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October 21, 1994
PY-CEI/NRR-1650L

U. S. Nuclear Regulatory Commission
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Perry Nuclear Power Plant
Docket No. 50-440
License Amendment Request:
10 CFR 50 Appendix J
Clarifications Within the Primary
Containment Leakage Specification

Gentlemen:

Enclosed is a request for amendment of the Facility Operating License (NPF-58), Appendix A, Technical Specifications for the Perry Nuclear Power Plant (PNPP), Unit 1.

This License Amendment request proposes changes to the PNPP Technical Specifications primarily to clarify the Limiting Conditions for Operation and the Action statements for Specification 3.6.1.2, "Primary Containment Leakage," regarding the applicable 10 CFR 50 Appendix J exemptions for the main steam line isolation valves. Also, several other changes are proposed within Surveillance Requirement 4.6.1.2 related to the requirements for Type A Integrated Leak Rate Tests.

In conjunction with the Technical Specification changes proposed herein, a parallel request for exemptions from several requirements of 10 CFR 50 Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors" is also being submitted (see letter PY-CEI/NRR-1651L, dated October 21, 1994). The requested exemptions should be issued prior to or concurrent with the proposed Technical Specification changes. Also, issuance of the exemptions is requested prior to issuance of the Improved Technical Specifications for PNPP, Unit 1, due to the reformatting of the primary containment leakage requirements.

Attachment 1 provides the Summary, Safety Assessment, Description of the Proposed Changes, and the Environmental Consideration. Attachment 2 provides a copy of the marked-up Technical Specification and Bases pages. Attachment 3 provides the Significant Hazards Consideration.

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If you have questions or require additional information, please contact
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Very truly yours,



RAS:RMC:sc

Attachments

cc: NRC Region III Regional Director
NRC Resident Inspector
NRC/NRR Project Manager
State of Ohio

SUMMARY

This License Amendment request proposes several clarifications and changes to Technical Specification (TS) 3.6.1.2, "Primary Containment Leakage" to reflect exemptions to the Type A and C testing requirements of 10 CFR 50 Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors." The following clarifications/changes are proposed:

- A) Add "except for the main steam line isolation valves" and a superscript "#" to Limiting Condition for Operation (LCO) 3.6.1.2.a and Action 3.6.1.2.a, and a superscript "#" to LCO 3.6.1.2.b, and to Action 3.6.1.2.b, to clarify that the main steam line isolation valve leak rates are exempted i) from inclusion in the overall integrated primary containment leak rate (or Type A test total), ii) from inclusion in the combined local leak rate summation (0.6 L for Type B and C testing), and to clarify that the main steam lines are not required to be vented and drained for Type A testing. The main steam line isolation valve leakage is accounted for separately in LCO 3.6.1.2.c. Formal exemption from the applicable acceptance criteria (Paragraphs III.A.5(b)(2), III.B.3, III.C.3, and III.A.1(d)) of 10 CFR 50 Appendix J to accommodate this proposed change is being requested in a separate letter to reflect the accepted PNPP methods and practices related to main steam line isolation valve leakage and leak rates.
- B) Within Surveillance Requirement (SR) 4.6.1.2, maintain the requirement to perform Type A testing in conformance with the criteria specified in Appendix J, while deleting unnecessary references to two industry Standards which are directly referenced within Appendix J, and clarify the test durations for which the use of Bechtel Corporation Topical Report BN-TOP-1 is applicable.
- C) Remove the second sentence of Surveillance Requirement 4.6.1.2.a requiring that the third test of each set of containment ILRTs be conducted during the shutdown for the 10-year plant inservice inspection. An exemption to Paragraph III.D.1(a) of 10 CFR 50 Appendix J is being submitted in a separate letter to decouple performance of the third ILRT (in each 10-year service period) from having to be performed during the same outage as the 10-year plant inservice inspection.

As cited above, in conjunction with this TS change request, exemptions to several portions of 10 CFR 50 Appendix J are being requested for item A and item C, above, within letter PY-CEI/NRR-1651L dated October 21, 1994.

