

## NRR-DMPSPeM Resource

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**From:** Green, Kimberly  
**Sent:** Wednesday, December 13, 2017 3:41 PM  
**To:** Lashley, Phil H. (phlashley@firstenergycorp.com)  
**Subject:** Draft RAI for Perry LAR to Revise TSs for AST  
**Attachments:** Revised Draft RAI.docx

Dear Mr. Lashley:

By letter dated June 8, 2017, FirstEnergy Nuclear Operating Company (FENOC) submitted an amendment request for Perry Nuclear Power Plant, Unit No. 1 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17159A720). The proposed amendment would modify several technical specifications to implement the final phase of alternative source term.

The U.S Nuclear Regulatory Commission (NRC) staff is reviewing your submittal and has identified an area where additional information is needed to complete its review. Attached, please find a draft request for additional information (RAI).

The draft RAI is being sent to ensure that the request is understandable and the regulatory basis for the request is clear. This email and the attachment do not convey or represent an NRC staff position regarding the FENOC's request.

Please let me know if FENOC needs a call to clarify the staff's request.

Sincerely,  
Kimberly Green  
(301) 415-1627  
[kimberly.green@nrc.gov](mailto:kimberly.green@nrc.gov)

**Hearing Identifier:** NRR\_DMPS  
**Email Number:** 81

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**Subject:** Draft RAI for Perry LAR to Revise TSs for AST  
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**Received Date:** 12/13/2017 3:40:00 PM  
**From:** Green, Kimberly

**Created By:** Kimberly.Green@nrc.gov

**Recipients:**  
"Lashley, Phil H. (phlashley@firstenergycorp.com)" <phlashley@firstenergycorp.com>  
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DRAFT REQUEST FOR ADDITIONAL INFORMATION

FIRSTENERGY NUCLEAR OPERATING COMPANY

PERRY NUCLEAR POWER PLANT, UNIT 1

DOCKET NUMBER 50-440

CAC NUMBER MF9818; EPID L-2017-LLA-0241

By application dated June 8, 2017, FirstEnergy Nuclear Operating Company (FENOC), submitted a license amendment request (LAR) for Perry Nuclear Power Plant, Unit No. 1 (PNPP). The amendment would revise the technical specifications (TSs) to adopt TS changes provided by TSTF-522 and align with the licensing basis with changes provided by Amendment 166. Among the changes, the amendment would delete TS 3.7.8, "Fuel Handling Building," and TS 3.7.9, "Fuel Handling Building Ventilation Exhaust System."

Title 10 of the *Code of Federal Regulations*, Section 50.36, requires, in part, that a limiting condition for operation (LCO) be established for items that meet one or more of the criteria listed. In the LAR, you stated that the Bases for TS 3.7.8 and TS 3.7.9 currently cite criterion 3 and 4.

FENOC concluded that the deletion of TS 3.7.8 and TS 3.7.9 is acceptable for several reasons, including the fuel handling building (FHB) and fuel handling building ventilation exhaust system (FHBES) are not credited in mitigating the consequences of a fuel handling accident in the FHB, and FENOC does not intend to revise the existing accident analyses; therefore, the FHB and FHBES no longer meet the 10 CFR 50.36 criteria for establishing a TS LCO.

However, on page 7 of the Evaluation of Proposed License Amendment, FENOC stated that, "[t]he FHB will remain categorized as a safety-related, Seismic Category I structure and the FHBES will remain a safety-related, Seismic Category I system."

Because the FHB and FHBES will no longer be governed by TSs, please describe how they will be maintained as safety-related and seismic category I structure and system. Also describe the change control process that applies to any future changes to the FHB and FHBES.