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SUBJECT: Forwards proposed Tech Spec Change NPF-10/15-351, revising  
Tech Spec 3/4.6.1.2, "Containment Leakage" to permit third  
Type A test of each 10-yr inservice insp interval to be  
conducted during separate plant outage.

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TITLE: OR Submittal: Append J Containment Leak Rate Testing

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**Southern California Edison Company**

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HAROLD B. RAY  
SENIOR VICE PRESIDENT

April 8, 1991

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
Request for Exemption to 10 CFR 50, Appendix J  
Proposed Technical Specification Change NPF-10/15-351  
San Onofre Nuclear Generating Station  
Units 2 and 3

The Southern California Edison (SCE) Company seeks relief from the requirements of Title 10 of the Code of Federal Regulations, Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors." Containment integrated leakage rate test requirements are established in 10 CFR 50, Appendix J. The purpose of the Appendix J test program is to ensure that leakage through the primary reactor Containment, systems, and components penetrating primary Containment, does not exceed allowable leakage rate values specified within plant technical specifications.

The Containment overall integrated leakage rate test (ILRT), or Type A test, is specifically required by Section III.D of Appendix J. In addition, Appendix J Section III.D specifies a periodic retest schedule for these Type A tests. The requirements specify that a set of three Type A tests be performed at approximately equal intervals during each 10-year service period. The third test of each set, however, is required to be performed when the plant is shutdown for the 10-year plant Inservice Inspection (ISI).

This requirement is implemented as part of testing to satisfy Surveillance Requirement 4.6.1.2.a of Technical Specification (TS) 3/4.6.1.2, "Containment Leakage." TS 3/4.6.1.2 provides constraints on Containment leakage rate limits, and also specifies certain surveillance requirements to demonstrate that the Containment leakage rate limits are within their limits. Surveillance Requirement 4.6.1.2.a specifically delineates the Appendix J, Section III.D testing schedule.

During the upcoming Unit 2 Cycle 6 Refueling Outage, the third Containment ILRT for the first 10-year service period is scheduled to be conducted. However, only a portion of the 10-year ISI, is currently scheduled for this outage. The Reactor Vessel ISI is scheduled for the Unit 2 Cycle 7 Refueling Outage as it is planned to be a long outage. The Cycle 7 Refueling Outage also marks the end of the unit's first 10-year ISI interval.

The Containment ILRT must be performed during the upcoming outage in order to meet the surveillance interval. The Type A test performed during the Unit 2

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April 8, 1991

Cycle 6 Refueling Outage will also be the third Type A test required by Surveillance Requirement 4.6.1.2.a. The same scheduling constraints will also apply to the Unit 3 Cycle 5 Refueling Outage.

A revision to Technical Specification 3/4.6.1.2 is required to enable SCE to perform the Type A test during the Cycle 6 Refueling Outage even though the remaining 10-year ISI will be performed during the Cycle 7 Refueling Outage. In addition, to achieve the desired revision to the technical specification, an exemption to the requirements of 10 CFR 50, Appendix J, Section III.D.1(a) would be necessary.

In accordance with the requirements of 10 CFR 50.12, an exemption to the requirements of 10 CFR 50, Appendix J, Section III.D.1(a), is requested by SCE. The details and basis for this request, are provided in Enclosure I to this letter. Enclosure II to this letter, is comprised of Amendment Application Number 104 for Unit 2, and Amendment Application Number 89 for Unit 3. The amendments consist of Proposed Technical Specification Change NPF-10/15-351 (PCN-351). PCN-351 is a request to revise Technical Specification 3/4.6.1.2, "Containment Leakage," and its associated Bases 3/4.6.1.2, "Containment Leakage," to allow the third set of each 10-year Containment ILRT and ISI to be performed during separate outages.

The Unit 2 Cycle 6 Refueling Outage is scheduled to commence approximately August 3, 1991. Due to the tight schedule, SCE will work closely with the NRC Staff to facilitate timely approval of this request. NRC approval of the Proposed Technical Specification Change and the exemption request will be required prior to entering Mode 4 upon restart of the unit. This is anticipated to occur approximately October 19, 1991. Unit 3 is scheduled to begin the Cycle 5 Refueling Outage January 15, 1992. The exemption request and Proposed Technical Specification Change would also be required for SONGS Unit 3 based on the current scheduling of the ILRT and the 10-year ISI.

Should you have any questions, or desire additional information concerning this request for an exemption and the Proposed Technical Specification Change, please contact me.

Very truly yours,

Enclosures

cc: J. B. Martin, Regional Administrator, NRC Region V  
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre,  
Units 1, 2, and 3