SAFETY ASSESSMENT

Part A - Formalize the Approval for Excluding the Main Steam Line Isolation Valve Leakages from Inclusion in i) the Overall Integrated Primary Containment Leak Rate and ii) the Combined Local Leak Rate, and Clarify that the Main Steam Lines are Not Required to be Vented and Drained for Type A Testing

The primary objective of 10 CFR 50 Appendix J is to specify an acceptable methodology for testing the primary containment and, through this testing, determine the leakage rate is within the acceptance criteria cited in the licensing basis in order to verify that it is capable of maintaining its leak-tight integrity during normal and post-accident conditions. Leakage rate acceptance criteria are based on leakage rate assumptions used in calculation of total radiological consequences for 10 CFR 100. Since Appendix J was originally envisioned, alternative means of meeting the intent of these requirements have been developed. These alternatives provide an equivalent level of protection of the public health and safety. Since some of these alternatives deviate from the specific wording of Appendix J, exemptions are appropriate for these alternatives. Specifically, implicit in the Final Safety Analysis Report (FSAR) treatment of the main steam line leakage, as well as in the TS requirements for main steam line leakage, are deviations from several requirements of 10 CFR 50 Appendix J associated with Type A and C leakage rate testing. Although PNPP's methods and practices for Appendix J testing have been previously described in correspondence to the NRC dated July 26, 1985 (letter PY-CEI/NRR-0292L, M. R. Edelman (CEI) to B. J. Youngblood (NRC)), formal approval of exemptions to Appendix J were not requested. Recently, however, it was recognized that due to the NRC Staff legal interpretation described within the NRC Inspection and Enforcement Manual, Part 9900: "CFR Discussions, Containment Integrated Leak Rate Testing", and due to the specific wording of Appendix J, a formal exemption is appropriate to document the approval (i.e., issuance of the PNPP TS) previously received. An exemption, therefore, is being formally requested to Paragraphs III.A.5(b)(2), III.B.3 and III.C.3, and III.A.1(d) of 10 CFR 50 Appendix J. Detailed justifications for the need and appropriateness of the exemption to these paragraphs of Appendix J is provided below and a formal request for this exemption is being submitted within a separate letter, PY-CEI/NRR-1651L, this date.

10 CFR 50 Appendix J implies that the overall integrated primary containment leak rate consists of the leakage through all the primary containment penetrations. No allowance is currently provided within Appendix J for alternative means to address leakage pathways having different leakage treatment provisions (and resulting radiological effects) than those considered at the time Appendix J was envisioned. However, with respect to leakage from the main steam lines, PNPP utilizes the criteria described in the Standard Review Plan, Section 15.6.5, Appendix D, "Radiological Consequences of a Design Basis Loss-of-Coolant Accident: Leakage from Main Steam Isolation Valve Leakage Control System", (Rev. 1 - July 1981). The assumptions used in the PNPP FSAR in computing the total radiological consequences from a hypothetical LOCA include separate contributions for the containment leak rate and the main steam line isolation valve leak rate. The value for the maximum allowable containment leak rate, L_c of 0.2%/day, was established based on this separate accounting for the main steam line isolation valve leak rate. The

allowable value for the main steam line isolation valve leak rate of 25 standard cubic feet per hour/steamline is a separate and distinct requirement which was incorporated in the PNPP TS during initial PNPP licensing. The contributions for each leak rate are explicitly described in the PNPP FSAR as well as the NRC's Safety Evaluation Report (SER) (NUREG-0887). This alternative NRC approved method for assessing the main steam line isolation valve leakage contribution and determining the radiological consequences was developed after issuance of 10 CFR 50 Appendix J, and consequently Appendix J does not explicitly recognize the approach presented therein. Therefore, based on the separate treatment of the main steam line isolation valve leakage from the rest of the containment leakage, an exemption to various requirements of 10 CFR 50 Appendix J is necessary.

