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 MECREDY, R.C. Rochester Gas & Electric Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 JOHNSON, A.R. Project Directorate I-1 (PD1-1) (Post 941001)

SUBJECT: Requests one-time exemption from 10CFR50, App J, re performance of Type C testing during 1995 refueling outage. Licensee feels that containment isolation valves do not need to be tested for leakage based upon past testing.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

March 15, 1995

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-1
Washington, D.C. 20555

Subject: Application for Exemption from 10 CFR 50, Appendix J
Rochester Gas & Electric Corporation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

References: (a) Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject:
"Application for Amendment to Facility Operating License,
Containment Isolation Valve Testing Frequency," dated March
13, 1995.

(b) Federal Register, Volume 60, page 9634, February 21, 1995.

Dear Mr. Johnson,

In accordance with 10 CFR 50.12, section (a)(2)(ii), RG&E hereby applies for a one-time exemption from 10 CFR 50, Appendix J. This exemption request addresses two parts of 10 CFR 50, Appendix J, section III.D.3. First, RG&E requests an exemption from performing Type C testing during the 1995 refueling outage except for containment isolation valves which have maintenance performed on them or valves which have not demonstrated acceptable leakage during their previous two leakage tests. Second, RG&E requests an exemption from performing Type C tests for 129 containment isolation valves to allow an interval greater than 2 years between leakage tests. The technical specification changes which necessary are to support this exemption request are provided separately in Reference a.

Background information, the basis for the request, technical justification, and a safety evaluation of this application for exemption from 10 CFR 50, Appendix J, are provided in Attachment A. This attachment demonstrates that the requested exemption does not represent an undue risk, avoids performance of leakage tests on valves which have previously demonstrated acceptable leak tightness, and is otherwise in the public interest. The exemption request is also consistent with the recently proposed new Appendix J rule (Ref. b). The estimated savings from not having to perform these Type C tests during the 1995 refueling outage is approximately \$80,000 which includes a 1 person-rem reduction in personnel exposure.

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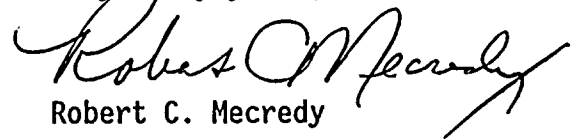
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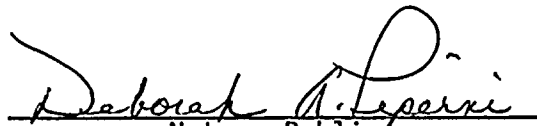
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Since R&GE expects to exit Cold Shutdown conditions following the 1995 refueling outage on April 27, 1995, we request NRC approval two weeks prior to this date, April 13, 1995 in order to allow RG&E to plan adequate resources to perform the required Type C testing if this exemption request will not be granted.

Very truly yours,


Robert C. Mecredy

Subscribed and sworn to before me
on this 15 day of March 1995.


Notary Public

DEBORAH A. PIPÉRNI
Notary Public in the State of New York
ONTARIO COUNTY
Commission Expires Nov. 23, 19...95

MDF\731

xc: U.S. Nuclear Regulatory Commission
Mr. Allen R. Johnson (Mail Stop 14B2)
PWR Project Directorate I-1
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Region I
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King of Prussia, PA 19406

Ginna Senior Resident Inspector



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Attachment A

R.E. Ginna Nuclear Power Plant

Application for Exemption from 10 CFR 50, Appendix J

This attachment provides a description of the requested exemption and the necessary justification. The attachment is divided into six sections. Section A describes the requested exemption from 10 CFR 50, Appendix J while Section B provides background information associated with the exemption request. Sections C and D present the bases for the request with respect to 10 CFR 50.12 and the technical justification, respectively. A safety evaluation of the exemption request is provided in Section E with a summary presented in Section F. Section G lists all references used in this attachment.

A. DESCRIPTION OF EXEMPTION REQUEST

RG&E requests a one-time exemption from 10 CFR 50, Appendix J. Section III.D.3 of 10 CFR 50, Appendix J states as follows:

Type C tests shall be performed during each reactor shutdown for refueling but in no case at intervals greater than 2 years.

