

## CONTAINMENT SYSTEMS

### PRIMARY CONTAINMENT

### CONTAINMENT LEAKAGE

Specified in  
10 CFR 50, Appendix J

### SURVEILLANCE REQUIREMENTS

4.6.1.2 The 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:

- a. ~~Three~~ Type A tests (Overall Integrated Containment Leakage Rate) shall be conducted at ~~40 ± 10 month~~ intervals during shutdown at a pressure not less than  $P_a$ , 49.6 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  $0.75 L_a$ , 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  $0.75 L_a$ , a Type A test shall be performed at least every 18 months until two consecutive Type A tests meet  $0.75 L_a$  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,  $L_c$ , is in accordance with the following equation:

$$|L_c - (L_{am} + L_o)| \leq 0.25 L_a$$

where  $L_{am}$  is the measured Type A test leakage and  $L_o$  is the superimposed leak;

- 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  $1.25 L_a$ .

### **III. Retype of Proposed Changes**

See attached retype of proposed changes to Technical Specifications. The attached retype reflects the currently issued version of Technical Specifications. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

Revision bars are provided in the right hand margin to designate a change in the text.

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#### SURVEILLANCE REQUIREMENTS

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4.6.1.2 The 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:

- a. Type A tests (Overall Integrated Containment Leakage Rate) shall be conducted at intervals specified in 10 CFR 50, Appendix J during shutdown at a pressure not less than  $P_a$ , 49.6 psig.
- b. If any periodic Type A test fails to meet  $0.75 L_a$ , 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  $0.75 L_a$ , a Type A test shall be performed at least every 18 months until two consecutive Type A tests meet  $0.75 L_a$  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,  $L_c$ , is in accordance with the following equation:

$$|L_c - (L_{am} + L_o)| \leq 0.25 L_a$$

where  $L_{am}$  is the measured Type A test leakage and  $L_o$  is the superimposed leak;

- 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  $1.25 L_a$ .

#### IV. Determination of Significant Hazards for License Amendment Request 94-08 Proposed Changes

North Atlantic has reviewed the proposed change in accordance with 10CFR50.92 and concluded that the change does not involve a significant hazard.. The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed change does not involve a significant hazard because:

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

Type A tests are performed to ensure that the total leakage from containment does not exceed the maximum allowable primary containment leakage rate at a calculated peak containment internal pressure contained in the Technical Specifications and UFSAR. The proposed change to Surveillance Requirement 4.6.1.2.a of the Technical Specifications does not change the methodology, frequency or acceptance criteria for Type A tests. The change does not modify the maximum allowable leakage rate at the calculated peak containment pressure, does not impact the design basis of the containment, and does not change the post-accident containment response. This assures compliance with the dose limits of 10 CFR 100.

- (2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change to Surveillance Requirement 4.6.1.2.a of the Technical Specifications does not change the methodology, frequency or acceptance criteria for Type A tests. The change does not make any physical or operational changes to existing plant structures, systems, or components. Maintaining the leakage through the containment boundary to the atmosphere within a specific value ensures that the plant complies with the requirements of 10 CFR 100. Therefore, the proposed change to Surveillance Requirement 4.6.1.2.a does not create the possibility of a new or different kind of accident from any previously analyzed.

- (3) The proposed change does not result in a significant reduction in the margin of safety.

The proposed change to Surveillance Requirement 4.6.1.2.a of the Technical Specifications does not change the methodology, frequency or acceptance criteria for Type A tests. The change does not modify the maximum allowable leakage rate at the calculated peak containment pressure, does not impact the design basis of the containment, and does not change the post-accident containment response.

Based on the above, the proposed change does not involve a reduction in the margin of safety.

**V. Proposed Schedule for License Amendment Issuance and Effectiveness**

North Atlantic requests NRC review of License Amendment Request 94-08 and issuance of a license amendment having immediate effectiveness by July 25, 1995.

**VI. Environmental Impact Assessment**

North Atlantic has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, North Atlantic concludes that the proposed change meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.