

Attachment 3  
PY-CEI/NRR-1619L

PERRY NUCLEAR POWER PLANT

SAFETY EVALUATION SUMMARY

PURSUANT TO

10 CFR 50.59(b)(2)

1992

9303150186 930310  
PDR ADDCK 05000440  
R PDR

SE No.: 91-100

Source Document: SCN 00331 - ISS-2600

### Description of Change

This Specification Change Notice (SCN) for Installation Standard Specification 2600, revised item 5:07.1 to allow multiple snubbers to be removed on each analytical subsystem and to allow one snubber, required for containment integrity, to be removed and replaced within a seventy-two hour time period.

### Summary

- I. No. The temporary removal of non-deadweight permanent supports on an operable and/or in-service system has an overall negligible effect. The primary reason is the exceptional ruggedness of welded steel piping system under dynamic/cyclic loading as demonstrated by both laboratory testing and actual earthquake performance data gathered world-wide. In either case, piping stress conditions will be within design basis ASME code. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Snubbers only function during transient events (system or earthquake), while at other times they provide insignificant influence on the attached components. As such, temporary snubber removal, by itself, has no affect (adverse or otherwise) on the attached components during plant/system operation. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. As previously stated, temporary piping support removal has an overall negligible effect. Technical Specifications require an engineering evaluation to determine if the components to which an inoperable snubber was attached were adversely affected by the inoperable snubber in order to ensure that the components remain capable of meeting the designed service. This SCN allows a piping system to remain operable (and containment integrity), within the confines of the SCN criteria, while a snubber is inoperable (i.e., temporarily removed). Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.



SE No.: 91-104

Source Document: DCP 90-274, Rev. 0

Description of Change

This design change replaces a Control Rod Drive Hydraulic (C11) System check valve 1C11-F0122 from a swing check design to a piston/lift check design.

Summary

- I. No. This change enhances the C11 System's response characteristics with respect to minimizing containment leakage. The replacement check valve meets ASME III Standards and will be supplied with a soft seating surface to enhance the ability of the valve to seat at low differential pressures. The function and configuration of the C11 System did not change. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. As stated above, the replacement valve is manufactured and installed to ASME standards. The function and configuration of the C11 System did not change. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-110

Source Document: DCP 90-037, Rev. 0

### Description of Change

This design change installs a three-position switch in place of the existing two-position switch for the Extraction Steam Hot Water Heat Exchanger (HWHE) inlet isolation valve 1N36-F470. (Reference Safety Evaluation 90-019.)

### Summary

- I. No. This change installs a manual/auto control station within the control loop for 1N36-F470. A three-position control switch for this valve is installed in the Auxiliary Boiler control panel. This will enable the operator to monitor and control 1N36-F470, thereby permitting control of the HWHE water level during low heat loads for the Building Heating System. This change does not alter the function of N36-F470. Manual control of this valve will be administratively controlled. Further, the Building Heating System is nonsafety-related. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The Building Heating System is not described in the Technical Specifications. Hence, installation of this change will not reduce any margin of safety as defined in the bases for any Technical Specification.

SE No.: 91-111

Source Document: DCP 90-093, Rev. 0

### Description of Change

This design change replaces the two-coil Electrical Trip Solenoid Valve (ETSV) of the Electro-Hydraulic Control (EHC) subsystem of the Main Turbine with an improved finned single-coil type ETSV.

### Summary

- I. No. This change has not compromised the original design of the EHC Subsystem. The new solenoid has improved reliability for two reasons: the new solenoid has an improved fin design which allows a more effective heat transfer from the coil and the new solenoid eliminates the mechanical weakness, found in the dual-coil design, where the common electrical lead joins the two coils. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The new solenoid does not impact the Technical Specifications section on Turbine Overspeed Protection in any manner since operating logic failure modes and reliability are equivalent for this design change. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-118

Source Document: PTI-GEN-PO023, Rev. 0

### Description of Change

The purpose of this Periodic Test Instruction is to monitor the Zebra Mussel populations during spawning season in Lake Erie.

### Summary

- I. No. The installation of the test equipment interfaces with the Service Water (P41) System, Circulating Water (N71) System, Emergency Service Water (P45) System, and Fire Protection (P54) System. This Periodic Test Instruction (PTI) does not prevent any of the above systems from performing their design functions. Only qualified operators will be allowed to manipulate valves associated with the performance of this PTI. This instruction will not change the characteristics of the above named systems in any manner which would impact the safety of plant operation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. P41, N71, P45, and P54 Systems operations have not been affected. Test equipment failure could create a minor flooding event. However, this potential event is bounded by the flooding analyses contained in the USAR. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The P41, N71, P45, and P54 Systems have not been impacted. Failure of the test equipment is bounded by the flooding analyses contained in the USAR. Hence, the installation and use of the test equipment does not reduce the margin of safety defined in the Technical Specifications.

SE No.: 91-123, 92-052

Source Document: DCP 89-208, Rev. 0  
DCP 89-208, Rev. 2

### Description of Change

This design change modifies the Emergency Service Water (ESW-P45) System supply isolation valves, 1P45-F0014A/B and 1P45-FC068A/B, to the Residual Heat Removal System (RHR) Heat Exchangers to resolve seat leakage problem.

### Summary

- I. No. This change replaces the carbon steel valves with the same size stainless steel valves for the above mentioned ESW-P45 valves. This will ensure that the capability of placing the RHR heat exchangers in demineralized water wet lay up continues. The change does not alter the safety function of the ESW System. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change does not alter the function ability or operating characteristics of the ESW System. The new valves will function in exactly the same way as did the carbon steel valves. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The use of stainless steel valves to isolate the RHR heat exchangers cooling water supply is consistent with site procedures and does not alter any existing Technical Specifications. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-124

Source Document: OM15A Emergency Plan for PNPP, Rev. 1C, TC-4

Description of Change

This evaluation analyzes changes made to Revision 10 of OM15A, Emergency Plan for PNPP. The changes are derived from comments made by the State of Ohio and local county Emergency Management Agencies as part of their annual review of the Perry Emergency Plan in accordance with Appendix E of 10 CFR 50.

Summary

- I. No. The proposed changes are administrative in nature. The effectiveness of the PNPP Emergency Plan has not been decreased per 10 CFR 50.54(q). They do not effect or direct the operation of plant systems, equipment, or components. The changes do not affect previously evaluated accidents. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. These changes are administrative in nature and do not effect or direct the operation, equipment or components. The change does not affect previously evaluated accidents. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-126

Source Document: DCP 91-107, Rev. 0

Description of Change

This design change relocates the Nuclear Closed Cooling (NCC-P43) System pressure gauges 1P43-R0527/R0532 to ensure the gauges read the proper pressure.

Summary

- I. No. This change only involves switching the physical locations of pressure indicators in the NCC process piping. This is necessary for the indicators to be able to read the proper pressure range. The installation of these indicators is exactly the same as the original installation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change is nonsafety-related and in no way interfaces with, nor is relied upon to perform a safety-related function. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The switching of the pressure indicators does not impact the bases of the Technical Specifications. The activity will enhance the performance of the NCC System, since the proper pressure ranges can be read with greater accuracy. Since these indicators do not perform a safety function, the margin of safety as defined in the bases for Technical Specifications will not be reduced.



SE No.: 91-127, 92-58

Source Document: DCP 90-071, Rev. 0

SCR 1-91-1313 through 1-91-1324

### Description of Change

This design change replaces the existing pneumatic level control system for the Low Pressure Feedwater Heaters 1N21-B001A/B/C and 1N21-B002A/B/C with an electronic single loop digital control system. The change also deletes the setpoints for 1N26-R044A/B/C, 1N26-R045A/B/C, 1N26R-104A/B/C, and 1N26-R105A/B/C.

### Summary

- I. No. The Low Pressure Feedwater Heater Level Control System is nonsafety and is not required for safe shutdown. The new system is powered by an uninterruptable power source coupled with a redundant 24-volt power supply to improve the control system's reliability. Upon loss of power, the heater drain valves will still fail to their design fail position. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The Low Pressure Feedwater Heater Level Control System is nonsafety-related and is not required for safe shutdown. Control system failure will result in the heater drain valves going to their design failure position. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This design change will have no impact on the Minimum Critical Power Ratio limits described in Technical Specification 3/4.2.2. Therefore, the margin of safety will not be reduced.

SE No.: 91-129

Source Document: DCP 90-158, Rev. 0

### Description of Change

This design change replaces the 4-inch carbon steel Reactor Water Clean-Up (RWCU-G33) System piping running between the Recirculation (B33) loops, within valves 1G33-F100, F102 and F106, with electropolished and preoxidized, SA-376 TP 347 modified stain. ss steel piping.

