



FirstEnergy Nuclear Operating Company

50-440

Perry Nuclear Power Plant
10 Center Road
Perry, Ohio 44081

John K. Wood
Vice President, Nuclear

440-280-5224
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March 16, 2001
PY-CEI/OEPA-0349L

Ohio Environmental Protection Agency
Northeast District Office
Attention: Mr. Dennis Lee
2110 E. Aurora Rd.
Twinsburg, OH 44087-1969

Ladies and Gentlemen,

In accordance with Ohio Environmental Protection Agency (OEPA) Permit No. 3IB00016*ED, this letter serves as confirmation of a telephone report of a prior notice of the need for a bypass per Part III, Section 11.B.

The OEPA Northeast District Office was called at 13:30 on 3/13/01. Ms. Donna Benz of FirstEnergy Corporation spoke to Mr. Dennis Lee of the OEPA. Ms. Benz explained that the Perry Nuclear Power Plant (PNPP) is currently involved in a refuel outage. Scheduled work involved the draining and maintenance of the circulating water system. This included the repair of previously identified leaks. Just prior to refilling the system with water, inleakage of groundwater was noticed. The amount of inleakage is estimated to be about 1 gallon per hour. Based on technical input from plant engineering personnel, the estimated outleakage during pressurized operation of the system "as is" is expected to be a maximum of 4 to 5 gallons per hour. This system is chlorinated daily, with a maximum concentration of 1 ppm free available chlorine. Since the NPDES permit allows for only 120 minutes of chlorination, 10 gallons per day would be water treated with chlorine, which would bypass the normal outfall. Ms. Benz requested that PNPP be granted permission to operate under these circumstances.

Mr. Lee inquired as to why PNPP does not repair the system prior to refilling. The location of this leak is inside a transition area from concrete to metal. The technology available for immediate repair involves drilling into the adjacent concrete and injecting a sealant material. The risk is that the sealant will cause further damage to the underground concrete structure as it expands, which would increase the risk of environmental impact. Delaying the repair until the next opportunity will allow time to do the appropriate engineering analysis/studies. This would provide for the most effective repair and satisfy Nuclear Regulatory Commission design requirements. The PNPP is committed to


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repairing this leak no later than the end of refuel outage 11 (RFO-11). This commitment will be tracked in the Plant Commitment Tracking System.

Mr. Lee agreed that the system could be operated in its current state, provided that the repairs are ultimately performed, either at RFO-11 or during the next scheduled maintenance, which would accommodate this repair. He requested a follow-up letter explaining the problem, referring to this telephone discussion and committing to the repair.

If you have any questions or require additional information, please contact Mr. Leo Harte at (440)-280-5514.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "John K. Hood". The signature is fluid and cursive, with the first name "John" and last name "Hood" clearly distinguishable.

cc: NRC Region III
NRC Resident Inspector
NRC Project Manager
NRC Document Control Desk (Docket No. 50-440)