

Attachment IIA
Marked-up Technical Specification Page

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- a. Three Type A tests (Overall Integrated Containment Leakage Rate) shall be conducted at 40 ± 10 month intervals during shutdown at either P_a , 14.68 psig, or (Unit 1) at P_t , 7.34 psig, during each 10-year service period. ^{*}The third test of each set shall be conducted during the shutdown for the 10-year plant inservice inspection;
- b. If any periodic Type A test fails to meet either $0.75 L_a$ or (Unit 1) $0.75 L_t$, the test schedule for subsequent Type A tests shall be reviewed and approved by the Commission. If two consecutive Type A tests fail to meet either $0.75 L_a$ or (Unit 1) $0.75 L_t$, a Type A test shall be performed at least every 18 months until two consecutive Type A tests meet either $0.75 L_a$ or (Unit 1) $0.75 L_t$ at which time the above test schedule may be resumed;
- c. The accuracy of each Type A test shall be verified by a supplemental test which:
 - 1) Confirms the accuracy of the test by verifying that the supplemental test result, L_c , minus the sum of the Type A and the superimposed leak, L_o , is equal to or less than $0.25 L_a$ or (Unit 1) $0.25 L_t$;
 - 2) Has a duration sufficient to establish accurately the change in leakage rate between the Type A test and the supplemental test; and
 - 3) Requires that the rate at which gas is injected into the containment or bled from the containment during the supplemental test is between $0.75 L_a$ and $1.25 L_a$ or (Unit 1) $0.75 L_t$ and $1.25 L_t$.
- d. Type B and C tests shall be conducted with gas at a pressure not less than P_a , 14.68 psig, at intervals no greater than 24 months ^{*} except for tests involving:
 - 1) Air locks,
 - 2) Purge supply and exhaust isolation valves with resilient material seals, and
 - 3) Dual-ply bellows assemblies on containment penetrations between the containment building and the annulus.

~~*This surveillance need not be performed for those penetrations identified in Table 3.6-1a until prior to entering HOT SHUTDOWN following the Unit 1 first refueling. (This applies to Unit 1 only). (REPLACE W/ ATTACHED)~~

* For Catawba Unit 1, a one-time change is granted to extend this interval between the second test (performed 3/91) and the third test to 60 ± 10 months. Also, this test will not be performed during the 10-year ISI refueling outage. This represents an exemption to 10 CFR 50, Appendix J.

Attachment III
No Significant Hazards Analysis

The following analysis is presented, pursuant to 10 CFR 50.91, to demonstrate that the proposed change will not create a Significant Hazard Consideration.

1. The proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Containment leak rate testing is not an initiator of any accident; the proposed interval extension does not affect reactor operations or accident analysis, and has no radiological consequences. Therefore, this proposed change will not involve an increase in the probability or consequences of any previously-evaluated accident.

2. The proposed change will not create the possibility of any new accident not previously evaluated.

The proposed change does not affect normal plant operations or configuration, nor does it affect leak rate test methods. The test history at Catawba (no ILRT failures) provides continued assurance of the leak tightness of the containment structure.

3. There is no significant reduction in a margin of safety.

It has been documented in draft NUREG-1493 that an increase in the ILRT interval from 1 test every 3 years to 1 test every 10 years would result in a population exposure risk in the vicinity of 5 representative plants from .02% to .14%. The proposed change included herein, an increase from 40 ± 10 months to 60 ± 10 months, represents a small fraction of that already very small increase in risk. Therefore, it may be concluded that no significant reduction in a margin of safety will occur.

Based on the above, no significant hazards consideration is created by the proposed change.