



GULF STATES UTILITIES COMPANY

RIVER BEND STATION

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AREA CODE 504

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May 15, 1985
RBG- 21,024
File G9.5

Mr. Harold Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

River Bend Station - Unit 1
Docket No. 50-458

Gulf States Utilities Company requests, pursuant to 10CFR50.12(a), an exemption from the air lock testing requirements of 10CFR50 Appendix J, paragraph III.D.2.(b)(ii). A discussion with appropriate justification is provided in the attachment to this letter. The exemption is authorized by law, does not endanger life or property or the common defense and security, and is in the public interest. This exemption previously has been granted by the Commission for other boiling water reactors.

Sincerely,

W. J. Cahill
Senior Vice President
River Bend Nuclear Group

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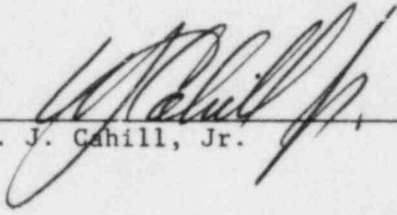
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA	§	
PARISH OF WEST FELICIANA	§	
In the Matter of	§	Docket Nos. 50-458
GULF STATES UTILITIES COMPANY	§	50-459

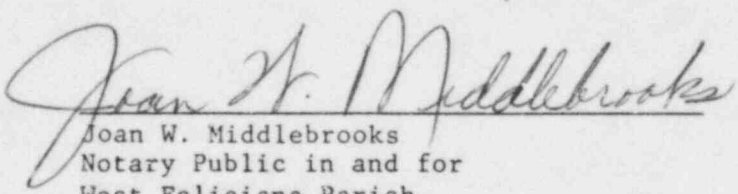
(River Bend Station,
Unit 1)

AFFIDAVIT

W. J. Cahill, Jr., being duly sworn, states that he is a Vice President of Gulf States Utilities Company; that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.


W. J. Cahill, Jr.

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 15th day of May, 19 85.


Joan W. Middlebrooks
Notary Public in and for
West Feliciana Parish,
Louisiana

My Commission is for Life.

Background

10CFR50 Appendix J Paragraph III.D.2.(b) requires periodic testing of containment air locks during operation and after periods of shutdown. Paragraph III.D.2.(b)(i) requires the licensee to perform an overall air lock test at Pa every 6 months. Paragraph III.D.2.(b)(ii) requires an air lock test at Pa after periods of shutdown (i.e., when containment integrity is not required). Paragraph III.D.2.(b)(iii) requires an overall air lock test at Pa or, if the air lock has testable seals, testing the seals at Pa. The testing under Paragraph III.D.2.(b)(iii) applies when containment integrity is in effect and must be accomplished within 3 days of closing the air lock doors. The following exemption request only applies to Paragraph III.D.2.(b)(ii) and is in the form of an alternate acceptable method. Changes to Paragraphs III.D.2.(b)(i) and (iii) are not requested.

Exemption Request

10CFR Part 50, Appendix J, Paragraph III.D.2.(b) describes three air lock testing requirements. Technical Specification 4.6.1.4 items (a) and (b) correspond to and implement these requirements with one exception. Paragraph III.D.2.(b)(ii) applies to containment air lock testing at the end of periods when the containment integrity is not required. Specifically, at the end of such periods, the air lock is to be tested at Pa. In lieu of this, it is requested that, if during this period there has been no maintenance conducted on the air locks that could affect its sealing capability, the air lock seals be required to be tested at Pa within 3 days of closing. If maintenance has been performed that could affect the air lock sealing capability, then the overall air lock test at Pa would be conducted.

Justification

In support of the above requested exemption, it is noted that Appendix J Paragraph III.D.2.(b)(iii) allows testing of air lock seals at Pa within 3 days of closing in lieu of an overall air lock test at Pa. It is also recognized that this testing of seals is accomplished when containment integrity is required. This is therefore, a recognition that testing of the air lock seals is acceptable in lieu of the overall air lock Pa test.

Testing of the air lock seals (along with the other required air lock testing of Paragraph III.D.2.(b)(i) and (b)(iii)) provides reasonable assurance against undue air lock leakage. By applying the exemption, no increase in air lock leakage is expected. Therefore, there will be no increase in post accident offsite or onsite doses as a result of granting the exemption. From this it is concluded that there is no additional environmental impact associated with granting the exemption.

Conclusion

In review of the above information, it can be concluded that the granting of the requested exemption; 1) is authorized by law, 2) does not endanger life or property or the common defense or security, and 3) is in the public interest.