RG&E requests an exemption from performing Type C testing during the 1995 refueling outage except for containment isolation valves which have maintenance performed on them or valves which have not demonstrated acceptable leakage during their previous two leakage tests. RG&E also requests an exemption from performing Type C tests for 129 containment isolation valves to allow an interval greater than 2 years between leakage tests (see Note 4 to attached table). The interval between tests for these 129 valves would exceed 2 years by no more than 1 month (i.e., a maximum testing interval from 3/10/94 to 4/10/96).

B. BACKGROUND

On February 21, 1995, the NRC published a proposed revision to 10 CFR 50, Appendix J for public comment (Ref. 1). The proposed revised rule would provide an option for containment leakage testing which is predicated on using performance based acceptance criteria. As such, containment leakage testing frequencies would be developed based on the results of previous tests instead of the current prescriptive frequencies which are now provided in 10 CFR 50, Appendix J. This change is being proposed as a result of extensive industry and NRC evaluations of the actual containment leakage testing results in the nuclear power industry which demonstrates that the current prescriptive testing frequencies are marginal to safety and that a performance based leakage test program is acceptable, and in many ways, preferable. The proposed rule is supported by a draft regulatory guide (Ref. 2) and various industry guidance documents (Refs. 3 and 4). The rule is anticipated to be issued in the fall of 1995.

The current (and proposed) 10 CFR 50, Appendix J is organized based on three types of tests: Type A, Type B, and Type C. Type A tests refer to the overall containment integrated leakage rate. Type B tests refer to those containment penetrations which use isolation barriers that incorporate resilient seals, gaskets, sealant compounds, bellows, or flexible metal seal assemblies. Type C tests refer to containment isolation valves. The last Type A test performed at Ginna Station was in April 1993 during the 1993 refueling outage. In general, the last Type B and C tests performed at Ginna Station were during the 1994 refueling outage between the dates of March 6th and April 8th (i.e., the last Type B and C tests for all penetrations were done on or after March 10, 1994).

This exemption request proposes to defer Type C testing for most containment isolation valves that would normally be required to be tested during the 1995 refueling outage. These containment isolation valves would be tested during the 1996 refueling outage at which time Type A, B, and C tests will all be performed. These three tests cannot be postponed beyond the 1996 refueling outage since RG&E will be replacing steam generators during this outage which requires breaching the containment structure and liner in order to remove and install the steam generators. The 1996 refueling outage is currently scheduled to begin on March 31, 1996 with Cold Shutdown reached on April 1, 1996.

For the 1995 refueling outage, RG&E anticipates that Ginna Station will leave Cold Shutdown on April 27, 1995 at which time containment integrity is required by technical specification LCO 3.6.1. Since Type C testing is required to ensure containment integrity is available, this exemption request must be in place prior to going above Cold Shutdown conditions. To provide for the potential of some required Type C tests, RG&E requests approval two weeks prior to this date, April 13, 1995.

C. BASIS FOR EXEMPTION

The proposed exemption request meets the criteria for special circumstances as described in 10 CFR 50.12 (a)(2)(ii) since application of Section III.D.3 of 10 CFR 50, Appendix J for the existing circumstances at Ginna Station is not necessary to achieve the underlying purpose of the rule. The purpose of 10 CFR 50 Appendix J is presented in Section I of the rule as follows:

These test requirements provide for preoperational and periodic verification by tests of the leak-tight integrity of the primary reactor containment, and systems and components which penetrate containment of water-cooled power reactors, and establish the acceptance criteria for such tests. The purposes of these tests are to assure that (a) leakage through the primary reactor containment and systems and components penetrating primary containment shall not exceed allowable leakage rate values as specified in the technical specifications or associated bases and (b) periodic surveillance of reactor containment penetrations and isolation valves is performed so that proper maintenance and repairs are made during the service life of the containment, and systems and components penetrating primary containment.

As discussed above in Section A, Section III.D.3 of 10 CFR 50, Appendix J requires that all containment isolation valves be tested every refueling outage but with an interval between tests not to exceed 2 years. Ginna Station is currently on 12 month refueling cycles such that all containment isolation valves are nominally tested every 12 months. Other nuclear power plants with longer operating cycles (e.g., 18 to 24 months) are allowed longer time intervals between tests as long as the time interval is less than 2 years. As such, approximately 22 Type C tests have been performed at Ginna Station since 10 CFR 50, Appendix J was first published in 1973. This is twice as many as would have been required by 10 CFR 50, Appendix J if Ginna Station were on 24 month cycles during this time frame.

