Inquiry:
A Korean operator has not conducted a seal leak test for the opening of a door after an airlock test while primary containment integrity is required, based on the following statement in Paragraph 3 of Section 3.3.4.2, Airlocks:

“Opening of the airlock for the purpose of removing airlock testing equipment following an airlock test does not require further testing the airlock.”

The asymmetry of understanding is that the exemption on “testing the airlock” does also mean an exemption on a seal leak test for the opening of a door to remove testing equipment after an airlock test contrary to the below requirement in Paragraph 2 of Section 3.3.4.2:

“If an airlock door is opened while primary containment integrity is required, the seals on that door shall be tested not more than 72 hours after such opening.”

Please clarify the exemption criteria for the aforementioned.

Response:
These are two separate requirements, each made for a different purpose. The intent of the exemption statement in Section 3.3.4.2, “Opening of the airlock for the purpose of removing airlock testing equipment following an airlock test does not require further testing the airlock” is to eliminate the unworkable condition that would require the reinstallation of the test equipment to perform a test due to the door being opened solely for the removal of such equipment. It assumes that the test equipment was disconnected and removed without causing any degradation that could impact leakage other than opening and closing of the airlock door.

The requirement for doors to be tested not more than 72 hours after an entry during periods while containment integrity is required was written so that during times when multiple frequent entries are made, testing of the seals need not be required more frequently than once per 72 hours.