### Summary

- I. No. This design change is an ALARA consideration to reduce the excessive amount of radiation exposure received by the workers inside the Drywell area. The material was chosen because of its superior mechanical strength and welding characteristics. The material is recommended in NUREG-0313 as stainless steel resistant to Intergranular Stress Corrosion Cracking (IGSCC) in welds on BWR piping. The requirements of the ASME Boiler and Pressure Vessel Code, Section III, Class 1, the 1974 edition with addenda through Winter of 1975 govern the original and replacement designs. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change does not compromise the normal function of the RWCU system, as it maintains the original design requirements. The design, quality and qualification of this pipe replacement maintains or improves the integrity of the RWCU System compared to the design evaluated previously in the USAR. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. As stated above the piping replacement is manufactured and installed to the original ASME codes. The function and configuration of the G33 System does not change. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-132

Source Document: DCP 90-121, Rev. 0

### Description of Change

This design change installs seal water lines to the Amertap Recirculating (1N71-C0002) pump and Amertap Re-injection (1N72-C0003A/B) pumps.

### Summary

- I. No. This design change adds valves, piping, flow regulators and piping supports from the Two Bed Demineralization (P21) System to provide seal water to the mechanical seals of the above mentioned pumps. This will allow permanent uninterrupted seal water, thus increasing seal life. This modification does not alter the performance or function of the P21 or the Circulating Water (N71) Systems. The modification will meet materials and standards of the existing systems. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The line extension of the P21 System is less than one-inch in diameter and is outside the scope of moderate energy line breaks. This line will be an extension of the already installed piping and shutoff valve and therefore would not be an additional source of flooding. The change does not alter the performance or function of the P21 or N71 Systems. This modification does not create the possibility of an accident or malfunction of a different type than any evaluated previously in the USAR.
- III. No. The overall design of both systems remains consistent with that described in USAR Sections 1.4 and 9.2. The functions of the N71 and P21 Systems remain unchanged. Therefore, the margin of safety will not be reduced.

SE No.: 91-133

Source Document: DCP 89-257B, Rev. 0

### Description of Change

This design change installs heat trace cable protection and pipe insulation with aluminum lagging on the portion of Makeup Water Pretreatment (P20) System that supplies seal water for the Circulating Water (N71) pump bearings. This freeze protection is required to prevent loss of seal water to the N71 pumps as a result of cold weather.

### Summary

- I. No. This change will prevent freezing and the loss of seal water to the circulating water pumps. P20 and N71 are nonsafety and not required for safe shutdown. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. P20 and N71 are nonsafety-related systems and have no impact on other safety-related systems. They are not addressed in Technical Specifications. Therefore, the margin of safety will not be reduced.

SE No.: 91-135

Source Document: DCP 88-243, Rev. 0

### Description of Change

This design change evaluates the implementation of the Mechanical Stress Improvement Process (MSIP) to various reactor pressure vessel (RPV) nozzle to safe-end welds.

### Summary

- I. No. MSIP is a process which mitigates and prevents Intergranular Stress Corrosion Cracking (IGSCC) of susceptible materials within the reactor vessel to safe-end weld region. It accomplishes this by redistributing the residual stress field around the nozzle to safe-end weld such that the weld region is put into residual compression. IGSCC cannot occur in regions of residual compression. As stated in NUREG 0313, Rev. 2 and Generic Letter 88-01, MSIP has been recognized by the NRC as a method that has proved effective in minimizing the occurrence of IGSCC in BWR piping.

MSIP will be utilized on the RPV nozzle to safe-end connection of the Reactor Recirculation, Feedwater, Low Pressure Core Spray, High Pressure Core Spray, Residual Heat Removal, and Jet Pump Instrumentation Systems. The proposed MSIP activity does not change the design, material, or construction standards applicable to the above noted systems. The operability of the affected systems is not impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.

- II. No. The MSIP process is administratively controlled to ensure the proper deformation of the RPV nozzle to safe-end welds. Since the impact of the MSIP process is limited to the RPV nozzle to safe-end weld area, the malfunctions to be considered include changes in internal pipe diameter and possible thinning of the pipe wall as a result of the squeeze. Industry experience has shown that MSIP implementation results in insignificant changes in internal pipe diameter and wall thickness. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.

- III. No. This design change involves modifications in pipe wall stresses to improve resistance to IGSCC. There is no change to operation or function of any system. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-136

Source Document: OM16F Physical Security Plan, Rev. 16

Description of Change

This evaluation analyzes changes made to OM16F, Physical Security Plan. The changes have been evaluated to ensure that the effectiveness of the Perry Nuclear Power Plant Security Plan has not been reduced and to ensure that the requirements of 10 CFR 73, Physical Protection of Plants and Materials, are met. Site Protection must be contacted for further details since this is considered "SAFEGUARDS" information.

Summary

- I. No. OM16F describes the comprehensive Physical Security Program and therefore, does not affect the occurrence or consequences of an accident or malfunction of equipment.
- II. No. OM16F does not direct the operation of plant systems or equipment and, therefore, does not create the possibility for an accident or malfunction.
- III. No. OM16F does not reduce the margin of safety as defined in the bases for Technical Specifications.

SE No.: 91-138

Source Document: SSCR CR 91-091

### Description of Change

This change request evaluates editorial changes to the Safe Shutdown Capability Report which reflect existing circuit and component design, location, and operation as analyzed for safe shutdown.

### Summary

- I. No. These editorial changes and corrections do not impact the analysis of the separation and protection of redundant trains of safe shutdown equipment and circuits. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change request does not involve any physical changes to the plant. Hence, it cannot introduce new hazards. The required operating modes and functions of all systems involved in this change are not different than previously evaluated in the USAR. Therefore, no new accident or malfunction will be created.
- III. No. This change does not modify any previously evaluated methods of system operation or means of shutdown outside the Control Room. Therefore, no margin of safety is reduced.



SE No.: 91-139

Source Document: Generic Letter 81-38

### Description of Change

This evaluation analyzes the incorporation of on-site interim storage of low level radioactive waste outside the generating facilities at PNPP.

### Summary

- I. No. This design change provides for the installation of a concrete slab adjacent to Unit 1 Cooling Tower to provide a level surface for the storage of Onsite Storage Containers (OSSCs). A chain link fence is installed around the perimeter of the OSSCs area to control access. Transportation of and handling of liners and High Integrity Containers (HICs) into and out of OSSCs will be administratively controlled.

The possibility of physical damage to an OSSC resulting in the release of its stored contents to the environment was previously evaluated in DCP 86-891. In addition, the manufacturer of the OSSCs, Atcor Engineered Systems, has certified that these containers were designed to be in compliance with Generic Letter 81-38. Fire within the OSSC is precluded through design and administrative controls on the OSCC's use. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.

- II. No. An engineering evaluation of the design and construction of the OSSC and the potential for physical damage arising from a dropped liner shows that the resultant radiological consequences are well within NRC limits. This coupled with the information in Item I above, does not create the possibility of an accident or malfunction of a different type than any evaluated previously in the USAR.
- III. No. Technical Specifications do not address limits on the storage of radioactive waste, other than the requirements of 10 CFR 20, and 40 CFR 190. Administrative controls currently exist to assure that these limits will not be exceeded. Waste will be stored in appropriate containers so as not to increase site boundary dose rates by more than a small fraction of the plant operating limits. Therefore, no margin of safety will be reduced.

SE No.: 91-140, 91-141

Source Document: DCP 89-012, Rev. 0

### Description of Change

This design changes the Reactor Core Injection Cooling (RCIC-E51) System valve 1E51-F0046 from a Motor Operated Valve (MOV) to a Normally Open (NO) manually operated valve. (Electrical and Fire Protection Evaluation.)

### Summary

- I. No. This design change modifies the valve to a manually operated, NO valve. The number of active components for RCIC to operate is reduced by one. Cooling water to RCIC lube oil cooler will always be available when the RCIC pump runs because the valve will be NO. As this valve is not a containment isolation boundary or a reactor pressure boundary during normal operation it does not subject any more piping to reactor pressure and does not increase the chance of a LOCA. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Valve 1E51-F0046 will be locked open to prevent mispositioning and allow cooling water to the RCIC lube oil cooler during system operation. Overall, RCIC System operation will not be affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This design change has no effect on the function or operation of the RCIC System or its ability to perform its safety function. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-142

Source Document: DCP 89-146, Rev. 1

Description of Change

This design change revision corrects duplicated MPL numbers previously assigned to the Turbine Building Closed Cooling (TBCC-P44) System valves.

Summary

- I. No. This revision only alters MPL numbers. It does not alter the Turbine Building Closed Cooling (P44) System or Turbine Generator Hydrogen Cooler operation or reliability. The P44 System is not required for safe shutdown. The line extensions will be installed in accordance with approved codes and standards. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in USAR is not increased.
- II. No. The vent line extensions are less than one-inch in diameter and are outside of the scope of moderate energy line break analyses. P44 System and hydrogen cooler operation or function is not impacted. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The overall design of the P44 System remains unaffected. The function of hydrogen cooler waterbox vents remains unchanged. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-143, 92-034

Source Document: DCP 87-785 -/A/B, Rev. 0  
DCP 87-785, Rev. 1

### Description of Change

This design change enhances the overload and overcurrent protection relaying of the three divisional Standby Diesel Generators (DG) during non-LOCA operations.