Deferring leakage testing of containment isolation valves from the 1995 refueling outage to the 1996 refueling outage, and extending the time interval between tests to 2 years, 1 month for certain valves does not invalidate the overall purpose of 10 CFR 50, Appendix J. The Ginna Station technical specifications (and 10 CFR 50, Appendix J) restrict the total containment isolation valve leakage rate to $< 0.6 L_a$ which is not affected by this exemption request. As such, the acceptance criteria for the leakage tests as used in the accident analyses remain unaffected.

The testing history and structural capability of the containment establish that Ginna Station has previously had acceptable containment leakage rates and that there has typically been little change between tests. All containment isolation valves have been assigned administrative leakage limits which are based on a ratio of the nominal valve diameter with respect to the sum total of all valve diameters. This prevents any one valve from dominating the overall leakage rate. The current as-left Type B and C leakage is 13,858.9 cc/min when measured on a maximum path leakage rate basis and 2,559.3 cc/min when measured on a minimum path leakage rate basis. These correspond to 61% and 11%, respectively of the allowed $0.60 L_a$ leakage rate of 22,700 cc/min. The as-left Type A leakage rate is 0.05387 wt%/day or 35% of L_a (i.e., 0.1528 wt%/day). Therefore, the ability of containment to mitigate the consequences is still maintained with a large available margin. Requiring leakage testing during the 1995 refueling outage will result in approximately a 1 person-rem exposure, and require the removal of systems which normally would be available for any accident mitigation function (e.g., charging). The estimated savings from not performing these Type C tests is approximately \$80,000 based on manpower savings which can then be used to support other required testing. This estimate does not include any cost savings incurred as a result of reducing the outage length which can be expected to occur due to a reduction in potential critical path activities.

In addition, several containment isolation valves will not exceed the maximum time between tests of 2 years as currently allowed by 10 CFR 50, Appendix J. For the remaining valves, a one-time extension of 1 month is of negligible risk impact since it represents approximately 4% of the total interval. Requiring a shutdown strictly to perform Type C leakage tests prior to exceeding 2 years between tests is not in the public best interest since Ginna Station represents approximately 40% of the base load for RG&E. Also, performing this test would result in unnecessary personnel exposures and a thermal transient to the plant.

This exemption request does not affect the periodic schedule for Type A and B tests which will continue to be performed in accordance with technical specifications, Appendix J and approved exemptions.

D. TECHNICAL JUSTIFICATION

The proposed new 10 CFR 50, Appendix J rule (Ref. 1) was developed based on a detailed review of previous industry experience with performing Type A, B, and C testing. This review concluded that it was acceptable to base testing intervals on the performance of the containment systems and structures instead of prescribing specific testing intervals. Draft Regulatory Guide DG-1037 (Ref. 2) endorses an industry standard (Ref. 3) as being an acceptable performance based leak testing program approach which may be used to implement the proposed new rule. This industry standard states that the interval between Type C tests may be extended from 24 to 60 months provided the successful completion of two consecutive leakage tests. The exemption request documented in this attachment is to extend the time between Type C tests from 12 months to at most 25 months provided the successful completion of two consecutive leakage tests. As such, the proposed exemption request is conservative and well within the guidelines of the proposed new Appendix J rule and supporting guidance documents. A similar exemption has also been granted for a plant on a 12 month refueling cycle (Ref. 5).

Attachment B provides a listing of the containment isolation valves (and barriers) subject to the Type C testing at Ginna Station. The table lists the administrative leakage limit of each valve, the date of its last leakage test, and the leakage test results since 1991. As can be seen, only 12 of 151 valves do not meet the criteria of two consecutive successful leakage tests to administrative limits such that they would require testing during the 1995 refueling outage. Therefore, it can be concluded that there is a negligible risk increase with the proposed exemption request based on our previous testing experience.

E. SAFETY EVALUATION

The proposed exemption request as discussed above has been evaluated with respect to the accident analyses as follows:

There is no increase in the probability or consequences of an accident or malfunction of equipment important to safety previously evaluated in the UFSAR related to this request. There is no impact to initiators of analyzed events since the containment isolation system provides a mitigation function. The containment remains capable of performing its intended safety function since previous leakage testing has confirmed the acceptability of the Type C tested containment penetrations. The proposed extension of the time between leakage tests is also well within the industry guidance proposed to support the new 10 CFR 50 Appendix J rule.

