

NRR-DMPSPeM Resource

From: Green, Kimberly
Sent: Monday, January 08, 2018 8:10 AM
To: Lashley, Phil H. (phlashley@firstenergycorp.com)
Cc: Lentz, Thomas A. (Licensing) (talentz@firstenergycorp.com)
Subject: Final RAI for Perry LAR Related to AST Implementation
Attachments: Final 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 the request for additional information (RAI).

A draft RAI was previously transmitted to you by email dated December 13, 2017. At your request, a clarification call was held on January 3, 2018, to clarify the NRC staff's request. As a result of the call, the NRC staff has revised the wording to make the request more clear. A response is requested within 30 days from the date of this email.

The NRC staff considers that timely responses to RAIs help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1627.

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

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Received Date: 1/8/2018 8:10:00 AM
From: Green, Kimberly

Created By: Kimberly.Green@nrc.gov

Recipients:

"Lentz, Thomas A. (Licensing) (talentz@firstenergycorp.com)" <talentz@firstenergycorp.com>
Tracking Status: None
"Lashley, Phil H. (phlashley@firstenergycorp.com)" <phlashley@firstenergycorp.com>
Tracking Status: None

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MESSAGE	1396	1/8/2018 8:10:00 AM
Final RAI.docx	19668	

Options

Priority: Standard
Return Notification: No
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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 what activities will continue to be performed to maintain them as safety-related and seismic category I structure and system. Also describe the change control process that applies to these activities and any future changes to the FHB and FHBES.