### Summary

- I. No. This modification alters the non-LOCA overload and overcurrent relaying associated with the three divisional DGs. The new relaying does not impact the function or operation of the DGs. The function or operation of the DGs response to LOCA or station blackout have not been affected. The DGs will still be able to perform their accident mitigation functions. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety is not increased.
- II. No. This change will not prevent the DGs from performing their accident mitigation functions. The seismic or environmental qualifications of the DGs will not be affected. The fire protection associated with the DGs and the DG safe shutdown capability are not impacted. Hence, the possibility of creating an accident or malfunction of a different type than any evaluated previously does not exist.
- III. No. This change does not alter the function or operation of the three divisional DGs. Technical Specification 3/4.8 which refers to DG operability has not been impacted. Therefore, no margin of safety has been reduced.

SE No.: 91-146, 92-121

Source Document: S01-R43, Rev. 7, TC-2

### Description of Change

This evaluation analyzes changes to System Operating Instruction R43 which installs a temporary jumper between LOCA auxiliary relay contacts in the Standby Diesel Generator (DG) start circuit. This allows operation of the DG with the only LOCA trips being active.

### Summary

- I. No. This evaluation assumes the DGs will fail in a Station Black Out (SBO) and/or a Total Loss of AC Power (TLAC), both of which are not discussed in the USAR. In this scenario, the ability to remove heat from the containment is lost, the recovery of an DG by installation of a jumper that bypasses non-LOCA trips would allow heat removal from the containment thereby extending the time until a containment design parameter is reached. In an SBO and/or TLAC the installation of the jumper may help to mitigate an accident that is beyond design bases. Other than this activity there is no impact upon the DGs. The DGs design/function/operation have not been otherwise affected. The DGs will still continue to perform their accident mitigation functions. Therefore, probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR does not exist.
- II. No. Once the jumper is installed, the DG control system is electrically identical to what it would be when a LOCA signal is present. Other than this activity there is no impact upon the DGs. The DGs design/function/operation have not been otherwise affected. The DGs will still continue to perform their accident mitigation functions. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The DG is declared inoperable prior to jumper installation and is not declared operable until after the completion of an inspection following jumper removal. Upon declaring the DG inoperable, the actions for an inoperable Standby Diesel Generator are taken as required by Technical Specifications. The DGs design/function/operation have not been altered. The DGs will still continue to perform their accident, mitigation functions. Therefore, no margin of safety will be reduced.

SF No.: 91-148

Source Document: DCP 90-048, Rev. 0

Description of Change

This design change replaces the existing Reactor Plant Sampling (P35) System conductivity monitoring instrumentation with a Martek (Mark XX) conductivity analyzer.

Summary

- I. No. This modification replaces existing instrumentation with new instrumentation. P35 System analytical functions have not changed. This system is strictly a monitoring system and performs no plant control functions. The P35 System is not required for safe shutdown and it does not interface or affect any safety system. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change does not alter the function of the P35 System. P35 failure will not impact any safety-related or safe shutdown equipment. Reactor water conductivity will not be affected. Therefore, no margin of safety will be reduced.

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SE No.: 91-153

Source Document: MFI 1-91-065

Description of Change

This evaluation analyzes a Mechanical Foreign Item (MFI) which gags the Reactor Water Cleanup (RWCU-G33) Regenerative Heat Exchanger (tube side) relief valve 1G33-F504 to stop leakage that is causing significant Radon problems within the Containment Building.

Summary

- I. No. This MFI installs a "test rod" gag screw to fully close and seat 1G33-F504, thus disabling it. RWCU valve 1G33-F502 is a relief valve on the non-regenerative heat exchangers that will provide protection on the same section of G33 piping/tubing. There are no valves or other means of accidentally isolating this relief valve. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. As stated above the redundant relief valve 1G33-F502 provides adequate overpressure protection. Therefore, no margin of safety will be reduced.

SE No.: 91-154, 92-046, 92-060

Source Document: DCP 91-028, Rev. 0  
TXI-0140, Rev. 0  
TXI-0141, Rev. 0

#### Description of Change

This design change modifies the Control Room Ventilation (M25/26) System by: elimination of duplicative initiation signals, replacement of control relays, improvements in control logic, addition of run time meters, and new control setpoints.

#### Summary

- I. No. This design change will not increase the likelihood of equipment failure or the ability to maintain habitability of the Control Room. The M25/26 System can be manually or automatically started on emergency signals through a common control logic. The accident mitigation functions of the M25/26 System have not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. As stated above, these changes will not have an adverse affect on Control Room habitability. The accident mitigation functions of the M25/26 System have not been impacted. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The function of the M25/26 System has not been compromised by this design change. Technical Specification 3/4.7.2 has not been affected. Therefore, no margin of safety will be reduced.

SE No.: 91-156

Source Document: GMI-011, Rev. 1, TC-3

Description of Change

This evaluation analyzes a change to General Maintenance Instruction (GMI)-011, "Replacement of Atmosphere Clean-up System Charcoal Filters". The change allows the removal of spent carbon by vacuuming from the top of the charcoal bed instead of the bottom.

Summary

- I. No. This change merely provides for an alternate removal point within the bed. Personnel radiation exposure will be reduced due to the shorter time spent in charcoal removal. Charcoal removal is not considered in the accident analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The alternate removal point does not reduce the margin of safety.

SE No.: 91-158

Source Document: DCP 90-271, Rev. 1

### Description of Change

This design change modifies the Division 1 and 2 Diesel Generator (DG-R43) 1R43-K4 relay from being normally energized to normally de-energized. This relay is used to control the operating mode of the governor.

### Summary

- I. No. This design change will not change the standby power sources as previously described in the USAR Section 8.3.1.1.3, and Figures 8.3-6 and 8.3-9. The design, material and construction standards for Class 1E equipment and circuits are in accordance with the criteria for independence of Class 1E equipment and circuits. The DG's Isochronous or Droop modes of operation will still be met and the overall system performance will not be compromised. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The mode of operation desired during an auto start is unchanged. The new relays will be subjected to a potential of 125 Vdc, only during surveillance and emergency runs rather than being held in a continuously energized state which has been reported to be detrimental to long term relay operation. As a result of this change the K4 relay circuit is no longer subfused by a 6 ampere fuse but remains protected by the overall 30 ampere control circuit fuse. This is consistent with the overall control circuit protection philosophy used throughout the diesel generator controls and the entire Perry design. Reliability of the control circuit takes precedence over protecting any individual components. During a Loss Of Coolant Accident or a Loss Of Off-site Power K4 relay operation is not required. The DG controls will function as previously designed. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. As stated above, the reliability of the DG's control circuits were enhanced by the change of the state condition of the control relay when the engines are in standby readiness. Technical Specification 3/4.8, "Electrical Power System", has not been impacted. Hence, no margin of safety will be reduced.

SE No.: 91-159

Source Document: SCR 1-91-1363 through 1-91-1368  
TAF 81239

Description of Change

This evaluation analyzes setpoint changes which increase the Standby Diesel Generator (DG) fuel oil day tank levels and modifies the filling sequence of the tanks.

Summary

- I. No. These changes modify the above listed DG setpoints in a conservative direction. They have no affect on DG equipment reliability or function. These revised setpoints are within the adjustable range of the affected instruments. The accident mitigation functions of the DGs have not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. These changes do not adversely affect the reliability of the on-site power supply as defined in the bases of Technical Specification 3/4.8. Therefore, no margin of safety will be reduced.

SE No.: 91-161

Source Document: PAP-0514, Rev. 3

### Description of Change

This evaluation analyzes changes made to PAP-0514, "External Radiation Exposure Control," which incorporates the new emergency exposure guideline reduction from 100 rem to 75 rem for life-saving actions.

### Summary

- I. No. The 75 rem value for life-saving actions is endorsed by EPA-520, "Manual of Protective Actions for Nuclear Incidents." There are no new radiological release mechanisms, release rates or consequences associated with this change. Accident analysis will not be affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The proposed revision is more conservative than that assumed by the present safety margins. Therefore, no margin of safety will be reduced.

SE No.: 91-163

Source Document: PAP-1910, Rev. 3

### Description of Change

This evaluation analyzes several changes to PAP-1910, "Fire Protection Program." Changes were made to establish the specific guidelines and scope of the Perry Fire Protection Program procedure control to provide guidance as to who is responsible for specific portions of the program.

### Summary

- I. No. All changes made to this procedure were evaluated with respect to the USAR. All changes made were found to be consistent with the fire protection requirements of the USAR and of the NFPA guidelines. The changes have no effect on any system design or operation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR is not increased.
- II. No. All changes made to this procedure are consistent with the fire protection requirements of the USAR and of the NFPA guidelines. There is no impact upon any system design or operation. Therefore, the possibility of creating an accident or malfunction different from any previously evaluated in the USAR does not exist.
- III. No. The Fire Protection Program is referenced under administrative controls sections 6.5.1.6 N, 6.5.2.8 E, and 6.8.1 H of the Technical Specifications. All changes made in this procedure were found to be consistent with these Technical Specification sections, the USAR and the NFPA. Therefore, no margin of safety has been reduced.



