UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

Report Nos.: 50-325/85-31 and 50-324/85-31

Licensee: Carolina Power and Light Company
P. O. Box 1551
Raleigh, NC 27602

Docket Nos.: 50-325 and 50-324 License Nos.: DPR-71 and DPR-62

Facility Name: Brunswick 1 and 2

Inspection Conducted: September 9-13 and 23-26, 1985

Inspectors: John B Macdonald 10/11/85
J. B. Macdonald Date Signed

L. S. Mellen 10/11/85
L. S. Mellen Date Signed

for Frank Jape 10/11/85
H. L. Whitener Date Signed

Accompanying Personnel: M. Allen

Approved by: Frank Jape 10/11/85
Frank Jape, Section Chief Date Signed
Engineering Branch
Division of Reactor Safety

SUMMARY

Scope: This routine, unannounced inspection involved 175 inspector-hours on site in the areas witnessing of 10 CFR 50 Appendix J Type A, B, and C leak rate testing; followup on licensee action on previous inspection findings, and previously identified inspector follow-up items.

Results: No violations or deviations were identified.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*P. W. Howe, Vice President, BNP
*C. R. Dietz, General Manager, BNP
*#B. E. Hinkley, Manager, Technical Support
*#M. S. Blinson, Inservice Inspection Specialist
#J. J. Blessing, U. E. S. C., ILRT Engineer
#R. E. Shirk, U. E. S. C. ILRT Engineer
M. J. Pastva, Jr., Regulatory Technician
*#R. M. Poulk, Jr., Senior Specialist, Regulatory Compliance

Other licensee employees contacted included construction craftsmen, engineers, technicians, operators, mechanics, security force members, and office personnel.

NRC Resident Inspector

#T. Ruland
*L. Garner

*Attended exit interview on September 13, 1985
#Attended exit interview on September 26, 1985

2. Exit Interview

The inspection scope and findings were summarized on September 13, 1985, and September 26, 1985, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings. No dissenting comments were received from the licensee. The following new inspector followup item was identified during this inspection.

Inspector Followup Item (IFI) 325, 324/85-31-01, Isolation Valves Local Leak Rate Tested in the Reverse Direction, paragraph 5.c.7.

The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspectors during this inspection.

3. Licensee Action on Previous Enforcement Matters

a. (Closed) Violation Item 325/81-13-01, Inadequate (CILRT) Procedure. In a CP&L letter to NRC Region II, Serial Number NO-81-1362, dated August 24, 1981, the licensee committed to revise the Brunswick (ILRT) procedure to provide for venting and draining of systems prior to performance of the ILRT to correct the problems cited in this violation. The inspectors reviewed the revised procedure Periodic Test

PT-20.5 Integrated Primary Containment Leak Rate Test (IPCLRT). Of particular concern was meeting the test requirements of 10 CFR Part 50 Appendix J for proper venting and draining of systems and meeting the acceptance criteria of Appendix J, BN-TOP-1, and ANS-45.4. Periodic Test PT-20.5 meets these requirements and acceptance criteria. Violation Item 325/81-13-01 is closed.

b. (Closed) Unresolved Item 325/81-13-02, Review of the June 1981 Unit 1 Type A Test Results. The Type A test is considered a failed test because it did not meet the acceptance criteria in Appendix J Paragraph III.A.1(a), which states that during the performance of the test no repairs or adjustments shall be made so that the containment can be tested in as close to the "as is" condition as possible. The licensee identified and isolated a leakage path through the CAC system after the test was started. Since this constituted an adjustment to the containment, subsequent to the inspection, the licensee determined this was a failed test. Unresolved Item 325/81-13-01 is closed.

c. (Closed) Unresolved Item 325, 324/85-21-01, Complete Review of LLRT Valve Alignments to Determine if Procedure is Adequate. The inspectors reviewed Engineering Procedure: ENP-16.4 Use of Local Leak Rate Test Equipment and 121 periodic tests: (PT-20.3.54-PT-20.3.175) Local Leak Rate Test for Containment Isolation. The valve alignments in all the procedures reviewed were in the proper test position and a vent path for each penetration was established. The valves tested in the reverse (Non-LOCA) direction were identified in CP&L letter, serial number: BSEP/84-1617. This letter is addressed in paragraph 5.c.7. Unresolved Item 325, 324/82-21-01 is closed.