The first Appendix J requirement (from item A(i) cited above) for which an exemption is sought to reinforce the methodology and approval cited in the PNPP licensing basis is Paragraph III.A.5(b)(2). Therein it is stated that "The leakage rate L_{am} shall be less than $0.75 L_a$." The inference of these words is that this limit would apply to all leakage paths including the main steam lines. At PNPP however, the separate treatment of main steam line leakage is considered within the PNPP licensing basis, since within Section 15.6.5.5.1.2.a of the FSAR (and carried forward into the Updated Safety Analysis Report (USAR)) the following is stated, "The design basis leak rate of the primary containment and its penetrations (excluding the main steam lines) is 0.2 percent per day [emphasis added] for the duration of the accident", and within TS LCO 3.6.1.2.a, "an overall integrated leakage rate of less than or equal to $0.75 L_a$, 0.20 percent by weight of the primary containment air per 24 hours^a at P [emphasis added]" is specified. Thus, the same leakage limit for L_a was specified in both of these licensing basis documents, although the TS do not explicitly state that the overall integrated leakage rate of 0.20 percent per day does not include the main steam line isolation valve leakage fraction. The PNPP Unit 1 TS do however recognize the separate dose calculations for the main steam line leakage contribution by providing a distinct leakage limit just for these lines (see LCO 3.6.1.2.c). The NRC SER approving the PNPP design basis LOCA analysis also recognized the main steam line isolation valve leakage as a contribution separate from the 0.20 percent per day containment leakage contribution (see SSER 8, Table 15.2).

In order to make the Technical Specifications more clear on this point, it is proposed to add "except for the main steam line isolation valves" and a superscript "#" to LCO 3.6.1.2.a and Action 3.6.1.2.a clarify that the MSIVs are excluded from the overall integrated leak rate and to refer to a footnote which cites that an Appendix J exemption is associated with these requirements (see Attachment 2). The concept of using such a footnote to identify exemptions to Appendix J is consistent with the current BWR Standard Technical Specifications. The Bases are also proposed to be revised to explain that the main steam line isolation valve leak rates are exempted from inclusion in the overall integrated primary containment leak rate (see Attachment 2). A detailed description of these (and all of the following) proposed Technical Specification and Bases changes is provided in the "Description of the Proposed Changes" section of this letter.

The second portion of the exemption (from item A(ii) cited above) being sought to reinforce the methodology and approvals cited in the PNPP licensing basis

is to Paragraphs III.B.3 and III.C.3 of the regulation, which require that the combined local leak rate for all penetrations and all isolation valves, as measured during local leak rate tests (the LLRTs or Type B and Type C tests), meet the acceptance criterion of less than or equal to 0.60 of the maximum allowable containment leak rate (or L). The inference of these words is that this limit would apply to all penetrations including the main steam line penetrations. The separate treatment of main steam line isolation valve leakage is recognized within the PNPP licensing basis since within FSAR Table 6.2-40, Note 4 (and carried forward in the USAR), it was specified that "MSIV leakage is not included in the 0.60 L Type B and C test totals" (the combined local leak rate totals). Also, the PNPP Unit 1 TS issued by the NRC are clear on this separation; in addition to the separate leakage limit provided for the main steam lines in LCO 3.6.1.2.c, TS LCO 3.6.1.2.b states that the combined leakage rate limit shall be "less than or equal to 0.60 L for all penetrations and all valves, except for main steam line isolation valves...[emphasis added]".

Therefore, it is proposed to add a superscript "#" to LCO 3.6.1.2.b and to Action 3.6.1.2.b to refer to a footnote which clarifies that an Appendix J exemption is involved (see Attachment 2). The use of this footnote to identify this exemption is consistent with the current Standard Technical Specifications. It is also proposed to revise the Bases (see Attachment 2) to explain that the main steam line isolation valve leak rates are exempted from inclusion in the combined leakage rate.

