

John K. Wood  
Vice President, Nuclear440-280-5224  
Fax: 440-280-8029February 1, 2001  
PY-CEI/NRR-2541LUnited States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555Perry Nuclear Power Plant  
Docket No. 50-440  
Reaffirmation Of Commitment To Not Remove The Inclined Fuel Transfer System Blind Flange  
In MODE 1, 2, Or 3 Until Additional Administrative Controls Are Developed And Implemented

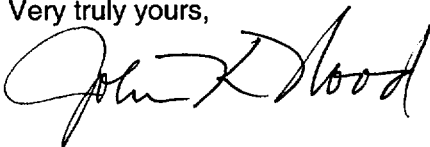
Ladies and Gentlemen:

In previous correspondence, it was noted that a review by the Perry Independent Safety Engineering Group (ISEG) had identified issues with a Technical Specification allowance to remove a blind flange in the Inclined Fuel Transfer System (IFTS) when the plant is in MODE 1, 2, or 3. This was documented in Licensee Event Report 2000-001 dated February 14, 2000, and a letter dated March 3, 2000 (PY-CEI/NRR-2469L). Both letters noted that administrative controls are in place to prevent removal of the blind flange at power until these issues are resolved. The March letter also noted that if the ongoing re-evaluation of the issues determined that a license amendment is necessary, an amendment request would be submitted for Nuclear Regulatory Commission (NRC) review and approval. Documentation of the engineering justification for use of IFTS in MODES 1, 2, and 3 was scheduled for completion prior to Refueling Outage (RFO) 8, in the spring of 2001.

Reviews completed to date indicate that a License Amendment Request will be submitted to the NRC to resolve the identified issues. The engineering justifications will be completed following RFO8 to support use of the allowance for the following refuel outage, RFO9. This will include determination of the appropriate administrative controls to allow removal of the blind flange, e.g., risk-informed time limitations on flange removal. In the interim, the commitment to administrative controls preventing removal of the blind flange in the above listed modes is reaffirmed. Flange removal will not be permitted except during plant outages until the justifications are completed, and NRC approval of a license amendment is obtained, as necessary. This is considered acceptable, since the IFTS blind flange Technical Specification allowance is not one that could be mistakenly used by an operator during an emergent event or condition; it requires advanced planning and significant work activities to remove the blind flange. The current administrative controls on the IFTS flange adequately prevent removal of the flange in the above listed modes.

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

A001