d. (Closed) Unresolved Item 325, 324/82-38-01, Verify Testing of Isolation Valves in the Reverse Direction is Conservative. The licensee has committed to preparing a report to NRR including an evaluation and justification for testing isolation valves in the reverse (Non-LOCA) direction. This item is addressed in paragraph 7.c. Unresolved Item 325, 324/82-38-01 is closed.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Surveillance Containment Leak Rate Testing (CILRT) Units 1 and 2 (61720)

The inspectors examined Type C local leak rate testing procedures and the local leak rate test apparatus. During review of the procedures, the inspectors determined which valves were tested in the reverse direction, and verified that the identification of these valves was documented. Acceptance criteria utilized by the inspectors appear in 10 CFR 50 Appendix J.

a. Local Leak Rate Test Apparatus

The inspectors reviewed the construction of the licensee's local leak rate test apparatus with the following observations:

(1) The flow meters on the test rig were within the range for normally expected valve leakage.

(2) A potential leakage path (via valve V-8) exists such that high pressure make-up could bypass the flow meters during the performance of local leak rate testing. This would result in a nonconservative leak rate calculation. The licensee will review the construction of the test apparatus and make adjustments if appropriate.

(3) The test apparatus employs the upstream test method which will detect seat, stem and packing leakage (except as noted in section on valves tested in the non-LOCA direction).

b. Local Leak Rate Test Procedures

The inspectors reviewed the following local leak rate performance test procedures:

PT NO.	Equipment Tested	Penetration
20.3.54	B21-F010A	X-9A
20.3.55	B21-F010B	X-9B
20.3.56	B21-F032A,E41-F006	X-9A
20.3.57	B21-F032B,E51-F013, G31-F039	X-9B
20.3.58	B21-F016,F019	X-8
20.3.59	B32-V22,V30	X-62A,78A
20.3.60	B32-F019,F020	X-56E
20.3.61	B32-V24	X-62A
20.3.62	B32-V32	X-78A
20.3.63	C41-F006	X-42
20.3.64	C41-F007	X-42
20.3.65	CAC-V47	X-205
20.3.66	CAC-V48	X-25
20.3.67	CAC-V4,V5,V6,V15, V55,V56	X-25,X-205
20.3.68	CAC-V7,V8,V22	X-220
20.3.69	CAC-V9,V10,V23	X-26
20.3.70	CAC-X20A,V16	X-205
20.3.71	CAC-X20B,V17	X-205
20.3.72	CAC-V29,V50	X-3B
20.3.73	CAC-PV1200B	X-49B
20.3.74	CAC-PV1261	X-49B
20.3.75	CAC-PV1227A	X-73A

PT NO.	Equipment Tested	Penetration
20.3.76	CAC-PV1227B	X-73B
20.3.77	CAC-PV1227C (U-1)	X-73C
	CAC-PV1227E (U-2)	X-73E
20.3.78	CAC-PV1227E (U-1)	X-73E
	CAC-PV1227C (U-2)	X-73C
20.3.79	CAC-PV1260	X-73E (U-1)
		X-73C (U-2)
20.3.80	CAC-PV1231B	X-244B
20.3.81	CAC-PV3440	X-76B
20.3.82	CAC-PV1225B	X-76B
20.3.83	CAC-PV1211F	X-54F
20.3.84	CAC-PV1262	X-54F
20.3.85	CAC-PV1209A	X-57A
20.3.86	CAC-PV1209B	X-57B
20.3.87	CAC-PV1205E	X-60E
20.3.88	CAC-PV1215E	X-245E
20.3.89	CAC-PV1211E	X-54E
20.3.90	CAC-PV3439	X-54E
20.3.91	CAC-PV4541	X-244B
20.3.92	CAC-SV4540	X-245E
20.3.93	CAC-SV4409-4	X-57A
20.3.94	CAC-SV4409-3	X-57B
20.3.95	CAC-SV4409-2	X-60E
20.3.96	CAC-SV4409-1	X-209B(A)
20.3.97	CAC-SV4410-4	X-73A
20.3.98	CAC-SV4410-3	X-73B
20.3.99	CAC-SV4410-2	X-73C (U-1)
		X-73E (U-2)
20.3.100	CAC-SV4410-1	X-206A(A)
20.3.101	CAC-PV1218C	X-206A(C)
20.3.102	CAC-PV1219B	X-206B(B)
20.3.103	CAC-PV1225C	X-76C
20.3.104	CAC-PV1209D	X-57D
20.3.105	CAC-PV1219C	X-206B(C)
20.3.106	CAC-PV1213A	X-209B(A)
20.3.107	CAC-SV1218A	X-206A(A)
20.3.108	E11-F008,F009	X-12
20.3.109	E11-F011A	X-210A
20.3.110	E11-F011B	X-210B
20.3.111	E11-F015A,F017A	X-13A
20.3.112	E11-F015B,F017B	X-13B
20.3.113	E11-F016A,F021A	X-39A
20.3.114	E11-F016B,F021B	X-39B
20.3.115	E11-F020A	X-225A
20.3.116	E11-F020B	X-225B
20.3.117	E11-F022,F023	X-17
20.3.118	E11-F024A,F027A,F028A	X-210A,X-211A
20.3.119	E11-F024B,F027B,F028B	X-210B,X-211B
20.3.120	E11-F025A	X-210A
20.3.121	E11-F025B	X-210B