The possibility of a new or different kind of accident or a malfunction of a different type than previously evaluated in the UFSAR is not created by the proposed change. The containment isolation valves are still required to be tested to ensure containment integrity can be met above Cold Shutdown; only the testing frequency is being revised. There is also no physical modification to the plant or a change to normal operational procedures required to support the extension request.

There is no reduction in the margin of safety as defined in the basis for any Technical Specification. The necessary changes to the Ginna Station Technical Specifications have been submitted separately (Ref. 6).

F. SUMMARY

In summary, the proposed exemption request meets the special circumstances of 10 CFR 50.12 since:

- a. Application of Section III.D.3 of 10 CFR 50, Appendix J in this particular circumstance would not serve the underlying purpose of the rule. The rule provides for the assurance of a leak tight containment system to mitigate the consequences of an accident. The past leak rate test data and available margin to that allowed by technical specifications provide the necessary assurance that the purpose of the rule is being fulfilled.
- b. Compliance with the rule would cause undue hardship in that requiring testing on an annual basis as a result of 12 month refueling cycles subjects personnel to unnecessary personnel exposures and requires the removal of systems which normally would be available for an accident mitigation function during an outage. Also, a forced outage for the purpose of testing those valves which would have an interval between testing of greater than 2 years would result in subjecting the plant to an unnecessary thermal transient.

Based on the above, the requested exemption to 10 CFR 50, Appendix J has been justified, does not involve an unreviewed safety question, and will not adversely affect or endanger the health and safety of the general public.

G. REFERENCES

1. Federal Register, Volume 60, page 9634, February 21, 1995.
2. Regulatory Guide DG-1037, "Performance-Based Containment Leak Test Program," Draft.
3. NEI 94-01, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," Draft, Revision D.
4. ANSI/ANS-56.8-1994, "American National Standard for Containment System Leakage Testing Requirements."
5. Letter from D.M. Crutchfield, NRC, to G.C. Sorensen, Washington Public Power Supply System, Subject: "Issuance of Exemption to a Provision of Appendix J and Amendment No. 41 to Facility Operating License No. NPF-21, WPPSS Nuclear Project No. 2 (TAC No. 60740)," dated April 29, 1987.
6. Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: "Application for Amendment to Facility Operating License, Containment Isolation Valve Testing Frequency," dated March 13, 1995.

ATTACHMENT B

Table of Containment Isolation Barriers
Subject to Type C Testing

TYPE C CONTAINMENT BARRIERS									
VALVE	PEN #	ADMIN LEKAGE (CCs/MIN)	RETEST IN 1995?	LAST TEST DATE	1995 RESULTS	1994 ⁽³⁾ RESULTS	1993 ⁽³⁾ RESULTS	1992 ⁽³⁾ RESULTS	1991 ⁽³⁾ RESULTS
AOV-200A	112	111.0		4/3/94		0	0	0	13.3
AOV-200B	112	111.0		4/3/94		0	0	0	13.3
AOV-202	112	111.0		4/3/94		0	0	0	13.3
CV-304A	106	166.5		3/20/94		50	0	40	4.2
CV-304B	110A	166.5		3/20/94		100	0	81.4	9.1
MOV-313	108	166.5		3/27/94		0	0	0	32.5
CV-370B	100	166.5		3/20/94		20	10	0	12.8
AOV-371	112	111.0	Y	4/3/94		660	0	0	0
CV-383B	102	166.5		3/12/94		0	20	13	0
AOV-508	121A	111.0		3/10/94		0	0	75	5
CV-528	121B	166.5		3/10/94		0	0	0	0
CV-529	121A	166.5		3/10/94		0	3	49	5
AOV-539	120B	20.8		3/10/94		0	0	2.6	1.1
V-546	120B	20.8		3/10/94		0	2.4	2.6	1.1
V-547	121B	41.6		3/10/94		0	20	352	110
CV-743	124A	166.5		3/20/94		0	15	0	71
AOV-745	124C	111.0		3/20/94		10	20	20	5
MOV-749A	127	166.5		3/30/94		0	20	0	95
MOV-749B	128	166.5		4/1/94		0	0	0	2
MOV-759A	126	166.5		3/30/94		0	21.6	0	50
MOV-759B	125	166.5		3/30/94		5	0	90	20