SE No.: 91-166, 92-144

Source Document: DCP 91-155, Rev. 0

SCR 0-91-1071 through 0-91-1074

#### Description of Change

This change from an installed cement Solid Radioactive Waste (G51) System to a vendor operated dewatering/solidification system has reduced the normal operating pressure to a negligible level. Therefore, the low pressure trip has caused operational problems concerning the low pressure trip/alarm for the waste feed and waste dewatering pumps.

#### Summary

- I. No. As stated above G51 System was designed as in-house system. The high and low discharge pressure limits were to ensure feed and free flow from the waste feed pump to the waste mixing pump, which mixed cement with the waste from the waste feed pump. Since this is not required, normal discharge pressure is negligible and low pressure trip is not required for proper operation of the system. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The operation of the Solid Radwaste System is under the jurisdiction of the Process Control Program and is not defined in the bases of the Technical Specification. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 91-167

Source Document: DCP 89-010, Rev. 0

### Description of Change

This design change installs a loop seal in the overflow line of the Reactor Water Cleanup (RWCU-G36) Filter-Demineralizer Backwash Receiving Tank.

### Summary

- I. No. This change will have no affect upon the RWCU System's ability to maintain water quality. There will be no impact upon the RWCU System's ability to establish and maintain containment integrity. This change will have no affect upon the accidents/transients described in the USAR. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated is not increased.
- II. No. See Item I above.
- III. No. This change will have no effect on the ability of the RWCU System to maintain required water quality limits. Technical Specification bases have not be impacted. Therefore, no margin of safety will be reduced.

SE No.: 91-168

Source Document:

DCP 91-183, Rev. 0

SCR 1-91-1380 through 1-91-1387

Description of Change

This design change rescales the containment temperature monitoring recorders and indicators in the Control Room, changes out the temperature transmitter range calibration cards, and revises the instrument loop alarm setpoint leave-as-is-zone and reset values.

Summary

- I. No. This change does not affect any process parameter currently evaluated in the USAR analysis nor does it impact the functional requirements of instrumentation to perform safety-related trip functions. The 185°F temperature design basis of the containment is not impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of the equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change does not reduce the ability to determine average containment temperature via existing instrumentation. The 185°F design limit for containment temperature has not been affected. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-170

Source Document: TAF 81087, Rev. 0

### Description of Change

This evaluation analyzes the verification of Category A Computer Program, number E-C-0040, EXTRSP (S153), Revision 0. This program extracts a user specified set of response spectra from a verified database and provides as design input, an enveloping spectrum for calculations and USAR approved computer programs. Verification was accomplished by executing these runs and comparing the resulting enveloped spectra with hard calculations and plots.

### Summary

- I. No. This program was developed to utilize ASME Code Case N-411 Damping Criteria for response spectra analysis. The design of piping, supports and interfacing structures will continue to conform to all applicable codes and standards required by the USAR. The probability of failure of these components will not be changed by use of this program. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The bases for the margin of safety of the piping, supports and interfacing structures lies in conformance with USAR required codes and standards. The probability of component failure will not be changed by use of this program. Therefore, no margin of safety will be reduced.

SE No.: 91-174

Source Document: NR 91-S-097, Rev. 0

### Description of Change

This evaluation analyzes the justification for continued operation of the High Pressure Core Spray (HPCS-E22) Diesel Generator with a non-qualified relay; Cutler-Hammer E22-74A, CAT D26MR40A; in the Air Starting Compressor Circuitry.

### Summary

- I. No. The relay in question only provides a safety-related alarm indicating starting air pressure overload/loss of power. Its failure cannot inhibit the safety function of the air starting compressor. The mitigation function of the HPCS Diesel Generator will not be affected by use this non-qualified relay. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The use of a non-qualified relay in an alarm only circuit will not impact the safety function of the HPCS Diesel Generator. Radiological analyses described in USAR Chapter 12 are not affected. The reliability and redundancy of on-site power is not affected. Therefore, the possibility of creating an accident or malfunction of a different type than previously evaluated does not exist.
- III. No. Allowing continued use of the non-qualified Cutler Hammer relay will not reduce reliability of the air starting system and/or the ability of the HPCS Diesel Generator to respond to a LOOP or LOCA condition. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-175

Source Document: NR 91-S-099, Rev. 0

#### Description of Change

This evaluation analyzes the interim Use-As-Is disposition of Feedwater (N27) System pipe supports number 1N27-H0029 and 1N27-H0030 on ASME Class I piping inside drywell. Fillet weld between structural tube and plate may exceed pertinent ASME Section III stress allowables.

#### Summary

- I. No. In order to increase the probability of a feedwater line break, these pipe supports would have to be non-functional. The supports' weld capacity was analyzed using the procedures of "AISC Manual of Steel Construction - Load and Resistance Factor Design (LRFD)", First Edition. Under the condition of deadweight loading, the reduced welds have been shown to have factored loads which are significantly below the maximum load carrying capacity based on the LRFD method, indicating that the support will remain functional. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The evaluation has considered the effects of the reduced weld capacity. Since the subject weld is internal to the pipe support, the weld could only create the possibility of a malfunction or failure of the support. However, as stated above the supports will not fail. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. LRFD, shows that the support is still able to function and meet design intent under all loading conditions. Since the support can still function, it does not adversely impact the overall integrity of the feedwater piping. Therefore, the margin of safety will not be reduced.

SE No.: 91-181, 92-150

Source Document: CR 91-233

### Description of Change

This Condition Report evaluates the contamination of the Service Air (P51) System via the Condensate Filter (N23) System backwash. Safety Evaluation 92-150 is a revision to Safety Evaluation 91-181.

### Summary

- I. No. The isolation valve between the P51 and N23 Systems was either leaking or stuck open during a backwash of the N23 "B" filter. Water containing radioactive material from the filter media was forced into the P51 System. The extent of the contaminated water in the P51 System was small, being contained on the lower two levels of the Turbine Power Complex. The P51 was immediately blown down to the Liquid Radwaste System. There was no release of radioactive material outside the confines of plant piping, thus no potential monitored or unmonitored release occurred from this event. Operation of the P51 System with a small amount of water in the nonsafety piping does not impact the loss of service air event described in USAR Section 15.2.10. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The operation of P51 is not covered in Technical Specifications. There was no release of radioactive material to any unrestricted area. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.



SE No.: 91-182

Source Document: LL&JED 1-91-074

### Description of Change

This evaluation analyzes the installation of a jumper which allows the Main Heat Extraction and Miscellaneous Drain valve 1N22-F0010 to be closed when 1N11-F0110B is also closed. This will isolate Moisture Separator Reheater (MSR) 1N25-B0001B.

### Summary

- I. No. Valve 1N22-F0010 is a normally closed valve which fails open. The valve functions to drain the steamline during startup and shutdown operations. The valve is interlocked to open when either 1N11-F0110B or 1N11-F0115B closes. Valve 1N11-F0115B is open to permit steam to maintain the MSR hot and condensate free. 1N11-F0115B can be shut either by manual actions or by a high steam pressure exiting the low pressure turbine. Administrative controls are in place to ensure that 1N22-F0010 would be manually open should 1N11-F0115B be shut. No other changes are being made to the main steam or turbine control circuitry. No credit is taken for these drain valve operations in any accident scenario. Complete failure of the turbine is analyzed in the UAR and that analysis bounds any possible effect from this modification. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety is not increased.
- II. No. See Item I above.
- III. No. The control circuits which are being modified are not mentioned or implied in any Technical Specification bases. Therefore, no margin of safety will be reduced.

SE No.: 91-184

Source Document: PAP-1911, Rev. 4

#### Description of Change

This evaluation analyzes several changes made to PAP-1911 "Fire Emergency." Changes were made to update departmental organizations, clarify personnel response to potential fire emergencies in the plant, and expand on procedure definitions.

#### Summary

- I. No. All changes were administrative in nature. No systems, components, or structures were impacted. All changes made were found to be consistent with the fire protection requirements of the USAR. Therefore, the probability of an occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR was not increased.
- II. No. All changes made are consistent with the fire protection requirements of the USAR. There is no impact upon any plant system or component. Therefore, the possibility of creating an accident or malfunction different from any previously evaluated in the USAR does not exist.
- III. No. The Fire Protection Program is referenced under Administrative Controls Sections 6.5.1.6 N, 6.5.2.8 E, and 6.8.1 H of the Technical Specifications. All changes made in this procedure are consistent with these Technical Specification sections and the USAR. Therefore, no margin of safety has been reduced.

SE No.: 91-185

Source Document: LL&JED 1-91-075

### Description of Change

This evaluation analyzes the installation of electrical jumpers in the Solid Radioactive Waste Control Panel, 1H51-P092, to facilitate waste processing while panel repairs are in progress.