PT NO.	Equipment Tested	Penetration
20.3.122	E11-F037D	X-68A (U-1)
		X-68C (U-2)
20.3.123	E11-F037B	X-68D
20.3.124	E11-F043D	X-68C (U-1)
		X-68A (U-2)
20.3.125	E11-F043B	X-68B
20.3.126	E11-F037C	X-51C
20.3.127	E11-F043C	X-51A
20.3.128	E11-F043A	X-51B
20.3.129	E11-F037A	X-51D
20.3.130	E11-F097	X-210D
20.3.131	E11-F007A	X-210A
20.3.132	E11-F007B	X-210B
20.3.133	E11-F103A	X-214
20.3.134	E11-F103B	X-214
20.3.135	E11-F055A	X-214
20.3.136	E11-F055B	X-214
20.3.137	E11-V20	X-214
20.3.138	E11-V21	X-214
20.3.139	E11-F029	X-210B
20.3.140	E21-F001A	X-227A
20.3.141	E21-F001B	X-227B
20.3.142	E21-F005A,F004A	X-16A
20.3.143	E21-F005B,F004B	X-16B
20.3.144	E21-F015A	X-223A
20.3.145	E21-F015B	X-223B
20.3.146	E21-F031A	X-223A
20.3.147	E21-F031B	X-223B
20.3.148	E41-F002,F003	X-11
20.3.149	E41-F012	X-210B
20.3.150	E41-F042	X-226
20.3.151	E41-F022,F040	X-222
20.3.152	E41-F021,F049	X-214
20.3.153	E41-F075,F079	X-214,X-218
20.3.154	E41-PV1218C,PV1220D	X-206A(D)
		X-206C(D)
20.3.155	E41-PV1219D,PV1221D	X-206B(D)
		X-206D(D)
20.3.156	E51-F007,F008	X-10
20.3.157	E51-F019	X-210
20.3.158	E51-F031	X-224
20.3.159	E51-F002,F028	X-221
20.3.160	E51-F001,F040	X-212
20.3.161	E51-F062,F066	X-212,X-216
20.3.162	G16-F003,F004	X-18
20.3.163	G16-F019,F020	X-19
20.3.164	G31-F001,F004	X-14
20.3.165	G31-F042	X-9B
20.3.166	RCC-V28,V52	X-23,X-24
20.3.167	RXS-PV1222B,PV1222C	X-77B,X-77C

PT NO.	Equipment Tested	Penetration
20.3.168	RNA-V101	X-55
20.3.169	RNA-V103	X-71
20.3.170	LA-PV1204B	X-62B
20.3.171	LA-PV1204C	X-62C
20.3.172	RXS-SV4186	X-209A(B) (U-1) X-209B(D) (U-2)
20.3.173	RXS-SV4187	X-209A(B) (U-1) X-209B(D) (U-2)
20.3.174	RXS-SV4188	X-209A(D) (U-1) X-209B(B) (U-2)
20.3.175	RXS-SV4189	X-209A(D) (U-1) X-209B(D) (U-2)

These are all of the Type C rate test procedures, as identified by the licensee. The procedures meet the applicable requirements of 10 CFR 50, Appendix J, Section III.C.

c. Valves Tested in Non-LOCA Direction

10 CFR 50, Appendix J requires containment isolation valves to be tested in the direction that the valve would be required to perform its safety function unless it can be determined that the results from the tests for a pressure applied in a different direction will provide equivalent or more conservative results. The inspectors reviewed the Type C test procedures to determine which valves were tested in the reverse direction. The number and type valves tested in the reverse direction is summarized in the table below. Final determination of conservation of the reverse direction testing of these valves will be made by the NRC Office of Nuclear Reactor Regulation.

