

of Grand Gulf" would best be met by a plant specific submittal. The staff agreed to review the licensee's proposal in the context of the ongoing rulemaking activities. In SECY 94-036, dated February 17, 1994, the staff informed the Commission that it would review the Grand Gulf proposal because of its potential usefulness in the rulemaking process due to its scope and the technical information it provides.

Testing methods were not included in the scope of the licensee's proposal. The licensee proposed changes to the frequency of testing only. The staff has reviewed the licensee's proposed exemption. The staff's safety evaluation is enclosed.

III

The licensee proposed changes to the frequency of performing Type A, B, and C tests including changes to the frequency of leakage rate testing of air locks. The test frequencies will be determined individually for each component based on previous performance. The licensee presented plant specific data and plant specific risk analyses to support the proposed changes. In addition to information supplied by the licensee, the staff, in reviewing this exemption request, utilized technical information available from the on-going Appendix J rulemaking, including NUREG-1493 "Performance-Based Containment Leak-Test Program", dated December 1994. This rulemaking will also revise the frequency of leakage rate testing so that the intervals between tests is a function of individual component performance.

Because an Appendix J rulemaking is in progress, this exemption shall be valid until startup following Refueling Outage 9.

IV

A Type A test assures that the overall or integrated leakage rate from the whole containment is below the acceptance criterion specified in Appendix J. This exemption does not change this value. Appendix J presently specifies the test frequency for a Type A test as a set of three tests, at approximately equal intervals during each 10-year service period. The licensee proposes to change the test frequency to one Type A test in 10 years. Both an analysis of the test results from operating reactors over an extended period (NUREG-1493) and a risk analysis (EPRI TR-104285, "Risk Impact Assessment of Revised Containment Leak Rate Testing Intervals") support extending the Type A test interval to once in 10 years.

The staff proposed that the exemption include a precondition before extending the Type A test. Two consecutive Type A tests must be successful before the interval is extended. This is included in the exemption. By letter dated April 18, 1995, the licensee agreed to this change. The following exemption is granted until startup from Refueling Outage (RFO) 9, currently scheduled for Spring 1998.

Exemption From Section III.D.1(a)

Type A tests shall be performed on a 10-year interval provided that the two previous consecutive Type A tests, performed on the test interval specified in Appendix J (three tests, at approximately equal intervals in a 10-year period), have been successful.

If a Type A test is failed, and the failure is not due to a Type B or C component, acceptable performance must be reestablished by performing a Type A test within 48 months of the unsuccessful Type A test. Following a successful Type A test, the surveillance frequency may be returned to once per 10 years.

In addition, the licensee must perform general inspections of the accessible interior and exterior surfaces of the containment structures, as specified in Section V.A of Appendix J, at the test interval specified in Appendix J for Type A tests, even when no Type A test is required during that outage. By letter dated April 18, 1995, the licensee agreed to this change.

There is no relationship between Type A testing and the inservice inspection (ISI) service period. This exemption will continue in effect until startup from RFO 9.

V

The licensee proposed an exemption from Sections III.D.2(a) and III.D.3 of Appendix J to permit Type B and C testing to be done based on previous performance of a component. The licensee presented data and analyses to show that the risk from using a performance-based approach to Type B and C testing is negligible. This is in agreement with the conclusions of NUREG-1493.

The licensee proposed that the test interval be determined as follows: (1) One successful test or a failure would require maintaining the present test interval of 2 years. (2) Two successful consecutive tests would permit extending the test interval to five years. (3) Three successful consecutive tests would result in increasing the test interval to 10 years. The staff does not agree with a 10-year interval. It is the staff's judgment that the licensee has not

justified the 10-year interval to the same degree of confidence as the 5-year interval. By letter dated April 18, 1995, the licensee agreed to this change.

In addition, there are certain valves which the staff considers to be so safety significant that the test interval for these valves should not be extended without prior staff review and approval. The staff has specified these valves in the exemption. By letter dated April 18, 1995, the licensee agreed to this change.

Exemption From Sections III.D.2(a) and III.D.3 of Appendix J

After two successful consecutive tests, performed at the present Appendix J test interval of no more than 2 years, a Type B or C component may be tested once every 5 years. If this test or a subsequent test is a failure, the test interval for this component shall revert to a 2-year interval until the component passes two consecutive tests. The 5-year interval may then be resumed. By letter dated April 18, 1995, the licensee agreed to this change.

Main steam isolation valves, feedwater valves and containment system supply and exhaust isolation valves shall remain on a 2-year test interval. Any change will require prior review and approval by the NRC. This exemption will continue in effect until startup from RFO 9.

VI

The licensee proposed to increase the test intervals for air locks based on the good performance of the air locks at Grand Gulf. The licensee's August 13, 1993, submittal provides a summary of test data which shows excellent performance in both air lock and air lock door seal testing.

The staff proposed an addition to the requested exemption to account for the contingency that the performance may not be maintained at this high level. If an air lock fails a test, the extended interval would revert to the Appendix J test intervals until two consecutive successful's tests demonstrate that the problem has been resolved. By letter dated April 18, 1995, the licensee agreed to this change.

Exemption From Section III.D.2(b)(i) and (b)(iii)

Air locks may be leakage rate tested at intervals of no more than 2 years. If an air lock fails a leakage rate test, the air lock shall then be required to pass two consecutive leakage rate tests at a test interval of 6 months prior to returning to the 2-year test interval. During a period of frequent opening of air lock doors, the air locks shall be tested at least every 30 days. If an air