### Summary

- I. No. The Solid Radioactive Waste Control Panel loss of power problem does not allow the programmable controller to work. This controller enables a traveling belt conveyer permissive signal that allows normal operations of flat bed filters. Installation of this electrical device will facilitate the operation as described in the USAR. This device will not impact the solid or liquid radioactive waste accidents described in USAR Chapter 15. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The electrical device will not reduce the margin of safety as defined in the bases for Technical Specifications.

SE No.: 91-187

Source Document: DCP 90-099, Rev. 0  
DCP 90-099A, Rev. 1

### Description of Change

This design change removes piping support snubbers on the Reactor Recirculation (B33) System, as part of the Perry Snubber Optimization Program.

### Summary

- I. No. General Electric (GE) has performed a piping stress re-analysis using ASME Code Case N-411. Per this analysis GE has found all loadings and stresses are within ASME Code allowables for the B33 System. The piping system performance is not changed. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. All equipment interfacing with the piping system were reviewed to ensure compliance with their applicable design specifications. There are no changes to the configuration or function of the piping system nor any adverse effect on interfacing equipment. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The pipe stress analysis and pipe support design calculations meet the allowable stresses of the ASME Code. Interfacing equipment has similarly been checked to ensure compliance with pertinent ASME Code requirements as specified by applicable design specification. Also, the configuration and function of the piping has not been changed. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-188

Source Document: TAF 81284

Description of Change

This evaluation analyzes the Computer Program PC-CRACK Version 2.0 which will be used in component flaw analysis.

Summary

- I. No. The computer program provides the mathematical algorithms necessary for flaw evaluation. The program will be used during ASME Section XI evaluations. The program has been verified through testing. The ASME acceptance limits have not been altered. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The computer program shall be used to demonstrate compliance with the acceptance limits of the ASME Code. Since the ASME Code provides the appropriate acceptance limits and these limits are not being changed, there is no reduction in the margin of safety.

SE No.: 91-189, 92-173

Source Document: DCP 87-524A, Rev. 4 and Rev. 6  
DCP 87-524M, Rev. 3

#### Description of Change

This design change removes the temporary Zinc Injection (P85) Skid and installs a permanent Zinc Injection (P85) System. (Reference Safety Evaluation 87-504.)

#### Summary

- I. No. The zinc injection system utilizes feedwater to dissolve and transport zinc into the primary coolant for corrosion control. The P85 System is nonsafety and does not impact safe shutdown. Failure of the equipment does not impact accident analysis described in USAR Chapter 15. Releases postulated as a result of postulated failures of gaseous or liquid waste treatment systems are well within the guidelines established in 10 CFR 20 and 10 CFR 100. The equipment is built and installed in accordance with industry standards. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The P85 System is used for primary coolant corrosion control. The P85 System is nonsafety-related and does not effect systems important to safety. Use of the system does not contribute to offsite exposures as defined in 10 CFR 100. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The P85 System will not affect the reactor water chemistry limits defined in Technical Specifications. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-190, 92-160

Source Document: LL&JED 1-91-076

Description of Change

This evaluation analyses the installation of an electrical device which will prevent the Turbine Building Ventilation (M35) System heating supply coil for M35-C001C fan from freezing.

Summary

- I. No. The low temperature trip of M35-C001C is inoperative due to a bad freeze-stat. At present M35-C001A & B are out-of-service due to coil leaks. Defeating the low temperature trip is required to ensure the M35-C001C supply fan is available to circulate hot air through the coils to prevent freezing. This action will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR.
- II. No. See Item I above.
- III. No. Turbine Building Ventilation is a nonsafety-related system and not covered by Technical Specifications. Therefore, no margin of safety will be reduced.



SE No.: 91-191

Source Document: DCP 90-049, Rev. 0

### Description of Change

This design change installs a pressure regulating valve in the Two Bed Demineralization (P21) System piping that supplies seal water to the Sodium Hypochlorite (P84) System Transfer pumps, 1P84-C005 and OP84-C006A & B.

### Summary

- I. No. The P21 and P84 Systems are nonsafety and are not required for safe shutdown. The pressure regulator is installed to the original design, material, and construction standards. Failure of these two systems do not affect USAR accident analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The pressure regulator will reduce pump seal water failures. Failure of this valve or of the P21 and P84 Systems will not affect USAR accident analysis. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The P21 and P84 systems are not addressed by Technical Specifications. In addition the Technical Specification licensing bases parameters are not affected by the addition of the pressure regulator. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-192

Source Document: SOI-G33, Rev. 7

#### Description of Change

This evaluation analyzes changes to System Operating Instruction G33 which will permit operation of the Reactor Water Clean-Up (RWCU-G33) System with the only suction path being the one from the reactor vessel bottom head. Single suction path operation will be restricted to Operational Conditions 4 and 5.

#### Summary

- I. No. Reactor water chemistry during single path operation will continue to meet the Technical Specification limits. RWCU piping failure analyses will not be affected. The safety design aspect of the RWCU System is the isolation function. This function will not be impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change does not effect the operation of the RWCU isolation logic or isolation valves. Water chemistry will still satisfy the Technical Specification requirements. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. RWCU System operation is not described in the bases for any Technical Specification and the isolation logic and isolation valves remain unchanged. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

FE No.: 91-193

Source Document: NR 92-S-002, Rev. 0

### Description of Change

This evaluation analyzes the interim Use-As-Is disposition of Feedwater (N27) System pipe support mark number 1N27-H0010, located on ASME Class I piping inside drywell. Fillet weld between structural tube and plate may exceed pertinent ASME Section III stress allowables.

### Summary

- I. No. In order to increase the probability of a feedwater line break, this pipe support would have to be non-functional. The support's weld capacity was analyzed using the procedures of "AISC Manual of Steel Construction - Load and Resistance Factor Design (LRFD)", First Edition. Under the condition of deadweight loading, the reduced welds have been shown to have factored loads which are significantly below the maximum load carrying capacity based on the LRFD method, indicating that the support will remain functional. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The evaluation has considered the effects of the reduced weld capacity. Since the subject weld is internal to the pipe support, the weld could only create the possibility of a malfunction or failure of the support. However, as stated above the support will not fail. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. LRFD, shows that the support is still able to function and meet design intent under all loading conditions. Since the support can still function, it does not adversely impact the overall integrity of the feedwater piping. Therefore, the margin of safety will not be reduced.

SE No.: 92-001

Source Document: DCP 90-097, Rev. 0

### Description of Change

This design change removes the piping support snubber on the Feedwater (N27) System piping, as part of the Perry Snubber Optimization Program.

### Summary

- I. No. General Electric (GE) has performed a piping stress re-analysis using ASME Code Case N-411. Per this analysis GE has found all loadings and stresses are within ASME Code allowables for the N27 System. The piping system performance is not changed. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. All equipment interfacing with the piping system were reviewed to ensure compliance with their applicable design specifications. There are no changes to the configuration or function of the piping system nor any adverse effect on interfacing equipment. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The pipe stress analysis and pipe support design calculations meet the allowable stresses of the ASME Code. Interfacing equipment has similarly been checked to ensure compliance with pertinent ASME Code requirements as specified by applicable design specification. Also, the configuration and function of the piping has not been changed. Therefore, the margin of safety as defined in the based for Technical Specifications will not be reduced.

SE No.: 92-002

Source Document: DCP-099B, Rev. 0

### Description of Change

This design change removes the piping support snubber on the Reactor Water Clean-Up (G33) System piping, as part of the Perry Snubber Optimization Program.

### Summary

- I. No. General Electric (GE) has performed a piping stress re-analysis using ASME Code Case N-411. Per this analysis GE has found all loadings and stresses are within ASME Code allowables for the G33 System. The piping system performance is not changed. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. All equipment interfacing with the piping system were reviewed to ensure compliance with their applicable design specifications. There are no changes to the configuration or function of the piping system nor any adverse effect on interfacing equipment. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The pipe stress analysis and pipe support design calculations meet the allowable stresses of the ASME Code. Interfacing equipment has similarly been checked to ensure compliance with pertinent ASME Code requirements as specified by applicable design specification. Also, the configuration and function of the piping has not been changed. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-003

Source Document: DCP 90-012, Rev. 0

### Description of Change

This design change modifies the Control Complex Chill Water (CCCW-P47) System and the Emergency Closed Cooling (ECC-P42) System to enable the CCCW Chiller OP47-B001C to be the primary operating chiller and the remaining (A or B) chillers to in stand-by.

### Summary

- I. No. This change will increase the reliability of the P47 System by increasing the availability of the A or B chillers which are backed by a Standby Diesel Generator. All components installed by this change are safety-related and satisfy the appropriate equipment qualification requirements. The function or operation of the P47 and P42 Systems will not be adversely affected by this modification. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. As stated above the design intent and function of the P47 and P42 Systems will not be affected. This design change introduces no new failure modes. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The function of the P47 and P42 Systems will not be altered. The Standby Diesel Generators nor the ratings of the appropriate motor control centers will not be adversely affected. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-004

Source Document: NR 91-N-111, Rev. 0

#### Description of Change

This evaluation analyzes the interim Use-As-Is disposition of the Circulating Water (N71) System blowdown line until rework can be done to replace the leaking 16-inch x 24-inch reducer.