TABLE

VALVES TESTED IN OPPOSITE DIRECTION OF LOCA

VALVE TYPE	NUMBER TESTED IN REVERSE DIRECTION	
	Unit 1	Unit 2
Atlas RIP valves	0	17
Gate Valves	23	23
Globe Valves	18	19
Plug Valves	0	11
Solenoid Valves	2	2
Butterfly Valves	0	7

The specific valves tested in the reverse direction are listed in the following paragraphs.

(1) Atlas RIP Valves. These valves have bellows and diaphram arrangement which eliminates any possible leakage path around the stem. As a result, pressure applied om LLRT direction reflects

all possible leakage paths from containment. These valves on Unit 2 are as follows:

CAC-PV-1218C	E11-F037A
CAC-PV-1219B	E11-F037B
CAC-PV-1225C	E11-F037C
CAC-PV-1209D	E11-F037D
CAC-PV-1219C	E11-F043A
E41-PV-1218D	E11-F043B
E41-PV-1220D	E11-F043C
E41-PV-1219D	E11-F043D
E41-PV-1221D	

The valves on Unit 1 have been replaced by excess flow check valves. Similar modifications are planned for Unit 2 during the next refueling outage.

(2) Gate Valves. These valves incorporate a wedge-shaped disc which seats on both seating surfaces simultaneously. This seating creates a disk-to-seat seal, and the packing is not exposed to LOCA pressure. Therefore, a failure of the seating surface nearest primary containment and a packing failure would be required before leakage to the atmosphere would occur.

Six gate valves are located inside the drywell. As a result, any leakage from the packing would still be inside primary containment. These valves are as follows:

E21-F016	E41-F002
E11-F009	E51-F002
E11-F022	G31-F001

Seven gate valves are in lines which penetrate primary containment and extent below the minimum water level, which would exist in the torus during a LOCA. As a result, the only leakage possible from primary containment would be water leakage. These valves are as follows:

E11-F011A	E41-F042
E11-F011B	E41-F075
E11-F007A	E51-F031
E11-F007B	

Gate valve numbers B32-V22 and B32-V30 are in 3/4-inch lines. The size of the stem on these valves is 3/8 inch. Even a severe packing leak for a stem this size would present a very small leakage path. The packing of these valves is normally subjected to pressure in excess of 1000 psi, and routine visual inspection by the Auxiliary Operator should detect any packing leakage.

Gate valve numbers G16-F003 and G16-F019 are the isolation for the Drywell Drains System. Both lines are drains from submerged sump pumps. These pumps remain underwater even when the sumps are pumped to the minimum level. Therefore, a water seal is maintained and any packing leakage would be water leakage.

Gate valve numbers E11-F021A and E11-F021B rely entirely on disc-to-seat leakage and packing integrity to ensure against gaseous leakage from primary containment. The valves are on lines connected directly to the ECCS ring header and would require extensive modification to test in the LOCA direction.

(3) Globe Valves. These globe valves are pressurized from beneath the disc during the local leak rate test. This is a more conservative direction because test pressure would try to lift the disc from its seat. However, testing from this direction leaves the packing isolated from test pressure.

Five globe valves are located inside the drywell. As a result, any leakage from the packing would still be inside primary containment. These valves are as follows:

B32-F019	B21-F022C
B21-F022A	B21-F022D
B21-F022B	

Eleven globe valves extend below minimum torus water level and, as such, have water seals. These valves are as follow:

E11-F024A	E41-F012	E51-F002
E11-F024B	E41-F022	E51-F001
E11-F015A	E41-F021	E51-F062
E11-F015B	E51-F019	

One Unit 2 globe valve, number G31-F042 ties into the feed water line which should remain flooded post-LOCA and, as such, also has a water seal. Additionally, leakage must escape past two check valves prior to this packing receiving LOCA pressure.

Two globe valves, numbers E11-F027A and E11-F027B are installed in lines open to primary containment atmosphere and would require extensive modification to test in the LOCA direction. Since the packing on these valves is normally exposed to drywell pressure only and the valve is cycled only for testing, total packing failure is unlikely. An additional conservatism is that LLRTs are conducted by pressurizing between the two isolation valves. Therefore, recorded leakage may be greater than would actually occur during a LOCA. Additionally, Technical Specifications allow for 40 percent degradation prior to exceeding containment allowable leakage limits.

