Appendix J), including identification of isolation valves, general test methods, test pressures, acceptance criteria, and scheduling of tests.

4. Technical specifications pertaining to containment leakage rate testing are reviewed at the operating license (OL) or combined license (COL)[4] stage.

In addition to the tests described above, ~~CSB~~SCSB[5] reviews the special leakage testing programs that may be needed for the secondary containments for plants using the dual containment concept. Dual containments are proposed for some plants because of site limitations. The intent of the dual containment is to collect and process reactor containment leakage. Testing programs to ensure that leakage will be contained as proposed by applicants using this kind of containment are reviewed by ~~CSB~~SCSB[6] (see SRP Section 6.2.3).

II. ACCEPTANCE CRITERIA

The reactor containment leakage rate testing program, as described in the safety analysis report (SAR),[7] will be acceptable if it meets the requirements stated in Appendix J to 10 CFR Part 50. Appendix J provides the test requirements and acceptance criteria for preoperational and periodic leak testing of the reactor containment and of systems and components which penetrate the containment. Exceptions to Appendix J requirements will be reviewed on a case-by-case basis.

Conformance with the requirements of Appendix J constitutes an acceptable basis for satisfying the requirements of the following General Design Criteria applicable to containment leakage rate testing:

(a) General Design Criterion 52 (GDC 52),[8] "Capability for Containment Leakage Rate Testing," ~~General Design Criterion 52~~[9] as it relates to the reactor containment and exposed equipment being designed to accommodate the test conditions for the containment integrated leak rate test (up to the containment design pressure).

(b) General Design Criterion 53 (GDC 53),[10] "Provisions for Containment Testing and Inspection," ~~General Design Criterion 53~~[11] as it relates to the reactor containment being designed to permit appropriate inspection of important areas (such as penetrations), an appropriate surveillance program, and leak testing at the containment design pressure of penetrations having resilient seals and expansion bellows.

(c) General Design Criterion 54 (GDC 54),[12] "Piping System Penetrating Containment," ~~General Design Criterion 54~~[13] as it relates to piping systems penetrating primary reactor containment being designed with a capability to determine if valve leakage is within acceptable limits.

10 CFR ~~Part 100, §~~[14] 100.11 requires that, as an aid in evaluating a proposed nuclear power plant site, an applicant should assume the expected demonstrable leak rate from the containment. Nuclear power plant leak testing experience shows that a design leak rate of 0.1% per day provides adequate margin above typically measured containment leak rates and is compatible with current leak test methods and test acceptance criteria. Therefore, the minimum acceptable design containment leakage rate shall not be less than 0.1% per day.

10 CFR ~~Part 100, §100.1~~ 100.10[15] addresses factors to be considered when evaluating nuclear power plant sites and includes the safety features that are engineered into the facility. The secondary containment of dual-type containments, which provide for a controlled, filtered release to the environs of leakage from the primary reactor containment, is such an engineered safety feature, whose effectiveness must be periodically verified as required by Appendix J in Section IV.B. In so doing, the leakage limit of the secondary containment is acceptable if it is based on the limit used in the analysis of the secondary containment depressurization time. The test should be conducted at each refueling or at intervals not exceeding 18 months. The test limit should be consistent with the limit used for direct leakage in the analysis of the radiological consequences by ~~Accident Evaluation Branch (AEB)~~the Emergency Preparedness and Radiation Protection Branch (TERB).[16] Potential bypass leak paths (identified in accordance with Branch Technical Position CSB 6-3,[17] "Determination of Bypass Leakage Paths in Dual Containment Plants") should be locally leak tested in accordance with the requirements of Appendix J.

Appendix J in Section III.A.1(a) requires that no adjustment be made to the containment prior to the performance of the containment integrated leak rate test (CILRT) so that the containment can be tested in ~~a~~ as[18] close to the "as is" condition as practical. Instrumentation lines that penetrate containment, however, are sometimes isolated for the CILRT. To ~~assure~~ensure[19] that they are included in the test, the following should be done. Leak testing of instrumentation lines that penetrate containment may be done in conjunction with either the local leak rate tests or the containment integrated leak rate test. Instrumentation lines that are not locally leak tested should not be isolated from the containment atmosphere during the performance of the CILRT. The measured leakage rates from instrumentation lines that are locally leak tested should be added to the CILRT result. Provisions should be made to ~~assure~~ensure[20] that instrumentation lines isolated during the CILRT are restored to their operable status following the test.