TYPE C CONTAINMENT BARRIERS									
VALVE	PEN #	ADMIN LEKAGE (CCs/MIN)	RETEST IN 1995?	LAST TEST DATE	1995 RESULTS	1994 ⁽³⁾ RESULTS	1993 ⁽³⁾ RESULTS	1992 ⁽³⁾ RESULTS	1991 ⁽³⁾ RESULTS
MOV-813	131	333.0		3/31/94		0	90	0	20
MOV-814	130	333.0		3/31/94		0	90	0	0
AOV-846	120A	55.5		3/29/94		30	27.5	0	6.8
CV-862A	105	499.5		3/18/94		0	20	3.8	5
CV-862B	109	499.5		4/8/94		1.0	35	54	61
V-869A	105	41.6		3/18/94		0	0	30	--
V-869B	109	41.6		4/8/94		0	0	4.3	--
CV-870A	113	249.8		3/27/94		0	3	0	0
CV-870B	101	249.8		3/27/94		0	0	0	15
V-879	110B	41.6		3/27/94		0	3	0	0
V-885A	113	41.6		3/27/94		0	3	0	--
V-885B	101	41.6		3/27/94		0	0	0	--
CV-889A	113	249.8		3/27/94		1.7	0	5	5
CV-889B	101	249.8		3/27/94		1.1	20	3.5	90
SOV-921	332D	20.8		4/1/94		0	2	3	0
SOV-922	332A	20.8		4/1/94		0	2	1	5
PI-922A	113	20.8		3/27/94		0	2	0	--
PT-922	113	20.8		3/27/94		0	0	0	--
PT-922 END CAP	113	20.8		3/27/94		0	0	--	--
SOV-923	332B	20.8		4/1/94		3.0	1.9	4	3
PT-923	101	20.8		3/27/94		7.5	0	0	--
PI-923A	101	20.8		3/27/94		0	0	0	--
SOV-924	332A	20.8		4/1/94		0	0	1	5

TYPE C CONTAINMENT BARRIERS									
VALVE	PEN #	ADMIN LEKAGE (CCs/MIN)	RETEST IN 1995?	LAST TEST DATE	1995 RESULTS	1994 ⁽³⁾ RESULTS	1993 ⁽³⁾ RESULTS	1992 ⁽³⁾ RESULTS	1991 ⁽³⁾ RESULTS
PT-944	332C	20.8		8/11/94		0	0	0	0
PT-945	121C	20.8		3/18/94		0	0	0	0
PT-946	121C	20.8		3/18/94		0	0	0	0
PT-947	203A	20.8		3/17/94		0	0	0	0
PT-948	203A	20.8		3/17/94		0	0	0	0
PT-949	332C	20.8		8/11/94		0	0	0	0
PT-950	332C	20.8		8/11/94		0	0	0	0
V-956D	205	20.8	Y ⁽¹⁾	4/5/94		0	7.4	0	1.1
V-956E	206A	20.8		3/2/95	0	0	4.6	4.3	0
V-956F	207A	20.8		3/2/95	0	0	4.1	0	0
AOV-966A	207A	20.8	Y	3/2/95	610	0	7	0	0
AOV-966B	206A	20.8		11/9/94	0	10	29	25.9	0
AOV-966C	205	20.8		4/5/94		10	6	0	1.1
AOV-1003A	143	166.5		3/24/94		0	0	0	0
AOV-1003B	143	166.5		3/24/94		0	0	160	0
V-1076A	304A	55.5		3/21/94		0	20	9.5	2
V-1076B	202A	55.5		3/15/94		0	0	0	3.9
V-1080A	210	55.5		4/2/94		15	0	18	9.1
V-1084A	304B	55.5		3/21/94		0	0	0	0
V-1084B	202B	55.5		3/15/94		0	0	0	0
V-1554	305A	41.6		4/1/94		5	0	10	4.5
V-1555	305A	20.8		4/1/94		0	0	0	--
V-1556	305A	41.6		4/1/94		12	0	230	5
V-1557	305C	41.6		4/1/94		5	0	4	0