The third portion of the exemption being sought to reinforce the methodology and approvals cited in the PNPP licensing basis is to Paragraph III.A.1(d) of Appendix J, which (in part) requires that, "Those portions of the fluid systems that are part of the reactor coolant pressure boundary and are open directly to the containment atmosphere under post-accident conditions and become an extension of the boundary of the containment shall be open or vented to the containment atmosphere prior to and during the test. ... All vented systems shall be drained of water or other fluids to the extent necessary to assure exposure of the system containment isolation valves to containment air test pressure...."

At PNPP, the containment ILRT is performed with the main steam lines filled with water between the inboard and outboard MSIVs to minimize leakage through this pathway during the Type A test. Filling these lines meets the objective of the regulation in that the filling removes the leakage pathway from the test, which is consistent with the PNPP design and accident analysis. Venting and draining the main steam lines to the containment atmosphere during a Type A test is not necessary to achieve the underlying purpose of the rule since: each main steam line penetration (the area between the inboard and outboard MSIVs, including the outboard MSIVs before seat drain lines) is Type C tested as required by this paragraph (Paragraph III.A.1(d)); this leakage is required to be less than the limit specified in TS LCO 3.6.1.2.c; and, this leakage contribution is separately addressed in the design basis LOCA radiological analyses.

During the initial licensing period, conversations were held with the NRC Staff to ensure it was understood that we did not intend to vent and drain the main steam lines to the containment atmosphere during the ILRTs, but instead intended to treat the main steam line penetration leakage separately.

Following this conversation, CEI submitted a letter (PY-CEI/NRR-0292L dated July 26, 1985) from M. R. Edelman (CEI) to B. J. Youngblood (NRC) clarifying the main steam line leak testing to be performed at the Perry Nuclear Power Plant in accordance with 10 CFR 50 Appendix J. This letter stated:

"The Perry Nuclear Power Plant Technical Specifications (Proof and Review Copy dated April 8, 1985) establish a separate leakage limit for main steam line isolation valves (MSIV's) in Section 3/4.6.1.2. To establish consistent leak testing in accordance with Appendix J, we are planning to conduct primary reactor containment leak rate testing (Type A) separately from MSIV testing (Type C). To accomplish this separation, the main steam lines will be water-filled between inboard and outboard MSIV's to prevent air leakage during the Type A test; MSIV's will be separately Type C tested in accordance with 10 CFR 50 Appendix J Paragraph III.A.1(d) and III.C.1 and 2.

The basis upon which CEI concludes this is acceptable primarily rests on the consistent separation of leakage terms in technical specifications, test performance, and offsite dose assessment."

This letter served two purposes related to the exemption being discussed herein; first, it clarified that the Type A overall containment leak rate test results and the Type C local leak rate test results for the main steam lines would be treated separately (see discussion above for the first and second portions of the exemption), and second, it clarified that CEI intended to water fill the main steam lines between the inboard and outboard MSIVs during the ILRT (relates to the third portion of the exemption being discussed here). In order to better clarify the third portion of the exemption within the PNPP licensing basis, it is proposed to revise the TS Bases to state that the main steam line penetrations do not require venting and draining during the ILRT (see Attachment 2).

Therefore, as previously described in the discussions for each of the affected Appendix J paragraphs, the concept that main steam line isolation valve leakage was to be treated separately from the other Type A and B/C leakages was recognized by and accepted by the NRC Staff at the time of licensing of the PNPP. However, due to the NRC Staff legal interpretation previously discussed, and the specific wording of Appendix J, it was subsequently recognized that a formal exemption for these issues would be more appropriate to document the approvals received in the initial licensing of PNPP, and to reflect the PNPP design basis. The formal exemption request submitted by letter PY-CEI/NRR-1651L for these paragraphs of 10 CFR 50 Appendix J should be issued prior to or concurrent with the proposed TS changes discussed herein.