Appendix J in Section III.A.1(d) addresses the opening of systems for the containment integrated leak rate test if they are open to the containment atmosphere under post-accident conditions and become an extension of the boundary of the containment. In this regard, leak testing of hydrogen recombiner systems located outside containment should be included in the local leak rate test program. A local leak test should be done at the time of the CILRT and the measured leak rate added to the CILRT result. Alternately, the recombiner system may be open to the containment atmosphere during the performance of the CILRT.

All leakage tests, performed by either pneumatic or hydrostatic means, should have[21] the capability to quantify the leakage rates either explicitly or by a conservative bounding method to satisfy test acceptance criteria in Appendix J.

Appendix J in Section III.C.1 prescribes methods for conducting the containment isolation valve leak rate tests. At the construction permit (CP) or standard design certification stage,[22] the applicant should identify all containment isolation valves that will be locally (Type C) leak tested with the test pressure applied in a direction opposite to that which would occur under accident conditions and should[23] commit to justify, at the OL or COL[24] stage, that such testing will result in equivalent or more conservative results.

With regard to the application of Section III.C.1 of Appendix J for leak testing of main steam isolation valves in boiling water reactor plants, a test pressure of less than P_a and the test acceptance criteria should be justified and included in the plant technical specifications.

Hydrostatic testing of containment isolation valves is permissible if the line is not a potential containment atmosphere leak path and may be found acceptable if it can be demonstrated, in accordance with the requirements of Section III.C of Appendix J, that a liquid inventory is available to maintain a water seal (while assuming the single failure of any active component) during the post-accident period. Limits for liquid leakage should be assigned to these valves based on analysis and included in the plant technical specifications.

Leak testing, to ~~assure~~ensure[25] that containment integrity is restored following the test, vent, and drain (TVD) connections that are used to facilitate local leak testing and the performance of the containment integrated leak rate test, should be under administrative control and should be subject to periodic surveillance, to ~~assure~~ensure[26] their integrity and to verify the effectiveness of administrative controls.

The testing requirements for BWR drywell steam bypass are discussed in SRP Section 6.2.1.1.C.

Technical Rationale[27]

The technical rationale for application of these acceptance criteria is discussed in the following paragraphs:[28]

1. Compliance with GDC 52 requires that the reactor containment and associated equipment be designed so that periodic integrated leak rate testing can be conducted at containment design pressure.

   GDC 52 applies to SRP Section 6.2.6 because the review focuses on containment leakage rate testing, which includes the integrated leak rate testing specified in GDC 52. The requirement for integrated leak rate testing of the reactor containment is imposed to ensure that it will function as designed in the event of an accident.

   Meeting the requirements of GDC 52 provides assurance that the reactor containment will function as designed and that releases of fission products to the environment will not result in offsite radiation doses in excess of the guideline doses specified in 10 CFR Part 100.[29]

2. Compliance with GDC 53 requires that the reactor containment be designed to permit (a) periodic inspection of penetrations, (b) an appropriate surveillance program, and (c) periodic testing of the leaktightness of penetrations with resilient seals and expansion bellows.

   GDC 53 applies to SRP Section 6.2.6 because the review broadly covers containment testing. The requirement for inspection, surveillance, and periodic testing of reactor containment penetrations, particularly those with resilient seals and expansion bellows, because these penetrations are among the containment vessel components most likely to be the source of leakage.

Meeting the requirements of GDC 53 provides assurance that containment penetrations will function as designed in terms of leakage and will not contribute unduly to offsite radiation doses.[30]

3. Compliance with GDC 54 requires that piping systems penetrating primary reactor containment be provided with leak detection, isolation, and performance testing capabilities.

