

January 30, 2018

L-18-023

10 CFR 50.90

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT:

Perry Nuclear Power Plant
Docket No. 50-440, License No. NPF-58
Response to Request for Additional Information Regarding a Request to Amend the
Technical Specifications (CAC No. MF9818; EPID L-2017-LLA-0241)

By correspondence dated June 8, 2017 (Accession No. ML17159A720), FirstEnergy Nuclear Operating Company (FENOC) submitted a request to amend several Technical Specifications, which would implement aspects of alternative source term at the Perry Nuclear Power Plant.

By electronic mail dated January 8, 2018 (Accession No. ML18009A011), the Nuclear Regulatory Commission (NRC) requested additional information to complete its review. FENOC's response to this request is attached.

There are no regulatory commitments contained in this submittal. 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 January 30, 2018.

Sincerely,



David B. Hamilton

Attachment: Response to January 8, 2018 Request for Additional Information

cc: NRC Region III Administrator
NRC Resident Inspector
NRC Project Manager
Branch Chief, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
Utility Radiological Safety Board

Attachment
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Response to January 8, 2018 Request for Additional Information
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By correspondence dated June 8, 2017, FirstEnergy Nuclear Operating Company (FENOC) submitted a license amendment request for Nuclear Regulatory Commission (NRC) review and approval. By electronic mail dated January 8, 2018, NRC staff requested additional information to complete its review. The requested information is presented below in bold type, followed by the FENOC response.

Because the FHB [Fuel Handling Building] and FHBES [Fuel Handling Building Exhaust System] will no longer be governed by TSs [Technical Specifications], please describe what activities will continue to be performed to maintain them as safety-related and seismic category I structure and system.

Response:

Per the Perry Nuclear Power Plant (PNPP) Updated Safety Analysis Report (USAR), the FHB is a safety-related, seismic category I structure, and the FHBES is a safety-related, seismic category I system. Both the FHB and FHBES are governed by 10 CFR 50.65, "Requirements for monitoring the effectiveness of maintenance at nuclear power plants," and are included in the PNPP maintenance rule program. For the FHB, program-related inspections are performed by qualified staff every four years. For the FHBES, equipment performance is monitored daily by plant operators, and component monitoring (fan and motor vibration) is performed periodically, as necessary. Conditions adverse to quality that are entered into FENOC's corrective action program are evaluated for their effects on maintenance rule status and may increase the frequency of monitoring. Procurement of replacement components and performance of maintenance activities are done in accordance with safety-related, seismic category I requirements, as applicable. Changes to the USAR (license basis), maintenance rule program, procedures governing safety-related, seismic category I activities, or the FHB and FHBES safety-related, seismic category I design and license basis designations, are governed by FENOC's change control processes, as described below.

Also describe the change control process that applies to these activities and any future changes to the FHB and FHBES.

Response:

The FENOC procedure, "Evaluation of Changes, Tests and Experiments," implements the requirements of 10 CFR 50.59 at the Perry Nuclear Power Plant. This change control process would apply to any future changes to the FHB and FHBES. As described in the PNPP design and license basis, the FHB and FHBES are designated safety-related, seismic category I. As such, changes to the FHB and FHBES, including a departure from their safety-related, seismic category I design and license basis designations or related activities, would either require prior NRC approval or would be made in accordance with the allowances in 10 CFR 50.59. Additionally, as the FHB and FHBES are described in the PNPP USAR, changes would also be governed by FENOC's "Licensing Document Change Process," which implements the requirements of 10 CFR 50.71(e) and requires periodic revisions to be submitted to the NRC.