Part B - Revise Surveillance Requirement 4.6.1.2 to Eliminate Unnecessary References and Clarify the Use of BN-TOP-1

The only containment Integrated Leak Rate Test method endorsed by the NRC within 10 CFR 50 Appendix J, Paragraph III.A.3(a) at the time of initial licensing (1985 time frame) of the PNPP was ANSI Standard N45.4-1972, "Leakage Rate Testing of Containment Structures for Nuclear Reactors", dated March 16, 1972. During that same time period, however, several other methods were being

used by various other licensees to calculate containment integrated leakage rates and were recognized by the NRC as being acceptable for use.

Within a letter to M. R. Edelman (CEI) from B. J. Youngblood (NRC), dated June 10, 1985, entitled: "Performance of the Preoperational Containment Integrated Leakage Rate Test - Perry Nuclear Power Plant, Unit 1", the NRC Staff found the CEI description of the performance of the containment ILRT portion of the Initial Test Program acceptable with the following clarification:

"The primary containment leakage rates shall be demonstrated at the test schedule to be stipulated in the plant Technical Specifications and shall be determined in conformance with the criteria specified in Appendix J of 10 CFR Part 50 using the methods and provisions of ANSI 45.4-1972 and BN-TOP-1; test results shall also be reported based on the Mass Point Methodology described in ANSI/ANS N56.8-1981" (underlined is the point of clarification).

The Staff also stated, "this clarification is being included in the Technical Specifications as shown in the enclosed draft page from the "Proof and Review" issue of the Perry Unit 1 Technical Specifications currently being finalized." Therefore, CEI was provided approval by the NRC staff to use ANSI Standard ANSI/ANS N56.8-1981, though it deviated from 10 CFR 50 Appendix J.

Recently, however, it was recognized that due to the NRC Staff legal interpretation described in NRC Inspection and Enforcement Manual, Part 9900: "CFR Discussions, Containment Integrated Leak Rate Testing", and due to the specific wording of Paragraph III.A.3(a) of Appendix J that only cited the ANSI N45.4-1972 Standard at that time, a more formal exemption would have been appropriate to better document the approval to use ANSI Standard ANSI/ANS N56.8-1981.

Also, later, after the 1985 NRC letter discussed above was issued, Appendix J was revised and a reference to the 1987 version of ANSI/ANS N56.8 was added. Therefore, an exemption is no longer necessary in order to utilize the Mass Point Method. Also, since specific references to ANSI N45.4 and to ANSI/ANS N56.8 are both now provided within 10 CFR 50 Appendix J, there is no need to continue to reference these Standards within the PNPP Technical Specifications. Surveillance Requirement 4.6.1.2, in which these two standards are currently referenced, will still continue to contain the requirement that Type A leak rate testing be performed "in conformance with the criteria specified in Appendix J of 10 CFR 50," which is all that is necessary to be contained within the Technical Specifications. The proposed revised wording of Surveillance Requirement 4.6.1.2 is presented below:

"The primary containment leakage rates shall be demonstrated at the following test schedule and shall be determined in conformance with the criteria specified in Appendix J of 10 CFR Part 50, except that the provisions of Bechtel Topical Report BN-TOP-1 may be used for Type A tests having a duration less than 24 hours."

The reference to the Bechtel Corporation Topical Report BN-TOP-1 currently contained within the Technical Specifications does need to be retained, because it is not specifically referenced within 10 CFR 50 Appendix J, though

Section 7.6 of ANSI N45.4-1972 provides acceptance of the BN-TOP-1 concept. The BN-TOP-1 report details an NRC accepted methodology for performance of Type A tests with durations less than 24 hours. Therefore, the proposed change to Surveillance Requirement 4.6.1.2 continues to note that BN-TOP-1 may be utilized for Type A testing at PNPP (consistent with our current licensing basis). It also clarifies that such use is for Type A tests that have a duration less than 24 hours since for longer tests, other methods such as the Mass Point Method may be utilized, as described in Appendix J.

