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October 29, 1996

MEMORANDUM TO: NRR Project Directors

THRU: Robert A. Capra, Director  
Project Directorate III-2  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation *[Signature]*

FROM: Clyde Y. Shiraki, Lead Project Manager  
Project Directorate III-2  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation *[Signature]*

SUBJECT: ADDITIONAL PROJECT MANAGER GUIDANCE FOR 10 CFR PART 50,  
APPENDIX J, OPTION B; TECHNICAL SPECIFICATION AMENDMENTS

The purpose of this memorandum is to provide additional guidance for processing Technical Specification (TS) amendments that request implementation of the revision to 10 CFR Part 50, Appendix J, that allows test intervals for containment leakage rate testing to be increased to certain nominal maximums based on past test performance. In a memorandum dated March 13, 1996, project manager guidance was provided for processing TS amendments to implement 10 CFR Part 50, Appendix J, Option B. As amendments have been submitted and reviewed, ancillary issues have arisen that are best addressed on a generic basis.

First, the final rule was written to allow the staff to review any Containment Leakage Rate Testing Program that a licensee developed and proposed. Therefore, a licensee may choose to deviate from either Regulatory Guide 1.163, "Performance-Based Containment Leakage-Test Program," or NEI 94-01, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J." These deviations should be listed as exceptions in the description of the Containment Leakage Rate Testing Program that is incorporated into the Administrative Section of the TS. The deviations should not be considered exemptions to the rule. They should be specifically requested by the licensee, adequate justification should be provided and the safety evaluation should specifically address their acceptability to the staff. In the description of the amendment section of the proposed no significant hazards consideration determination that is published in the Federal Register (FR notice), make note of the existence of these exceptions in the following manner. The words in **BOLD** type have been added to the example given in the March 13, 1996, project manager guidance.

*[Handwritten: DFO3 1/0]*

Description of amendment request: The proposed amendments would change the Technical Specifications to implement 10 CFR Part 50, Appendix J, Option B, by referring to Regulatory Guide 1.163, "Performance-Based

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Containment Leakage-Test Program," with certain exceptions as detailed in the licensee's application.

The second issue that has developed deals with resilient seals in butterfly isolation valves. As a result of reports of unsatisfactory performance of these seals due to seal deterioration, the NRC established Generic Issue B-20, "Containment Leakage Due to Seal Deterioration," to study this issue and propose a regulatory resolution to the problem. IE Circular 77-11, "Leakage of Containment Isolation Valves With Resilient Seals," was issued and the final resolution imposed augmented leakage rate testing requirements which require more frequent testing than required by 10 CFR Part 50, Appendix J, for containment purge and vent line isolation valves that used resilient seal materials. Most plant Technical Specifications contain these augmented leakage rate testing requirements.

Some licensees have requested TS changes to the leakage rate testing frequency of containment purge valves with resilient seals as part of their adoption of 10 CFR Part 50, Appendix J, Option B. However, since these testing requirements are not part of Appendix J, they can not be modified by a change to Appendix J. Since the issue is similar to that of the Option B amendment, i.e., an increase in the test frequency interval, the staff has approved changes to the leakage rate test frequency for these valves in conjunction with the adoption of Option B. However, sufficient specific justification must be provided to demonstrate good leakage rate performance over an extended period of time. If good performance can be demonstrated, the NRC has approved testing at the frequency permitted by Regulatory Guide 1.163, which is 30 months. The present test interval is typically 6 months. Note: The FR notice must specifically list this portion of the amendment request because it is not part of the normal conversion to Option B.

If you have any questions concerning these two issues, call Clyde Shiraki at 415-3101.

cc: R. Zimmerman  
S. Varga  
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DRPE/DRPW Deputy Directors  
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