(4) Plug Valves. The design of these valves is such that there is not leakage path around the stem. As a result, the LLRT reflects all possible leakage paths from containment. These valves on Unit 2 are as follows:

CAC-PV-1200B	CAC-PV-1211F
CAC-PV-1261	CAC-PV-1262
CAC-PV-1260	CAC-PV-1215E
CAC-PV-1231B	CAC-PV-1211E
CAC-PV-3440	CAC-PV-3439
CAC-PV-1225B	

These valves have been replaced on Unit 1. Similar modifications are planned for Unit 2 during the next refueling outage.

(5) Target Rock Solenoid Valves. These electric solenoid valves have seal welded bonnets and no leakage path around the stem. LLRT leakage reflects all possible leakage paths from containment. Valves affected are valve numbers CAC-SV4541 and CAC-SV-4550.

(6) Butterfly Valves. These valves have an offset disc stem arrangement which places the packing on one side of the seating surface. Only those with packing facing the containment side of the disc are of potential concern. Based on previous ILRT testing, these valve packings have not presented a significant leakage concern. These valves on Unit 2 are as follows:

CAC-V5	CAC-V7	CAC-V16	CAC-V49
CAC-V6	CAC-V9	CAC-V17	

The Unit 1 valves have been reoriented and the packing is outboard of the disc. Similar reorientation is planned for Unit 2 during the next refueling outage.

(7) Summary

The licensee failed to identify E11-F015A (24 inch gate), E11-F015B (24 inch gate), E21-F005A (10 inch gate) and E21-F005B (10 inch gate) in their study of valves tested in non-LOCA directions as identified in PT Nos. 20.3.111, 20.3.112, 20.2.142, and 20.3.143, respectively.

The licensee has committed to submit a report to NRR including justification and evaluation for testing isolation valves in the reverse direction. The above valves will be listed in their report. This item will be identified as IFI 325, 324/85-31-01 Isolation Valves Local Leak Rate Tested in the Reverse (Non-LOCA) Direction.

Within the areas inspected, no violations or deviations were identified.

6. Type A Test Sequence and Description (61719) (90713)

Pressurization of containment commenced at 2049 hours on September 23, 1985. At 2230 hours the Personnel Airlock outer door seal was found to be leaking. The seal was repaired at 0305 hours on September 24 and pressurization continued. Containment test pressure was attained at 0511 hours on September 24, 1985, at which time the stabilization period began. During pressurization, stabilization and the next several hours an extensive leakage investigation revealed only minor seat or packing leakage on the following valves:

E41 - F012
E11 - F027A

At 1130 hours on September 24, 1985, the licensee met the containment stabilization criteria as established in BN-TOP-1 1972 Revision 1, Section 2.3.A.1, which states: "The rate of change of average temperature is less than 1.0°F/hour averaged over the last two hours".

At 1200 hours on September 24, 1985 the licensee began the ILRT. The reactor vessel level had been dropping at approximately 0.6 inches per hour, at 1435 hours the Control Rod Drive cooling water pumps were isolated in an attempt to stop the leakage. The leak continued and the licensee subsequently determined that the leakage path was into containment and would not effect the test results. At 1610 hours on September 24, 1985, the licensee halted the test and increased the reactor vessel level to 211 inches. The test was restarted at 1645 hours on September 24, 1985.

At 0600 hours on September 25, 1985, the ILRT met all the acceptance criteria established in BN-TOP-1 Section 2.3.B, for test termination as noted below:

Criteria B.1 The trend report based on total time calculations was less than maximum leakage rate allowable (Note: BN-TOP-1 Section 2.3.B.1, indicated the maximum allowable leakage is La. However, 10 CFR 50 Appendix J, which was issued subsequent to BN-TOP-1, reduces this to 0.75La. In cases where there is conflict between test methods and the regulations, the regulations govern).

Seventy-five percent of the maximum allowable leakage rate (0.75 La) for Unit 1 is 0.375 % weight/day. The preliminary test results indicated the leakage rate calculated to be 0.3635% weight/day which was obtained by adding the Type C penalty of 0.008% weight/day to the measured leak rate of 0.3555% weight/day.

Criteria B.2 The end of the test upper confidence limit for the calculated leak rate based on total time was less than 0.75La (note discussion in Criteria B.1) including the as-found leakage and the type B and C leakage penalties.

The upper confidence limit for the calculated leak rate based on total time was 0.3635% weight/day. (Note discussion in criteria B.1).

Criteria B.3 The mean of the measured leak rates based on total time calculations over the last points was below 0.75La (note discussions in Criteria B.1).