GDC 53 applies to SRP Section 6.2.6 because the review broadly covers containment testing. The requirements of GDC 54 are imposed so that unanticipated leakage from piping systems penetrating the reactor containment will not occur during the recovery period that follows a loss-of-coolant accident (LOCA). Such leakage would compromise the ability of the system to limit the release of fission products to the environment.

Meeting this requirement provides assurance that piping systems penetrating the reactor containment will not be an additional source of leaking fission products and, hence, that releases of fission products off site will not result in radiation doses in excess of the guideline doses specified in 10 CFR Part 100.[31]

4. Appendix J to 10 CFR Part 50 specifies requirements and acceptance criteria for preoperational and periodic testing of the leaktightness of the reactor containment and penetrations.

Appendix J applies to SRP Section 6.2.6 because it contains detailed requirements concerning the manner in which the reactor containment and its parts must be tested. These tests include (a) periodic integrated leak rate tests, (b) local testing of containment penetration leakage rates, and (c) local testing of isolation valve leakage rates. Appendix J includes pertinent information on the frequency of testing, pressures at which tests will be conducted, reporting of test results, and acceptance criteria for testing.

Meeting the requirements of Appendix J to 10 CFR Part 50 provides assurance that the leaktightness of the containment will be within the values specified in the facility technical specifications and that offsite radiation doses in excess of the guideline doses specified in 10 CFR Part 100 will not occur.[32]

5. 10 CFR 100.10 focuses on factors to be considered when evaluating potential sites for nuclear power plants. Safety features engineered into the nuclear reactor plant constitute one such factor.

Reactor containment is an engineered safety feature that, as specified by 10 CFR Part 100, must be considered when evaluating potential sites for nuclear power plants. Thus, the potential for leakage from the containment vessel must be considered as an integral aspect of determining the acceptability of the site.

Addressing engineering safety features collectively (including reactor containment) provides assurance that the guideline doses specified in 10 CFR Part 100 will not be exceeded should an accident occur.[33]

6. 10 CFR 100.11 specifies the manner in which exclusion area distance, low population zone distance, and population center distance are determined for a proposed nuclear plant site.

The containment leakage rate is one of the factors considered when calculating radiation doses associated with accidents. Radiation doses thus calculated determine the acceptability of the exclusion area distance, low population zone distance, and population center distance.

Verifying the containment leakage rate by means of periodic testing provides assurance that the leakage rate will remain below values assumed in the accident analysis conducted to determine the acceptability of the nuclear power plant site and that offsite radiation doses will be within the guideline doses specified in 10 CFR Part 100.[34]

III. REVIEW PROCEDURES

At the CP stage, the ~~CSB~~SCSB[35] will review the preliminary design provisions that will permit containment leak testing to be done in accordance with the requirements of Appendix J. In some instances, however, the applicant may not be able to address specific aspects of the leak testing program because of incomplete designs. Under these circumstances, the ~~CSB~~SCSB[36] will review design criteria, and other commitments, that will ~~assure~~ensure[37] compliance with the requirements of Appendix J. In addition, the ~~CSB~~SCSB[38] will review the applicant's rationale for concluding that the requirements of Appendix J will be met.

At the OL or COL[39] stage, the ~~CSB~~SCSB[40] reviews the containment final design and verifies that the containment leak testing program meets the requirements of Appendix J. In addition, the ~~CSB~~SCSB[41] reviews the plant technical specifications for completeness and for conformance to Appendix J.

The review of the reactor containment leakage rate test program at the OL or COL[42] stage specifically includes the following:

1. Containment Integrated Leakage Rate Test (Type A Test)

Those systems not vented or drained should be identified and the reason for not venting or draining should be stated. Piping and instrumentation diagrams and process flow drawings are used by the reviewer to confirm that, in the vented and drained condition, the isolation valves are exposed to the test air pressure and differential pressure, i.e., the systems are vented and drained both upstream and downstream of the containment isolation valves.