#### Summary

- I. No. The operation of N71 System is unaffected by this disposition. N71 System failure will not adversely affect any safety-related equipment nor will it impact plant safe shutdown capability. A complete open ended break at the reducer will result in flooding of less than 15,000 gpm based on the flow coefficient of the upstream flow control valve. The postulated yard flooding resulting from this failure could be handled by the Underdrain System. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The N71 system provides no safety function. System failure could not impact safety-related equipment nor will it impact plant safe shutdown capability. The postulated break and resultant flooding is handled by the Underdrain System. Blowdown isolation and N71 shutdown (if necessary) would be in accordance with plant procedures and would have no impact on any Technical Specification. Therefore, the margin of safety will not be reduced.



SE No.: 92-005

Source Document: PAP-0501, Rev. 7  
PAP-0502, Rev. 8  
PAP-0507, Rev. 9

### Description of Change

This evaluation analyzes various changes made to PAP-0501, "PNPP Operations Manual;" PAP-0502, "Preparation, Review, and Approval of Procedures;" and PAP-0507, "Preparation, Review, and Approval of Instructions." The changes only impact the administrative process used to prepare, review, and approve the Operations Manual documents.

### Summary

- I. No. This change is editorial. The procedures do not change the content or interpretation of established commitments. All administrative controls will be maintained. There is no impact upon the plant or accident analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change is administrative in nature. It does not affect equipment important to safety. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change is editorial. No administrative controls specified in Technical Specifications are affected. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-006

Source Document: OM16F Physical Security Plan, Rev. 16, TC-1

Description of Change

This evaluation analyzes changes made to Revision 16 of OM16F, Physical Security Plan. The changes have been evaluated to ensure that the effectiveness of the Perry Nuclear Power Plant Security Plan has not been reduced and to ensure that the requirements of 10 CFR 73, Physical Protection of Plants and Materials, are met. Site Protection must be contacted for further details since this is considered "SAFEGUARDS" information.

Summary

- I. No. OM16F describes the comprehensive Physical Security Program and therefore, does not affect the occurrence or consequences of an accident or malfunction of equipment.
- II. No. OM16F does not direct the operation of plant systems or equipment and, therefore, does not create the possibility for an accident or malfunction.
- III. No. OM16F does not reduce the margin of safety as defined in the bases for Technical Specifications.

SE No.: 92-007

Source Document: DCN 3726, Rev. 0

### Description of Change

This evaluation analyzes an modification to P&ID 912-614, Turbine Building Ventilation (M35) System, which will allow the system's supply roughing filters to be removed during cold weather operation to preclude snow build up.

### Summary

- I. No. This snow build up is due to blowing snow at the outside air intake being drawn into the supply plenum. The M35 fan flowrates will remain within design margins. The M35 System is not required to mitigate the effects of an accident. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The removal of the supply roughing filters will not alter the design function of the M35 System. Further, filter removal will not affect the environmental conditions in the areas served by the M35 System. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. As stated above the M35 System will continue to function within design margins. Airflow will remain within design margins. Air pressures and airflow directions in areas served by M35 will not change. Releases of gaseous effluents and the ability to monitor them is unaffected. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-011

Source Document: DCN 3700, Rev. 0

Description of Change

This evaluation analyzes editorial changes made to various P&IDs for the Steam Bypass and Pressure Control (C85) System.

Summary

- I. No. This drawing change makes various editorial changes to the C85 System drawings. The changes will not impact the C85 System's design, function or operability. The feedwater controller failure analysis contained in USAR Chapter 15 is not affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. These changes are editorial in nature and do not affect Technical Specifications. Therefore, no margin of safety will be reduced.

SE No.: 92-014

Source Document: SOI-D17A, Rev. 2, TC-8

### Description of Change

This evaluation analyzes changes made to System Operating Instruction D17A which enables the Control Room operators to bypass and restore Channels A and C of the Main Steam Line Radiation Monitors (MSLRM). This will minimize the impact on the Control Room operations when returning Feedwater Heaters 6A and B, 5A and B, or Reactor Feedwater Booster Pumps to service while at power.

### Summary

- I. No. This change is necessary to prevent a scram and MSIV isolation due to Argon introduced due to incomplete venting of Feedwater System components. MSLRM channels B and D remain operable while A and C are bypassed to provide an automatic closure signal after detection of high radiation in the main steam lines. The Control Rod Drop Accident (CRDA) which references the use of MSLRM will not be affected. The Rod Pattern Control System (RPCS) mitigates the affects of this accident. This instruction change directs that the RPCS remain operable thus ensuring there is no impact to the consequences of the CRDA. Therefore, the probability of occurrence or the consequences of an accident or the malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. While MSLRM Channels A and C are bypassed, the Rod Pattern Control System (RPCS) and MSLRM Channels B and D remain operable. As stated above, the CRDA is not affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This procedure directs the bypassed MSLRM be declared inoperable and the action requirements for Technical Specifications 3/4.3.1 and 3/4.3.2 be met. With the RPCS and the other two MSLRM channels operable there is no impact upon CRDA. Therefore, no margin of safety will be reduced.

SE No.: 92-015

Source Document: TAF 81226  
USAR CR 92-009

### Description of Change

This evaluation analyzes the construction of a fuel depot located within the protected area at PNPP.

### Summary

- I. No. The fuel depot consists of two 300 gallon gasoline storage tanks located above ground. The refueling process consist of a 2200 gallon capacity tanker truck driving on site to the fuel depot approximately every two weeks. The evaluation (Calc. 5.5.8) concluded that the accidental explosion of the fuel depot or the refueling tanker truck does not effect plant operation and is in accordance with Regulatory Guide 1.91. Therefore, the probability of occurrence or the consequences of the accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The peak positive incident over-pressure due to the fuel depot explosion is below the 1.0 psi limit of Regulatory Guide 1.91 considered necessary to prevent damage to vital plant building. The fuel depot has been located far enough away from Unit 1 plant buildings such that it will not exceed the 1.0 psi limit in the event it were to explode. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. As stated above the probability of exceeding 1.0 psi limit for explosion has been determined to be below that identified by the NRC to be considered a credible event. Therefore, no margin of safety will be reduced.

SE No.: 92-017

Source Document: PAP-1913, Rev. 4

#### Description of Change

This evaluation analyzes changes made to PAP-1913, "Control of Transient Combustibles." The changes are administrative in nature and include such items as the details associated with Transient Combustible Permit requirements.

#### Summary

- I. No. This change is administrative in nature. The changes were found to be consistent with the NFPA guidelines and the Fire Protection requirements with respect to the USAR and its sub-tier documents. The changes do not alter any system or component. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The changes described above are administrative in nature. Plant system design or operability have not been impacted. The changes are consistent with NRC and NFPA guidelines. Therefore, the possibility of creating an accident or malfunction of a type different than previously evaluated does not exist.
- III. No. This change is administrative in nature. It does not impact any activity described in Technical Specifications. Therefore, no margin of safety will be reduced.



SE No.: 92-019

Source Document: PSTG, Rev. 1, TC-3

### Description of Change

This evaluation analyzes a change to the Perry Specific Technical Guidelines (PSTG) which allows operators to continue to use the containment spray lines to vent containment in preference over using the lines solely for the spray function.

### Summary

- I. No. The Emergency Procedure Guidelines (EPG) which are reviewed and approved by the NRC provides operators with the actions necessary to maintain containment integrity. The containment vent paths take advantage of various aspects of plant/system design to minimize the radiological effects of venting. Additionally, these vents paths are monitored. The design and operation of the systems involved are not altered. Accident analysis is not adversely impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. The systems required for venting are operated in a manner consistent with their design and function. Their use in venting has been approved by the NRC through the NRC's approval of the EPG's. Therefore, the possibility of creating an accident or malfunction of equipment of a different type does not exist.
- III. No. The systems required for venting and the venting activities have been reviewed and approved by the NRC. Therefore, no safety margin will be reduced.

Description of Change

This evaluation analyzes the interim Use-As-Is disposition of the Control Complex Chill Water (P47) System's nonsafety-related one-inch O.D. copper tubing. The tubing transports oil to various areas of the P47 compressor motor.