TYPE C CONTAINMENT BARRIERS									
VALVE	PEN #	ADMIN LEAKAGE (CCs/MIN)	RETEST IN 1995?	LAST TEST DATE	1995 RESULTS	1994 ⁽³⁾ RESULTS	1993 ⁽³⁾ RESULTS	1992 ⁽³⁾ RESULTS	1991 ⁽³⁾ RESULTS
V-1558	305C	20.8		4/1/94		0	0	0	--
V-1559	305C	41.6		4/1/94		0	0	0	0
V-1560	305D	41.6		4/1/94		0	0	6	0
V-1561	305D	20.8		4/1/94		0	0	0	--
V-1562	305D	41.6		4/1/94		0	0	5.5	0
V-1563	203B	41.6		3/15/94		0	0	0	0
V-1564	203B	20.8		3/15/94		0	0	0	--
V-1565	203B	41.6		3/15/94		0	0	0	0
V-1566	203C	41.6		3/15/94		0	0	0	0
V-1567	203C	20.8		3/15/94		0	0	0	--
V-1568	203C	41.6		3/15/94		0	0	0	0
V-1569	124D	41.6		3/31/94		0	0	0	0
V-1570	124D	20.8		3/31/94		0	0	0	--
V-1571	124D	41.6		3/31/94		0	0	0	0
V-1572	124B	41.6		3/31/94		6	0	0	0
V-1573	124B	20.8		3/31/94		0	0	0	--
V-1574	124B	41.6		3/31/94		0	0	0	0
V-1596	305E	55.5	Y	4/3/94		35	248	400	23
A0V-1597	305E	55.5		4/3/94		0	20	20	9
A0V-1598	305B	55.5		4/3/94		0	16	0	5
A0V-1599	305B	55.5		4/3/94		0	0	0	5
V-1655	123A	20.8		3/30/94		0	1	1	0
V-1709G	143	41.6		3/24/94		0	0	0	--
CV-1713	129	83.3		3/30/94		71	27	20	32.5

TYPE C CONTAINMENT BARRIERS									
VALVE	PEN #	ADMIN LEKAGE (CCs/MIN)	RETEST IN 1995?	LAST TEST DATE	1995 RESULTS	1994 ⁽³⁾ RESULTS	1993 ⁽³⁾ RESULTS	1992 ⁽³⁾ RESULTS	1991 ⁽³⁾ RESULTS
AOV-1721	143	166.5		3/24/94		0	0	15	64
V-1722	143	166.5		3/24/94		0	0	0	0
AOV-1723	107	166.5		3/24/94		0	0	72	61
AOV-1728	107	166.5		3/24/94		0	0	75	0
AOV-1786	129	55.5		3/30/94		8	1.5	69	11.2
AOV-1787	129	55.5		3/30/94		6.5	1	68	11.6
AOV-1789	123A	41.6		3/30/94		0	0	0	0
V-1793	129	55.5		3/30/94		5.5	17	2.9	9.4
MOV-1813A	141	333.0	Y ⁽¹⁾	3/24/94		0	0	0	0
MOV-1813B	142	333.0	Y ⁽¹⁾	3/27/94		0	0	0	0
V-1819A	121C	20.8		3/18/94		0	0	0	0
V-1819B	121C	20.8		3/18/94		0	0	0	0
V-1819C	203A	20.8		3/17/94		0	0	0	0
V-1819D	203A	20.8		3/17/94		0	0	0	0
V-1819E	332C	20.8		8/11/94		0	8	0	0
V-1819F	332C	20.8		8/11/94		0	0	0	0
V-1819G	332C	20.8		8/11/94		0	0	0	0
V-2825	105	41.6		3/18/94		0	0	0	--
V-2825A	105	41.6		3/18/94		0	0	0	--
V-2826	109	41.6	Y	4/8/94		0	970	0	--
V-2826A	109	41.6		4/8/94		0	0	0	--
V-2856	105	20.8		3/18/94		0	0	0	--
V-2858	109	20.8		4/8/94		0	0	0	--

