



FirstEnergy Nuclear Operating Company

Perry Nuclear Power Plant
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Frank Payne
Vice President

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November 27, 2019
L-19-214

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

SUBJECT:
Perry Nuclear Power Plant, Unit No. 1
Docket No. 50-440, License No. NPF-58
Open Phase Condition Industry Initiative

On March 22, 2016, the Nuclear Energy Institute (NEI) issued a Regulatory Summary Document, "Industry Position on Open Phase Conditions (OPC) in Electronic Power System which Lead to Loss of Safety Functions of both Offsite and Onsite Power Systems (NRC Bulletin 2012-01)" (Accession No. ML16091A099), that addressed the industry's open phase condition (OPC) detection initiative. The document summarized the industry position on the issue, which included the allowance for units with near term permanent shut down plans to provide the Nuclear Regulatory Commission (NRC) staff with alternatives to the industry initiative, if appropriate based on risk considerations.

FirstEnergy Solutions (FES) notified the NRC staff, in a letter dated April 25, 2018 (Accession No. ML18115A007), of its intention to permanently cease power operations at the Perry Nuclear Power Plant (PNPP), Unit No. 1, by May 31, 2021.

FES notified the NRC staff, in a letter dated November 19, 2018 (Accession No. ML18323A346), that the PNPP OPC detection equipment will remain in the monitor mode up until the respective shut down date, noting that the OPC equipment would not be placed in the trip mode of operation.

In a letter dated July 26, 2019 (Accession No. ML19207A097), FES formally withdrew its "Certification of Permanent Cessation of Power Operations" for PNPP. During the transition period to early shutdown, the OPC equipment was not placed in an automatic trip mode. FirstEnergy Nuclear Operating Company (FENOC) requires additional time to implement the OPC detection initiative actions at the PNPP. The purpose of this letter is to notify the NRC staff of changes to the implementation schedule for the OPC detection initiative for PNPP. Specifically, FENOC plans to implement the initiative at PNPP no later than December 31, 2020.

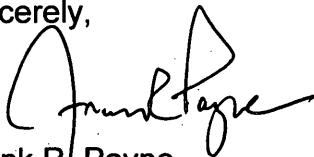
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FENOC intends to use a probabilistic risk assessment risk-informed evaluation to implement the open phase protection system (OPPS), to provide dedicated open phase annunciators to the control room operator to diagnose and respond to the presence of an OPC rather than putting the system into automatic trip mode. Operator training and procedure changes will also be required to implement this OPPS approach.

FENOC requires additional implementation time to complete the risk analysis in accordance with NEI 19-02, Rev 0, "Guidance for Assessing Open Phase Condition Implementation Using Risk Insights," dated May 2019, to complete associated procedure changes, and to complete training from the risk analysis insights. Also, FENOC requires additional time to complete the annunciator modifications, which includes wiring in the Unit 1 and Unit 2 Startup Transformer control panels, at the open phase units, and within the PNPP control rooms. Based on conditions noted above, FENOC expects to meet the OPC detection initiative actions by December 31, 2020.

There are no regulatory commitments contained in this submittal. If there are any questions, or if additional information is required, please contact Mr. Phil H. Lashley, Acting Manager - FENOC Nuclear Licensing and Regulatory Affairs, at (330) 315-6808.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank R. Payne", written over a horizontal line.

Frank R. Payne

cc: NRC Region III Administrator
NRC Resident Inspector – Perry
NRC Project Manager – Perry