Summary

- I. No. The copper tubing thickness is within 0.002 inches of the minimum required wall thickness for ASTM B75 copper alloy 122. However, the tubing has sufficient structural integrity to maintain design pressure. The Use-As-Is disposition will not affect the function, operation, or design intent of the P47 System. Neither the P47 System or the systems it services impact the accident analysis described in USAR Chapter 15. There is certainty that the copper tubing will not rupture during a design basis seismic event. Therefore, the probability of occurrence or the consequences of an accident or malfunction or equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The one-inch O.D. copper tubing will not rupture due to being subjected to maximum pressure. The inherent flexibility of the copper tubing in conjunction with the existing wall thickness provides certainty that a design basis seismic event will not result in catastrophic tube failure. The design intent, function and operation of the P47 System and the systems it interfaces is not affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The function, operation, and design intent of the P47 System, and the systems it interfaces with will not be affected by the use of nonsafety-related one-inch O.D. copper tubing. Thus, the cooling coils interconnected to the P47 System will continue to supply design air temperature to the safety-related equipment. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-021

Source Document: OM15A Emergency Plan for PNPP, Rev. 10, TC-5

Description of Change

This evaluation analyzes changes made to Revision 10 of OM15A, Emergency Plan for PNPP. The changes are derived from comments made by the State of Ohio and local county Emergency Management Agencies as part of their annual review of the Perry Emergency Plan and Emergency Action Levels (EAL) in accordance with Appendix E (IV.B) of 10CFR50.

Summary

- I. No. The proposed changes are administrative in nature. The effectiveness of the Perry Emergency Plan has not been decreased per 10CFR50.54(q). The changes do not affect or direct the operation of plant systems, equipment, or components. The changes do not affect previously evaluated accidents. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. These changes are administrative in nature and do not effect or direct the operation, equipment or components. The change does not affect previously evaluated accidents. Therefore, no margin of safety will be reduced.

SE No.: 92-023

Source Document: IOI-9, Rev. 4

### Description of Change

This evaluation analyzes changes made to IOI-9, "Refueling". The changes permit the use of temporary Condensate (N21) System level indication during refueling outages.

### Summary

- I. No. During refueling outages, the condenser level is expected to be taken significantly higher than normal, and well above the range of the permanently installed indicators. This instruction directs operators to install temporary level indication in the form of a one-half inch tygon tube connected to the intermediate pressure condenser level low side vent, 1N21-F738, which runs up along the south side of the condenser wall. All components involved in performing this activity are located in the Turbine Building. This activity does not impact any accident evaluated in the USAR, and is bounded by the Circulating Water System break analysis (flooding) contained in the USAR. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This addition is not applicable to any Technical Specification nor does it effect any component that is covered by the Technical Specifications. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-024

Source Document: DCP 91-199, Rev. 0

### Description of Change

This design change replaces a one-inch drain line for the Containment Vessel Cooling (M11) System's Air Handling Unit M11-B0001F with tygon tubing.

### Summary

- I. No. The current one-inch drain line configuration is not satisfactory. The drip pan clogs and overflows onto surrounding equipment. Using tygon tubing directed to a nearby 3-inch equipment drain to drain the drip pan will solve this problem. Failure of this configuration will not impact any accident/transient evaluated in the USAR. The fire hazard associated with the use of tygon tubing has been evaluated to be insignificant to the fire loading of this location. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The quantity and source of liquid entering the drip pan has not changed. Failure of this configuration will not impact any accident/transient evaluated in the USAR. The fire hazard associated with the use of tygon tubing has been evaluated to be insignificant to the fire loading of this location. The re-routing of the drip pan for 1M11-B0001F to an existing 3-inch equipment drain line closer to the air handling unit cannot create a different type of accident or malfunction of equipment important to safety than any previously evaluated in the USAR.
- III. No. There are no operating parameters changed as a result of this modification. The re-routing of the drip pan drain does not alter the function/performance of the M11 System. Therefore, no margin of safety will be reduced.

SE No.: 92-026

Source Document: FCR 16039

#### Description of Change

This evaluation analyzes the temporary installation of a freeze plug in the Turbine Building Closed Cooling (P44) System to perform maintenance while the system is in operation.

#### Summary

- I. No. The installation of the freeze plug will permit inspection and repair of 1P44-N0557A. The P44 System is not required for safe shutdown. Freeze plug failure will not create a flooding hazard since flow can be isolated by manual isolation valves. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The P44 System is nonsafety-related and is not required for the safe shutdown of the reactor. Should the freeze plug fail the leakage can be isolated. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The freeze plug operation and its postulated failure does not affect any safety-related system. Therefore, no margin of safety will be reduced.

SE No.: 92-029

Source Document: MFI 1-92-009

### Description of Change

This evaluation analyzes a Mechanical Foreign Item (MFI) which will provide a temporary air supply to the lower containment airlock doors during performance of a design modification. (Reference DCP 90-153.)

### Summary

- I. No. The temporary air source will be utilized only in the event that seal pressure drops below 90 psig as indicated by the seal inflation safe/unsafe lights. This will ensure the airlock remains operable should the check valves leak during performance of the design modification. A plant operator will be stationed at the temporary air source in the event that temporary air becomes necessary. If this line breaks, air system integrity would be lost. This event would be bounded by the loss of instrument air event described in USAR Section 15.2.10. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. As stated above, compensatory actions exist to minimize the potential of a loss of instrument air event while utilizing the proposed MFI. If this line breaks, air system integrity would be lost. However, this would be bound by the analysis contained in USAR Section 15.2.10. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The purpose of this MFI is to ensure the airlock remains operable while performing design work as stated above. Because of the precautions taken and the fact that a loss of air has been evaluated, no margin of safety will be reduced.



SE No.: 92-030

Source Document: NR 90-S-060, Rev. 2

### Description of Change

This evaluation analyzes plant operation with containment airlock inflatable seal pressure at 95 psig rather than 90 psig as identified in the W.J. Woolley Qualification Report QR-1066/1081-1, Revision 1. (Reference Safety Evaluations 90-088 and 91-091.)

### Summary

- I. No. This change has no impact on the seal design bases with respect to ASME Code applications. The safety function to isolate the containment atmosphere from the environment under all plant design conditions remains unchanged. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. Constant monitoring of the between seal leakage, with alarms in the Control Room, provide assurance of seal integrity. Leakage limits and inflation source are not changed by the proposed activity. Previous testing provides evidence of ample margin with regard to inflation pressure and cycle life. Therefore, the margin of safety will not be reduced.

SE No.: 92-031

Source Document: DCN 3662, Rev. 0

### Description of Change

This evaluation analyzes a revision to P&ID 302-964, Leak Detection (E31) System to reflect the deletion of isolation valves referenced in "valves closed" portion of Table III, for temperature switches 1E31-N351A through -N351D.

### Summary

- I. No. This change is editorial and does not modify the E31 System performance or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is editorial in nature. No E31 System component or function has been altered. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 92-032

Source Document: TXI-0134, Rev. 0

### Description of Change

This evaluation analyzes a temporary instruction which describes the methodology for the chemical decontamination of Reactor Water Clean-Up (RWCU-G33) System piping.

### Summary

- I. No. The decontamination activities will utilize existing design aspects of the Reactor Recirculation (B33) System and of the G33 System. The decontamination equipment is constructed of stainless steel and satisfies the applicable ASME and ANSI codes. Spills of the decontamination chemicals will be collected/controlled by existing plant design features. The chemicals are non-volatile so there will be no impact upon any ESF ventilation system. The decontamination equipment failure with resultant loss of primary coolant is bounded by existing USAR analyses. The chemicals have been evaluated as safe for BWR use (EPRI Report TR-100049). Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. The decontamination equipment is installed in such a place that a seismic event would pose no hazard to other plant systems or components. Decontamination equipment failure is bounded by existing USAR analyses. The chemicals will not adversely affect plant systems or components. Therefore, the possibility of creating an accident or malfunction of a different type does not exist.
- III. No. The decontamination activities do not affect any equipment required by the Technical Specifications during the period the decontamination is in progress. As stated above, there is no impact upon the plant. Therefore, no margin of safety will be reduced.

SE No.: 92-033

Source Document: DCP 91-102, Rev. 0

### Description of Change

This design change provides a one-hour rated fire wrap throughout Fire Area Control Complex CC-6. This will ensure that the Method A Control Room (M25/26) Ventilation train is available in the event of a fire near conduit 1R33-C5461X or near any Method B circuits within the fire area.

### Summary

- I. No. This design change involves providing additional protection to the M25/26 System and does not introduce any new fire hazards or add combustibles to any plant area. M25/26 System function will not be impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. M25/26 operation is addressed in existing operation instructions. There are no special operator actions or post fire repairs required to achieve shutdown due to damage to the M25/26 System incurred by a potential fire in these areas. No non fire hazards or new combustibles have been introduced. Fire suppression system have not been affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change does not modify any previously evaluated methods of the M25/26 System operation or means of plant shutdown outside of the Control Room. There is no relationship between the change and the bases for any Technical Specifications concerning the Fire Protection Program. Therefore, no margin of safety will be reduced.

SE No.: 92-035

Source Document: ONI-R10, Rev. 2

### Description of Change

This evaluation analyzes changes to Off-Normal Instruction R10. The changes deleted the requirement to manually prelubricate the turbochargers of the Division 1 & 2 Diesel Generators as required by the Diesel Reliability and Quality Review (DR/QR) Program, DR/QR MP-022/023.

