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November 9, 2016
L-16-326

10 CFR 50.54(f)

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

SUBJECT:

Perry Nuclear Power Plant

Docket No. 50-440, License No. NPF-58

Response to Request for Additional Information Regarding the Near-Term Task Force (NTTF) Recommendation 2.1 Flood Hazard Reevaluation Report (CAC No. MF6099)

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued a letter titled, "Request for Information Pursuant to Title 10 of the *Code of Federal Regulations* 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident" [Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340], to all power reactor licensees and holders of construction permits in active or deferred status. Enclosure 2 of the 10 CFR 50.54(f) letter addresses NTTF Recommendation 2.1 for flooding. One of the required responses is for licensees to submit a Hazard Reevaluation Report (HRR) in accordance with the NRC's prioritization plan. By letter dated May 11, 2012 (ADAMS Accession No. ML12097A509), the NRC placed the Perry Nuclear Power Plant (PNPP) in Category 3 requiring a response by March 12, 2015. The flood HRR for PNPP was submitted by letter dated March 10, 2015 (ADAMS Accession No. ML15069A056). By letter dated March 24, 2016 (ADAMS Accession No. ML16084A871), FirstEnergy Nuclear Operating Company (FENOC) submitted Revision 1 of the PNPP flood HRR that reflected plant and modeling changes, including major physical modifications to the streams and watersheds at the site.

As part of the NRC audit described by letter dated June 8, 2015 (ADAMS Accession No. ML15153A145), the NRC staff requested that two copies of the model input/output files and model runs used for the added streams and rivers flooding analyses in the PNPP flood HRR, Revision 1, be transmitted by letter to the NRC. The requested input/output files are provided in their native file format on the enclosed hard drives. Each hard drive contains one copy of the electronic information for the following calculations.

AD10
NRR

- 50:31.000, *PNPP GIS Analysis for Effects of LIP*, Revision 0
- 50:33.000, *PNPP Stream Modification PMF*, Revision 0
- 50:58.000, *PNPP Stream Modification Berm Failure Analysis*, Revision 0
- 50:61.000, *PNPP Stream Modification Shore Protection*, Revision 0
- 50:62.000, *PNPP Major Stream Rail Modification PMF*, Revision 0
- 50:63.000, *PNPP Major Stream Access Road Modification Probable Maximum Flood*, Revision 0
- 50:66.000, *PNPP Site Modifications Beyond Design Basis Local Intense Precipitation*, Revision 0

In September 2016, an error in the FLO-2D model software was identified. The error impacts the analyses, specifically at the interaction between surface and subsurface drainage related to local intense precipitation (LIP). The investigation of this issue is ongoing; however, preliminary model runs of an updated model have shown that the overall magnitude of differences between the old data and new data for the beyond-design-basis (BDB) LIP analyses are small. As a result of these preliminary runs, it is expected that there will be no significant impact to the BDB LIP results. FENOC intends to address the final outcome of this error correction and provide the results of the reevaluated flood hazard analyses in the flooding mitigating strategy assessment.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Thomas A. Lentz, Manager – Fleet Licensing, at 330-315-6810.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 9, 2016.

Respectfully,



David B. Hamilton

Enclosure:

Hard drive with electronic information (2 hard drives provided)

cc: Director, Office of Nuclear Reactor Regulation (NRR)
NRC Region III Administrator
NRC Resident Inspector
NRR Project Manager

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Hard drive with electronic information
(2 hard drives provided)