The PNPP still intends to report Type A test results based on the Mass Point Method described in ANSI/ANS N56.8, however this should not be a Technical Specification requirement. Also, the present Technical Specification wording, which specifically references the 1981 version of the Standard, is overly restrictive in that it forces the PNPP to report results based on the 1981 version of the Standard and prevents us from upgrading to more current versions of the Standard (or other newer standards) even though they may later be recognized explicitly by the NRC within Appendix J. To meet the intent of the current reporting requirement, the PNPP will continue to report the test results based on the Mass Point Method described in the current Appendix J referenced version of ANSI/ANS N56.8 (the 1987 version). If the NRC endorses a new version of this Standard (or another standard), this reporting requirement could be revised without the need to submit a License Amendment Request. This statement therefore does not need to be contained within the PNPP Technical Specifications.

Since the use of BN-TOP-1 is not specifically cited in the regulation, the Bases are also proposed to be revised (as described in Attachment 2) to explain that the utilization of this topical report is in accordance with Section 7.6 of ANSI N45.4-1972 and has been approved for use by the NRC.

Part C - Decouple the Performance of the Third Type A Test from the Shutdown for the 10-Year Plant Inservice Inspection

Paragraph III.D.1(a) of 10 CFR 50 Appendix J requires in part, "... a set of three Type A tests shall be performed, at approximately equal intervals during each 10-year service period. The third test of each set shall be conducted when the plant is shutdown for the 10-year plant inservice inspections." Type A tests are defined in Paragraph II.F of Appendix J as those "... tests intended to measure the primary reactor containment overall integrated leakage rate ... at periodic intervals ..." The 10-year plant inservice inspection (ISI) is that series of inspections performed every 10-years in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. The PNPP proposes to perform the three Type A tests within each 10-year service period at intervals as specified by Technical Specifications, with the third test of each set conducted as close as practical to the end of the 10-year service period. However, there would be no connection as currently required by the regulation between the third Appendix J Type A test and the plant 10-year inservice inspection outage.

The change proposed to be made to Technical Specification Surveillance Requirement 4.6.1.2.a involves removing the second sentence which requires that the third Type A test of each set be conducted during the shutdown for the 10-year plant inservice inspection. In conjunction with this proposed change, a request for an exemption to Paragraph III.D.1(a) of Appendix J is

being submitted separately by letter PY-CEI/NRR-1651L. (Note that this proposed exemption does not alter the existing requirement that three ILRTs be performed during each 10-year service period.)

The following discussion addresses the Appendix J requirement (as reflected in Surveillance Requirement 4.6.1.2.a.) that links the third Type A test of each set to the shutdown period for the 10-year plant inservice inspection. The Type A containment integrated leak rate tests and the 10-year inservice inspection program are independent of each other and provide assurance of different plant characteristics. The Type A test assures the required leak-tightness of the containment to demonstrate compliance with the guidelines of 10 CFR Part 100. The 10-year inservice inspection program provides assurance of the structural integrity of the structures, systems, and components as directed by Section XI of the ASME Boiler and Pressure Vessel Code and Addenda in compliance with 10 CFR 50.55a. At PNPP, the inservice inspection volumetric, surface and visual examinations of components and system pressure tests are performed in accordance with 10 CFR 50.55a(g)(4) throughout the 10-year inspection interval. The major portion of this effort is presently being performed periodically during refueling outages.

The regulation, by linking these two requirements, forces the third Type A test (in the 10-year service period) and the 10-year ISI to be performed during the same outage. If three Type A tests have already been performed in the 10-year service period this regulation would require that another Type A test be performed during the 10-year ISI outage, since by the regulation the test and examination have to be performed together. An Appendix J exemption and a Technical Specification change would be necessary to prevent having to perform an otherwise unnecessary Type A test. There is no benefit to be gained by coupling the third Type A test and the 10-year plant inservice inspections to the same refueling outage since elements of the PNPP ISI program are conducted throughout each 10-year cycle rather than just during a refueling outage at the end of the 10-year cycle. Consequently, the subject coupling requirement offers no benefit either with regard to safety or to economical operation of the facility. There are no known requirements other than this one (for which relief is requested) that links performance of the ILRT and the inservice inspection. Note that the proposed revision to 10 CFR 50 Appendix J, published in the Federal Register on October 29, 1986 proposes the same exact change, to decouple the performance of the third Type A test (in each 10-year service period) from being required to occur during the same outage as the 10-year plant inservice inspections. Additionally, several plants have previously received similar exemptions and corresponding amendments to their TS to implement this proposed change.