Criteria B.4 Data was recorded at equal 15 minute intervals.

Criteria B.5 The 13.25 hour test provided more than the minimum (20) data sets require by BN-TOP-1.

Criteria B.6 The test duration of 13.25 hours exceeded the minimum requirements of BN-TOP-1.

At 0600 hours on September 25, 1985, the one hour stabilization period prior to the supplemental test was started. At 0700 hrs the supplemental test began. At 1345 hrs on September 25, 1985, the supplemental test acceptance criteria of BN-TOP-1 Section 2.3.C was met.

Criteria C.1 At 0700 hrs on September 25, stabilization for the superimposed verification test was completed. The stabilization period of one hour met requirement of BN-TOP-1.

Criteria C.2 The verification test duration was 6.75 hours, was concluded at 1345 hours on September 25 and exceeded the minimum required duration of 6.63 hours.

Criteria C.3 The resulting measured verification leakage agreed within 25% of the calculated leakage.

Synopsis of Unit 1 Type A Test

(September 23-25, 1985)

September 23, 1985

2049 Commenced Pressurization

2230 Personnel Airlock outer seal was leaking. Pressurization continued during repair.

September 24, 1985

0305 Personnel Airlock outer seal declared operable

0511 Attained test pressure

0545 Stabilization period began

1200 Commenced test

1435 Control rod drive cooling water pumps isolated

1610 Began reactor vessel level increase

1638 Reactor vessel level at 210 inches

1645 Test restarted

September 25, 1985

0600 ILRT portion of PT 20.5 is completed satisfactorily. Verification test stabilization commenced

0700 Verification test commenced

1345 Verification test complete

1405 Depressurization began

7. Previously Identified Inspector Followup Items (IFI)

a. (Closed) IFI 325/81-13-03, Post Test Calibration Verification Program. Periodic Test PT-20.5 Integrated Primary Containment Leak Rate Rest (IPCLRT) states that all test measuring equipment must be calibrated within six months of performance of the test. The verification test also indicates if the test equipment remained in calibration for the duration of the test. IFI 325, 324/81-13-01 is closed.

b. (Closed) IFI 325, 324/82-21-02, Identify and Correct Miscellaneous Leakages Not Quantified by Type C Testing. Miscellaneous leakages, not identified or quantified during Type C testing, were identified while performing the Type A testing. The most significant leakage paths being (1) the missing gagging bolt for relief valve E11-F055A and (2) the flow orifice for CAC-FT-2686. In a letter to NRC Region II, serial number: BSEP/82-1988, the licensee performed a review and has taken or committed to corrective actions to quantify or eliminate these leakage paths. IFI 325, 324/82-21-02 is closed.

c. (Closed) IFI 325, 324/82-38-02, Changes to Pipe Supports and Restraints. The licensee has deleted Table 3.7.5-1 from Units 1 and 2 Technical Specifications. Deletion of the Table, which lists safety-related snubbers, eliminates the need for TS amendments to incorporate changes in the snubber listing. This change is in accordance with guidance issued to the licensees in NRC Generic Letter 84-13, dated May 3, 1984, subject: Technical Specification for Snubbers (Generic Letter 84-13). Any changes in snubber quantities, types or locations would be a change to the facility, such changes would be subject to the provisions of 10 CFR 50.59. The inspectors reviewed the licensee's Regulation Change Instruction RCI-03.1, which

meets the provisions of 10 CFR 50.59 for reporting changes to the facility. IFI 325, 324/82-38-02 is closed.

d. (Closed) IFI 324, 325/84-28-01 Review of the September 1984 Unit 2 Type A Test Results and the Licensee's Proposed Test Schedule. The Type A test is considered a failed test becuase it did not meet the acceptance criteria in Appendix J paragraph III.A.1.(a), which states that during the performance of the test no repairs or adjustments shall be made so that the containment can be tested in as close to the "as is" condition as possible. The licensee identified and isolated a water leak path from the RHR pump suction and discharge lines to the RHR sump through 4-inch drain valves. This failure was the third consecutive Unit 2 Type A failure. The licensee acknowledged that the subsequent test dates must be in accordance with Appendix J paragraph III.A.6.(b) which states that if two consecutive Type A tests fail to meet the applicable test criteria, a Type A test shall be performed at each plant shutdown for refueling or approximately every 18 months, whichever occurs first, until two consecutive Type A tests meet the acceptance criteria. The licensee has committed to this test schedule. IFI 324, 325/84-28-01 is closed.