In the FSER for the System 80+ design certification, the staff accepted a partial exemption from the requirements of Section III.A.1(a) of Appendix J. This section of

Appendix J requires that a Type A test be terminated if, during this test, potentially excessive leakage paths are identified which would either interfere with satisfactory completion of the test or which would result in the Type A test not meeting the applicable Appendix J acceptance criteria. Section III.A.1(a) further requires that, after terminating a Type A test due to potentially excessive leakage, the leakage through those leakage paths be measured using local leakage testing methods and repairs and/or adjustments to the affected equipment be made. The Type A test shall then be conducted. For the System 80+ plant, the applicant proposed that leaks occurring during the Type A test that could affect the test results would not prevent completion of this test if: (a) the leaks are isolated for the balance of the test; (b) the leaking component had a "pre-maintenance" local leak rate test whose results, when added to those from the Type A test, are in conformance with the acceptance criteria of Appendix J; or (c) a "postmaintenance" local leak rate test of the leaking component(s) is performed and the results, when added to those from the Type A test, conform to the acceptance criteria of Appendix J. The staff accepted the applicant's proposal as an Appendix J exemption since the proposed alternative accomplishes the intent of the regulation.[43]

2. Containment Penetration Leakage Rate Test (Type B Test)

All containment penetrations should be listed in the test program. By reference to piping and instrumentation diagrams, the reviewer confirms that all penetrations have been listed. The program should identify any penetration not requiring leakage testing and the reason for not requiring a test should be stated. The reviewer confirms that those penetrations not requiring testing cannot result in leakage to the atmosphere during normal operation or a LOCA.

Test pressures for containment penetrations should be stated in the test program and in the Technical Specifications. The test pressure is acceptable if it is the maximum calculated containment accident pressure.

3. Containment Isolation Valve Leakage Rate Test (Type C Test)

All containment isolation valves requiring a Type C test should be listed in the test program. By reference to the piping and instrumentation diagrams, the reviewer confirms that all isolation valves to be tested have been listed.

Test pressures for isolation valve Type C tests should be included in the test program and technical specifications.

Special testing procedures for dual-type containments should be identified.

~~CSB~~SCSB[44] ~~assures~~ensures[45] that the applicant has provided a leakage testing program and has specified the maximum leakage which may occur from bypass (or dilution) leakage for dual-type containments. Potential leakage paths which bypass the annulus or the auxiliary building areas or may leak directly to atmosphere must be identified. The total amount of containment bypass leakage to the environment must be specified and included in the technical specifications. The reviewer determines that the test provisions are adequate to confirm the bypass leakage specified.

Preoperational and periodic test reports are ~~primarily~~reviewed by the appropriate NRC Regional Office~~by the Office of Inspection and Enforcement~~.[46]

In SECY 93-087 (Reference 6) the staff recommended that the interval for Type C testing be changed from 24 months, as specified in Appendix J, to 30 months. The Commission approved this recommendation in its SRM dated July 21, 1993. Since no applicable regulation has been issued for this position, a partial exemption from Appendix J would be required for an applicant to utilize a 30 month interval for Type C testing.[47]

For standard design certification reviews under 10 CFR Part 52, the procedures above should be followed, as modified by the procedures in SRP Section 14.3 (proposed), to verify that the design set forth in the standard safety analysis report, including inspections, tests, analysis, and acceptance criteria (ITAAC), site interface requirements and combined license action items, meet the acceptance criteria given in subsection II. SRP Section 14.3 (proposed) contains procedures for the review of certified design material (CDM) for the standard design, including the site parameters, interface criteria, and ITAAC.[48]

IV. EVALUATION FINDINGS

The reviewer verifies that sufficient information has been provided and that ~~his~~ the[49] evaluation supports conclusions of the following type, to be included in the staff's safety evaluation report:

The staff concludes that the containment leak testing program is acceptable and meets the requirements of General Design Criteria 52, 53, and 54; Appendix J to 10 CFR Part 50; and 10 CFR Part 100. This conclusion is based on the following: [The reviewer should discuss each item of the regulations or related set of regulations as indicated.]