TYPE C CONTAINMENT BARRIERS									
VALVE	PEN #	ADMIN LEAKAGE (CCs/MIN)	RETEST IN 1995?	LAST TEST DATE	1995 RESULTS	1994 ⁽³⁾ RESULTS	1993 ⁽³⁾ RESULTS	1992 ⁽³⁾ RESULTS	1991 ⁽³⁾ RESULTS
V-5129	103	111.0		3/11/94		0	20	10.8	0
AOV-5392	310A	111.0		3/13/94		0	18	0	2
CV-5393	310A	166.5		3/13/94		0	0	1900	630
V-6151	301	111.0	Y ⁽²⁾	3/15/94		8350	233	0	20
V-6152	303	111.0	(2)	3/15/94		0	3.4	12	0
V-6165	301	111.0	(2)	3/15/94		0	0	0	0
V-6175	303	111.0	(2)	3/15/94		0	0	0	0
V-7141	310B	111.0		4/1/94		0	50	18	22
CV-7226	310B	166.5		4/1/94		10	16	25	8.2
AOV-7445	309	333.0		3/30/94		0	0	0	0
V-7448	332D	20.8		4/1/94		0	0	0	0
V-7448 CAP	332D	27.8		4/1/94		0	0	0	--
V-7452	332A	20.8		4/1/94		0	0	0	5
V-7452 CAP	332A	27.8		4/1/94		0	0	0	--
V-7456	332B	20.8		4/1/94		0	0	0	--
V-7456 CAP	332B	27.8		4/1/94		0	0	0	--
AOV-7478	309	333.0		3/30/94		0	0	74	0
AOV-7970	132	333.0		3/14/94		0	0	15	0
AOV-7971	132	333.0		3/14/94		290	130	15	0
AOV-8418	324	111.0		4/3/94		0	25	20	0
CV-8419	324	166.5		4/3/94		49	50	163	5.1
CV08623	120A	83.3		3/29/94		59	0	0	1014
AOV-9227	307	222.0	Y	4/1/94		500	16	340	400
CV-9229	307	333.0		4/1/94		15	3	0	0

TYPE C CONTAINMENT BARRIERS									
VALVE	PEN #	ADMIN LEAKAGE (CCs/MIN)	RETEST IN 1995?	LAST TEST DATE	1995 RESULTS	1994 ⁽³⁾ RESULTS	1993 ⁽³⁾ RESULTS	1992 ⁽³⁾ RESULTS	1991 ⁽³⁾ RESULTS
10205S1	304A	55.5		3/21/94		45	31.4	168	10.9
10209S1	304B	55.5		3/21/94		0	0	33	0
10211S1	202A	55.5		3/15/94		0	0	10	4.8
10213S1	202B	55.5	Y	3/15/94		130	735	1120	35
10214S1	210	55.5	Y	4/2/94		25	400	0	22
10215S1	210	55.5	Y	4/2/94		25	400	300	22
V-12406	113	20.8		3/27/94		0	0	0	--
V-12407	101	20.8		3/27/94		7.5	0	0	--
FIRE SW PIPE CAP	103	111.0		3/11/94		0	0	0	0
MINI-PURGE EXHAUST CAP	132	11.8		3/14/94		0	0	0	--
A H2 MONITOR CABINET	332D	100		4/1/94		60.3	86	73.3	2.3
B H2 MONITOR CABINET	332B	100		4/1/94		20	13	1	9.5

NOTES:

(1) VALVE FAILED FIRST LEAKAGE TEST IN 1994 (LEAKAGE IN COLUMN FOR 1994 RESULTS IS FOR SECOND TEST).

(2) THE PENETRATION IS TO BE DECOMMISSIONED DURING 1995 REFUELING OUTAGE.

(3) RESULTS ARE IN CCs/MIN

(4) TOTALS FROM TABLE:

CONTAINMENT BARRIERS (VALVES, END CAPS, AND CLOSED SYSTEMS) SUBJECTED TO TYPE C TESTS: 151

MINUS FOUR VALVES FOR PENETRATIONS 301 AND 303 (V-6151, V-6152, V-6165, and V-6175) WHICH ARE TO BE DECOMMISSIONED: 147

TYPE C CONTAINMENT BARRIERS LAST TESTED BETWEEN 3/10/94 AND 4/10/94 (DOES NOT INCLUDE PENETRATIONS 301 & 303): 139

MINUS 10 VALVES TO BE TESTED IN 1995 DUE TO PREVIOUS UNACCEPTABLE LEAKAGE (DOES NOT INCLUDE AOV-966A SINCE IT WAS LAST TESTED ON 3/2/95 AND V-6151 SINCE PENETRATION IS BEING DECOMMISSIONED): 129