

NOV 23 1976

Dockets Nos. 50-269/270/287

Duke Power Company
ATTN: Mr. William O. Parker, Jr.
Vice President
Steam Production
Post Office Box 2178
422 South Church Street
Charlotte, North Carolina 28242

Gentlemen:

Your letter dated September 5, 1976, requested an exemption to the requirements of 10 CFR Part 50, Appendix J, for airlock testing at Oconee Nuclear Station.

We have reviewed your request for exemption which would allow you to continue to test at four month intervals except when the airlocks are not opened, and in no case at intervals greater than 12 months. The justification which you have provided does not sufficiently support the difference between the Oconee Technical Specification requirements and the provisions of Appendix J, which require testing of airlocks at six month intervals and after each opening.

You should provide us with additional justification supporting your Technical Specification testing program or provide an alternate approach in support of your exemption request. We have prepared the enclosed guidelines setting forth an acceptable approach to meeting the objectives of Appendix J which you may find useful. In either case, you should provide complete justification for your approach.

It is requested that you provide your response to us within 30 days so that we may continue our review of your exemption request.

Sincerely,

/s/
A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors

Enclosure:
Guidelines on Containment
Airlocks

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Duke Power Company

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November 23, 1976

cc: Mr. William L. Porter
Duke Power Company
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422 South Church Street
Charlotte, North Carolina 28242

Mr. Troy B. Conner
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1747 Pennsylvania Avenue, N. W.
Washington, D. C. 20005

Oconee Public Library
201 South Spring Street
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CONTAINMENT AIRLOCKS

Appendix J to 10 CFR 50 requires that reactor containment airlocks be leak tested at the peak calculated accident pressure (Pa) at six - month intervals. Further, should the air locks be opened during such intervals, the airlocks will be leak tested after each opening. Appendix J calls out these specific requirements for airlocks, because they represent a potentially large leakage path that is more subject to human error than other isolation barriers.

The objectives of the airlock leak testing requirements are (1) that the six month test will provide an integrated leakage rate for the entire airlock assembly, including electrical and mechanical penetrations, the airlocks cylinder, hinge assemblies, welded connections, and other potential leakage paths; and (2) that the "after each opening" test will provide a means of assuring that the door seals have not been damaged or seated improperly during airlock use.

For those operating facilities that were designed and constructed prior to the issuance of Appendix J, consideration has been given to the alternatives to the specific testing requirements which will meet the provisions of Appendix J. Listed below are a number of guidelines which may be useful when considering or revising current airlock leak testing programs.

1. At six month intervals, the entire airlock assembly shall be leak tested at the peak pressure, Pa. If the test pressure will lift the inner airlock door off its seat, strongbacks or other mechanical devices should be used so that meaningful test results can be obtained at Pa.
2. Should the airlock be opened during the interval between the six month tests, the airlock door seals shall be leak tested within 72 hours of every first of a series of openings. This relaxation in the "after each opening" test requirement of Appendix J recognizes that a significant amount of time is required to conduct these intermediate tests in relation to the frequency of use of the airlock. These tests would be conducted whenever containment integrity is required.
3. For those plants which require the use of strongbacks or clamps to leak test the door seals at a pressure Pa, a lower pressure (e.g., manufacturer's recommended pressure, which would not require the use of such clamping devices) should be used to conduct the intermediate tests. The results of leakage tests at the lower pressure shall be conservatively extrapolated to a leakage rate at the accident pressure Pa to determine acceptability.

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4. In lieu of the intermediate tests, an acceptable alternative would be the use of a continuous monitoring system. As in the case of reduced pressure intermediate tests, it must be demonstrated that the leakage rate using a continuous pressurized monitoring system is sufficiently sensitive, and can and will be conservatively extrapolated to the leakage rate that would be experienced under accident conditions (i.e., at a pressure of Pa).