1. The applicant has met the requirements of (cite regulation) with respect to (state limits of review in relation to regulation) by (for each item that is applicable to the review state how it was met and why acceptable with respect to the regulation being discussed):

   a. Meeting the regulatory positions in Regulatory Guide(s) ___;

   b. Providing and meeting an alternative method to regulatory positions in Regulatory Guide _____, that the staff has reviewed and found to be acceptable;

   c. Meeting the regulatory position in BTP ___;

   d. Using calculational methods for (state what evaluated) that have been previously reviewed by the staff and found acceptable; the staff has reviewed the impact parameters in this case and found them to be suitably conservative or performed independent calculations to verify acceptability of their analysis; and/or

e. Meeting the provisions of (industry standard number and title) that have been reviewed by the staff and determined to be appropriate for this application.

2. Repeat discussion for each regulation cited above.

For design certification reviews, the findings will also summarize, to the extent that the review is not discussed in other safety evaluation report sections, the staff's ITAAC evaluation, including design acceptance criteria, site interface requirements, and COL action items that are relevant to this SRP section.[50]

V. IMPLEMENTATION

The following is intended to provide guidance to applicants and licensees regarding NRC staff plans for using this SRP section.

This SRP section will be used by the staff when performing safety evaluations of license applications submitted by applicants pursuant to 10 CFR 50 or 10 CFR 52.[51] Except in those cases in which the applicant proposes an acceptable alternative method for complying with specified portions of the Commission's regulations, the method described herein will be used by the staff in its evaluation of conformance with Commission regulations.

The provisions of this SRP section apply to reviews of applications docketed six months or more after the date of issuance of this SRP section.[52]

VI. REFERENCES

1. 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors."

2. 10 CFR Part 50, Appendix A, General Design Criterion 52, "Capability for Containment Leakage Rate Testing."

3. 10 CFR Part 50, Appendix A, General Design Criterion 53, "Provisions for Containment Testing and Inspection."

4. 10 CFR Part 50, Appendix A, General Design Criterion 54, "Piping[53] Systems Penetrating Containment."

5. 10 CFR Part 100, "Reactor Site Criteria."

6. SECY 93-087, "Policy, Technical, and Licensing Issues Pertaining to Evolutionary and Advanced Light-Water Reactor (ALWR) Designs," April 2, 1993, and corresponding Staff Requirements Memorandum dated July 21, 1993.[54]

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Attachment A - Proposed Changes in Order of Occurrence

Item numbers in the following table correspond to superscript numbers in the redline/strikeout copy of the draft SRP section.

Item	Source	Description
1.	Current PRB name and abbreviation	Changed PRB to Containment Systems and Severe Accident Branch (SCSB).
2.	Current PRB abbreviation	Changed PRB to SCSB.
3.	Current PRB abbreviation	Changed PRB to SCSB.
4.	SRP-UDP format item	Added reference to combined license (COL) per 10 CFR Part 52.
5.	Current PRB abbreviation	Changed PRB to SCSB.
6.	Current PRB abbreviation	Changed PRB to SCSB.
7.	Editorial	Spelled out safety analysis report to identify SAR.
8.	Editorial	Provided abbreviation for General Design Criterion 52.
9.	Editorial	Deleted redundant reference to General Design Criteria and combined title and description into a single paragraph.
10.	Editorial	Provided abbreviation for General Design Criterion 53.
11.	Editorial	Deleted redundant reference to General Design Criteria and combined title and description into a single paragraph.
12.	Editorial	Provided abbreviation for General Design Criterion 54.
13.	Editorial	Deleted redundant reference to General Design Criteria and combined title and description into a single paragraph.
14.	Editorial	Corrected citation format for 10 CFR 100.11.
15.	Editorial	Corrected reference from 10 CFR 100.1 to 10 CFR 100.10 and revised citation format.
16.	Current review branch name and abbreviation	Changed review branch to Emergency Preparedness and Severe Accident Branch (TERB).
17.	SRP-UDP format item	Consideration should be given to updating Branch Technical Position CSB 6-3. An IDP 7.0 Form has been prepared to recommend updating.
18.	Editorial	Changed "a" to "as" to improve clarity.
19.	Editorial	Changed "assure" to "ensure" to correct usage.
20.	Editorial	Changed "assure" to "ensure" to correct usage.
21.	Editorial	Added "have" to improve clarity.