The TS and Bases changes necessary to remove the tie between the performance of the third Type A test (in each 10-year service period) and the 10-year plant inservice inspection are marked-up in Attachment 2. Also, the Bases are proposed to be revised to explain that an exemption to 10 CFR 50 Appendix J has been granted to eliminate the tie between the ILRT and the ISI program.

DESCRIPTION OF THE PROPOSED TECHNICAL SPECIFICATION AND BASES CHANGES

Refer to Attachment 2 for a marked-up copy of the subject Technical Specification and Bases pages.

LCO 3.6.1.2.a and Action 3.6.1.2.a (page 3/4 6-3)

Add "except for the main steam line isolation valves" and a superscript "#" after the words "overall integrated leakage rate" to clarify that the main steam line isolation valve leakage contribution is exempted from inclusion in the overall integrated primary containment leak rate (it has been accounted for separately) and that this is an exemption to 10 CFR 50 Appendix J.

LCO 3.6.1.2.b and Action 3.6.1.2.b (page 3/4 6-3)

Add a superscript "#" after the words "except for main steam line isolation valves" to clarify that this leakage contribution is exempted from inclusion in the combined local leak rate (it has been accounted for separately) and that this is an exemption to 10 CFR 50 Appendix J.

New Footnote # (at the bottom of page 3/4 6-3)

Add a new footnote "#" at the bottom of the page indicating that the above changes represent exemptions to Appendix J of 10 CFR 50.

Surveillance Requirement 4.6.1.2 (page 3/4 6-4)

Delete the second-half of the sentence after the words "10 CFR Part 50," since the two ANSI Standards are specifically included within Appendix J, therefore no direct reference to them is needed within the Technical Specifications. A clarification is also inserted to explain the allowance for the use of the BN-TOP-1 Topical Report for Type A tests with durations less than 24 hours.

Surveillance Requirement 4.6.1.2.a (page 3/4 6-4)

Delete the last sentence of Surveillance Requirement 4.6.1.2.a. This removes the requirement to perform the third Type A test in the set for each 10-year service period during the shutdown for the 10-year plant inservice inspection.

Bases: Containment Leakage - Specification 3/4.6.1.2 (page B 3/4 6-2)

Revise the Bases to denote that the use of Bechtel Topical Report BN-TOP-1 is in accordance with Section 7.6 of ANSI N45.4-1972 and has been approved by the NRC, and to list and describe the exemptions to Appendix J described in this letter (see Items d and e listed in Insert B, page 6 of Attachment 2).

Note that the current Bases only describe an exemption to Appendix J for air lock testing as was granted in the PNPP Safety Evaluation Report, Supplement 7. The markup of the Bases in Attachment 2 provides a rewritten version of the existing Bases to clarify the wording of the air lock exemption and to set

the framework for a listing in the Bases of other Appendix J exemptions, such as the ones requested herein. It is proposed that the wording in Attachment 2 be added to the Bases of Specification 3.6.1.2 following approval of each of the exemption requests.

SIGNIFICANT HAZARDS CONSIDERATION

The discussion of whether the proposed change involves a significant hazards consideration is included in Attachment 3 of this letter.

ENVIRONMENTAL CONSIDERATION

The proposed Technical Specification change request was evaluated against the criteria of 10 CFR 51.22 for environmental considerations. As shown above and in Attachment 3, the proposed change does not involve a significant hazards consideration, nor does it increase the types and amounts of effluents that may be released offsite, nor does it significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, it has been concluded that the proposed Technical Specification change meets the criteria given in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.