

John K. Wood  
Vice President, Nuclear

440-280-5224  
Fax: 440-280-8029

August 7, 2000  
PY-CEI/NRR-2510L

United States Nuclear Regulatory Commission  
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Perry Nuclear Power Plant  
Docket No. 50-440  
Supplement to a License Amendment Request Pursuant to 10CFR50.90: Revision of  
Required Action for Technical Specification 3.9.1, "Refueling Equipment Interlocks"

Ladies and Gentlemen:

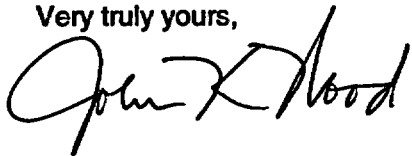
This letter supplements a license amendment request dated August 4, 1999 (PY-CEI/NRR-2418L). The August 4 letter requested revision of the Required Actions for Technical Specification 3.9.1, "Refueling Equipment Interlocks", providing new Required Actions when the refueling interlocks are inoperable. This supplement revises the new Required Action A.2.2, such that it will require the operator to "Verify all control rods are fully inserted", rather than just verifying rods are inserted "in core cells containing one or more fuel assemblies". The revised, more restrictive wording of Action A.2.2 will ensure that if fuel is being loaded with any control rods withdrawn (in accordance with the provisions of LCO 3.10.6.c), the refueling interlocks will be required to be Operable. This will eliminate the possibility of a reloading error in cells which are not protected by refueling interlocks or an inserted control rod.

The original license amendment request was consistent with a Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-225. In parallel with submittal of this supplement for the Perry Nuclear Power Plant, the Task Force is processing a new TSTF to replace TSTF-225.

The Significant Hazards Consideration provided with the August 4, 1999 letter and published in the Federal Register on August 25, 1999, was determined to bound this more conservative revised request, and to not require any changes to address this revised request.

There are no regulatory commitments contained in this letter. If you have questions or require additional information, please contact Mr. Gregory A. Dunn, Manager - Regulatory Affairs, at (440) 280-5305.

Very truly yours,



cc: NRC Project Manager  
NRC Resident Inspector  
NRC Region III  
State of Ohio

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