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Attachment A - Proposed Changes in Order of Occurrence

Item	Source	Description
22.	SRP-UDP format item	Added reference to design certification per 10 CFR Part 52.
23.	Editorial	Added "should" to provide parallelism within sentence and to improve clarity.
24.	SRP-UDP format item	Added reference to COL per 10 CFR Part 52.
25.	Editorial	Changed "assure" to "ensure" to correct usage.
26.	Editorial	Changed "assure" to "ensure" to correct usage.
27.	SRP-UDP format item/ Develop technical rationale	Added "Technical Rationale" to ACCEPTANCE CRITERIA and arranged in numbered paragraph form to describe the bases for referencing GDC 52, 53, and 54, Appendix J to 10 CFR Part 50, 10 CFR 100.10, and 10 CFR 100.11.
28.	SRP-UDP format item/ Develop technical rationale	Added lead-in sentence for "Technical Rationale."
29.	SRP-UDP format item/ Develop technical rationale	Added technical rationale for GDC 52.
30.	SRP-UDP format item/ Develop technical rationale	Added technical rationale for GDC 53.
31.	SRP-UDP format item/ Develop technical rationale	Added technical rationale for GDC 54.
32.	SRP-UDP format item/ Develop technical rationale	Added technical rational for Appendix J to 10 CFR Part 50.
33.	SRP-UDP format item/ Develop technical rationale	Added technical rationale for 10 CFR 100.10.
34.	SRP-UDP format item/ Develop technical rationale	Added technical rationale for 10 CFR 100.11.
35.	Current PRB abbreviation	Changed PRB to SCSB.
36.	Current PRB abbreviation	Changed PRB to SCSB.
37.	Current PRB abbreviation	Changed PRB to SCSB.
38.	SRP-UDP format item	Added reference to COL per 10 CFR Part 52.
39.	Editorial	Changed "assure" to "ensure" to correct usage.
40.	Current PRB abbreviation	Changed PRB to SCSB.
41.	Current PRB abbreviation	Changed PRB to SCSB
42.	SRP-UDP format item	Added reference to COL per 10 CFR Part 52.
43.	Integrated Impact 1476	Added a description of an Appendix J exemption approved by the staff in the System 80+ FSER.

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Attachment A - Proposed Changes in Order of Occurrence

Item	Source	Description
44.	Current PRB abbreviation	Changed PRB to SCSB.
45.	Editorial	Changed "assures" to "ensures" to correct usage.
46.	SRP-UDP format item	Replaced reference to Office of Inspection and Enforcement with NRC Regional Office.
47.	Integrated Impact 1434	Added a discussion of the SECY 93-087 position that the interval between Type C leak rate testing be 30 months instead of 24 months.
48.	SRP-UDP Guidance, Implementation of 10 CFR 52	Added standard paragraph to address application of Review Procedures in design certification reviews.
49.	Editorial	Changed "his" to "the" to eliminate gender-specific terminology.
50.	SRP-UDP format item	Added reference to design certification reviews.
51.	SRP-UDP Guidance, Implementation of 10 CFR 52	Added standard sentence to address application of the SRP section to reviews of applications filed under 10 CFR Part 52, as well as Part 50.
52.	SRP-UDP Guidance	Added standard paragraph to indicate applicability of this section to reviews of future applications.
53.	Editorial	Added "Piping" to correct title of GDC 54.
54.	Integrated Impact 1434	Added SECY 93-087 and its corresponding SRM as a new reference.

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Attachment B - Cross Reference of Integrated Impacts

Integrated Impact No.	Issue	SRP Subsections Affected
1434	Revise the SRP to address the revision of the time interval for Type C containment leak rate testing discussed in SECY 93-087.	Subsection III, Review Procedures, Item 3
1476	Revise the SRP to describe the Appendix J leak rate testing exemption approved by the staff in the System 80+ FSER.	Subsection III, Review Procedures, Item 1