



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 16, 2012

Mr. Vito A. Kaminskis  
Site Vice President  
FirstEnergy Nuclear Operating Company  
Perry Nuclear Power Plant  
Mail Stop A-PY-A290  
P.O. Box 97, 10 Center Road  
Perry, OH 44081-0097

SUBJECT: PERRY NUCLEAR POWER PLANT, UNIT NO. 1 - REQUEST FOR  
ADDITIONAL INFORMATION RELATED TO REQUEST FOR ALTERNATIVE  
EXAMINATION REQUIREMENTS FOR AMERICAN SOCIETY OF MECHANICAL  
ENGINEERS CLASS 1 PIPING WELDS (TAC NO. ME7654)

Dear Mr. Kaminskis:

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated November 14, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML113180450), FirstEnergy Nuclear Operating Company (FENOC) submitted a proposed alternative pursuant to Title 10 of the *Code of Federal Regulations*, Section 50.55a(a)(3) for the Perry Nuclear Power Plant (PNPP), Unit No. 1.

Specifically, FENOC requests NRC approval for the continued use of the PNPP risk-informed inservice inspection program, relative to certain non-destructive examination requirements associated with American Society of Mechanical Engineers Class 1 piping welds.

The NRC staff is reviewing your submittal and has determined that additional information is required to complete the review. The specific information requested is addressed in the enclosure to this letter. During a discussion with your staff on June 12, 2012, it was agreed that you would provide a response within 30 days from the date of this letter.

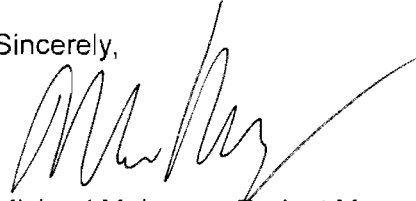
The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources.

V. Kaminskas

-2-

If circumstances result in the need to revise the requested response date, please contact me at (301) 415-3867 or [Michael.mahoney@nrc.gov](mailto:Michael.mahoney@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Mahoney', with a long, sweeping horizontal line extending to the right.

Michael Mahoney, Project Manager  
Plant Licensing Branch III-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-440

Enclosure:  
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

PERRY NUCLEAR POWER PLANT, UNIT NO. 1

DOCKET NO. 50-440

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the November 14, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML113180450), proposed alternative pursuant to Title 10 of the *Code of Federal Regulations*, Section 50.55a(a)(3) for the Perry Nuclear Power Plant, Unit No. 1, submitted by FirstEnergy Nuclear Operating Company.

The NRC staff has determined that the following information is required in order to complete its review:

1. The submittal indicates that a full-scope peer review was performed in 1997 for the internal events probabilistic risk assessment (PRA) and gap or self-assessments have been performed periodically since the 1997 peer review. The submittal also indicates that the PRA model has been revised periodically and some of these revisions included changes to address findings from the 1997-related review and self-assessments.
  - a. Regarding any changes since the independent full-scope peer review characterized as a PRA upgrade per American Society of American Mechanical Engineers (ASME)/American Nuclear Society (ANS)-RA-Sa-2009, identify if a focused-scope peer review was performed for these changes consistent with the guidance in ASME/ANS-RA-Sa-2009, as endorsed by NRC Regulatory Guide 1.200, and describe any findings from that focused-scope peer review and the resolution of these findings for this application.
  - b. If a focused-scope peer review has not been performed for changes characterized as a PRA upgrade, describe what actions will be implemented to address this review deficiency. State when the application will be supplemented to describe any findings from that focused-scope peer review and the resolution of these findings for this application.
2. The submittal indicates that the licensee's PRA model does not include large early release frequency (LERF). Although a bounding analysis may meet the criteria set forth in the standard, this does not account for high LERF values that may exist and could have an impact on conditional large early release probability (CLERP). Provide the analysis of CLERP based on a realistic approach to LERF calculation.
3. In a prior risk-informed inservice relief request submitted on February 12, 2001, the licensee used a Level 2 PRA to perform LERF calculations and produced a table highlighting the change in risk for both core damage frequency and LERF when compared to the last deterministic ASME Section XI program. Provide delta risk calculations for both core damage frequency and LERF on a system and total basis when compared to the last deterministic ASME, Section XI, program for NRC staff consideration.

Enclosure

If circumstances result in the need to revise the requested response date, please contact me at (301) 415-3867 or [Michael.mahoney@nrc.gov](mailto:Michael.mahoney@nrc.gov).

Sincerely,

/ **RA** /

Michael Mahoney, Project Manager  
Plant Licensing Branch III-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-440

Enclosure:  
Request for Additional Information

cc w/encl: Distribution via Listserv

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ADAMS Accession No. ML12167A313

\*By Memo Dated

NRR-088

OFFICE	LPL3-2/PM	LPL3-2/LA	DRA/APLA/BC	LPL3-2/BC	LPL3-2/PM
NAME	MMahoney	SRohrer	DHarrison	JZimmerman	MMahoney
DATE	7/09 /12	7/ 09/12	5/30/12*	7/12 /12	7/ 16/12

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