### Summary

- I. No. The requirement to prelubricate the diesels for all manual starts assumes electrical power is available to supply the lube oil pumps used for prelubrication. During a loss of AC power, this is not the case. The diesels are analyzed for 40 non-prelubed starts before a tear down inspection of the turbocharger is required. Thus, the diesels are capable of being safely started without prelubricating the turbocharger bearings. The manual non-prelubed start sequence is identical to the automatic start since the automatic start is non-prelubed. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Prelubricating the diesels is a requirement for all manual starts. Although the start directed in this instruction is a manual start, it is assumed that an automatic start has been received but failed to start the diesel. Additionally, due to the loss of electrical power during this event, prelubrication of the diesel turbocharger is impossible. Once action has been taken to correct the problem(s) that prevented the automatic start sequence from being successfully completed, the diesel manual start is attempted. Since the diesel start, in this instance, is identical to a normal automatic diesel start sequence, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Prelubrication of the diesels does not effect operability of the diesels for fewer than 40 non-prelubricated starts. Omitting this requirement, then, does not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-036

Source Document: DCN 3747, Rev. 0

Description of Change

This evaluation analyzes various editorial revisions to P&ID 808-302, Reactor Protection (C71) System, which reflect spelling and cross referencing errors.

Summary

- I. No. This drawing change is editorial and does not modify C71 System performance or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is editorial in nature. No C71 System component or function has been altered. Therefore, no margin of safety will be reduced.

SE No.: 92-037

Source Document: DCN 3730, Rev. 0

Description of Change

This evaluation analyzes an editorial change to P&ID 808-304-1, Feedwater (N27) Flow Control Logic, which removes a valve position limit switch from a control circuit.

Summary

- I. No. This change does not modify the N27 System performance or function. The drawing will depict the existing plant configuration. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The drawing change is editorial in nature. No system or component function has been altered. Therefore, no margin of safety will be reduced.



SE No.: 92-038

Source Document: USAR CR 92-021

### Description of Change

This evaluation analyzes the incorporation of a commitment in the USAR to IEEE 450-1980 and Regulatory Guide 1.129, with regard to accelerated testing of batteries showing degradation. The USAR will be made consistent with present surveillance test requirements defined in Technical Specification 4.8.2.1 paragraph F.

### Summary

- I. No. This change addresses the exceptions taken to the requirements of IEEE 450-1980 and Regulatory Guide 1.129 with regard to battery testing. The use of an eighteen month frequency, for accelerated testing, rather than the recommended twelve month frequency is acceptable based on the redundancy in our DC system design and the conservatism built into our surveillance and maintenance program.  
  
The reduced frequency of testing will not result in failure to detect a degraded battery condition. A total loss of DC power to a 1E safety division is unlikely based on the redundancy built into the system in that the Unit 1 and 2 divisional batteries can be used interchangeably. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The postulated loss of a safety-related division will not effect safe shutdown since either Division 1 or 2 can achieve safe shutdown. The reliability of the DC systems and the performance of other systems necessary for the safe operation and shutdown of the plant are not effected by this change. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. To be consistent with the Technical Specification, an exception shall be taken to the accelerated testing recommendations of IEEE 450-1980. The eighteen month frequency was previously determined to be adequate, but exception was never identified in the Technical Specification bases. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-039

Source Document: NR 92-S-015, Rev. 0

### Description of Change

This evaluation analyzes the justification for Use-As-Is disposition of instrumentation tubing for the High Pressure Core Spray Diesel Generator (HPCS-DG) without a detailed seismic qualification analysis of the instrumentation tubing.

### Summary

- I. No. Perry's HPCS-DG has been in service for 5 years and has been subjected to over 200 transients. Over the operating history of the HPCS-DG, there is no evidence of in elastic yielding of instrumentation tubing caused by transient or operational loads. DG failure will not affect the accidents evaluated in USAR Chapter 15. Therefore, the reliability of the instrumentation tubing is not compromised by this Use-As-Is disposition. Hence, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This non-conformance disposition is limited to the HPCS-DG instrumentation tubing, and will have no impact on the performance or function of the engine. The accident mitigation function of the DG has not been affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The margin of safety as defined in the bases to Technical Specification Section 3/4-8 refers to the reliability of the onsite power supply. Based on the fact that this disposition does not adversely affect the reliability of the onsite power supply, it therefore does not reduce the margin of safety of the Technical Specifications.

SE No.: 92-040

Source Document: DCP 92-009, Rev. 0

### Description of Change

This design change replaces five Emergency Service Water (P45) safety relief valves to different types without a back pressure.

### Summary

- I. No. The existing relief valves are piped to floor drains which are open to atmospheric pressure. The result is that there is no back pressure on the valves causing them to lift slightly when the ESW System is started up. This change will provide added reliability to the ESW System by eliminating premature opening. The ESW System and the safety-related equipment it supplies cooling water to is not functionally changed by this modification. Failure of these valves will not affect accident analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change does not change the functionability or operating characteristics of the ESW System. The new relief valves provide the intended pressure relief protection to the ESW lines and components as required by the ASME Code. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The use of the new relief valves does not alter the operation or function of the ESW System. System overpressure protection still exists and is in compliance with the ASME Code. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-041

Source Document: Delaval Vendor Manual Revision Notice, MRN 7

Description of Change

This evaluation analyzes revisions made to the maintenance schedule recommendations generated by the TDI Diesel Generator Owners Group Design Review and Quality Revalidation (DR/QR) Report.

Summary

- I. No. These changes are limited to maintenance practices on the standby diesel generators. Overall, the changes will not adversely impact the reliability, redundancy, or function of the diesel generators. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR has not increased.
- II. No. These changes do not impact the reliability, redundancy, or function of the standby diesel generators or the onsite power supplies. No new design has been introduced nor has any safety factor been reduced. Therefore, the possibility for creating an accident or malfunction of a different type than any evaluated previously does not exist.
- III. No. The reliability of the onsite power supply has not being changed. Therefore, margin of safety as described in the bases of the Technical Specification 3/4-8 has not changed.

SE No.: 92-042, 92-092

Source Document: DCP 92-027, Rev. 0  
S01-P87, Rev. 4

### Description of Change

This design change removes the obsolete in-line Hydrogen Analyzer from the Post Accident Sampling (PASS-P87) System grab sample panel. In lieu of this, Perry has elected to measure reactor coolant total dissolved gas which is an acceptable option per Regulatory Guide 1.97 and NUREG 0737.

### Summary

- I. No. This design change connects existing pressure and temperature instrumentation to the expansion volume vessel. Knowing the volume of the expansion vessel, the total gas concentration of reactor coolant can be determined. The bases for measurement is utilization of the Ideal Gas Law. This method satisfies the licensing requirement by measuring reactor coolant total dissolved gas. This option is acceptable since either analysis method is acceptable. The design intent of the P87 System has not been affected. Accident analysis has not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The modified components do not change the design function of the P87 System. The modifications are internal to the panel and they do not affect or change the plant as described in licensing bases document. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This modification provides an alternate means of measuring reactor coolant dissolved gas in order to maintain conformance with the Technical Specifications. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-043

Source Document: PAP-0101, Rev. 5

Description of Change

This evaluation analyzes changes to PAP-0101, "Perry Organization". The Procurement Department at the corporate level has reorganized and subsequently the name of the Field Purchasing Section was changed to the Nuclear Purchasing Section.

Summary

- I. No. This is an administrative change only and does not affect the safe operation of the plant. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is administrative only. The plant continues to be in full compliance of the Technical Specifications. Therefore, no margin of safety will be reduced.

SE No.: 92-044

Source Document: DCP 88-272, Rev. 0  
SCN 00339-DSP-P45-2

### Description of Change

This design change added flow indication to the Emergency Service Water (ESW-P45) System for the Emergency Closed Cooling (ECC-P42) Heat Exchangers during winter mode of operation. Therefore, the ESW System will have the capability to switch from summer to winter mode and retain accuracy in its flow measurement.

### Summary

- I. No. This change involves systems and components located in the Control Complex which are used for mitigating the severity of postulated accidents. The piping will retain all of its functional characteristics. The ESW System will still function as designed. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The function of the ESW System will not be affected by this change. Any failure of the new flow elements are bounded by existing analysis. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The use of the new flow elements to accurately provide flow indication is consistent with site procedures and does not alter any existing Technical Specifications. The ESW System will still function as designed. Therefore, no margin of safety will be reduced.



SE No.: 92-045

Source Document: USAR CR 92-026

Description of Change

This evaluation analyzes the use of "Merlin Gerin" and other electronic dosimeters into the PNPP Dosimetry Program.

Electronic type pocket dosimetry provides a measurement function only and in no way affects operation of the component. This equipment complies with the requirements in ANSI N 13.27-1981 "Performance Specifications for Pocket Warning Dosimeters/Ratemeters". Therefore, the consequences of an accident or malfunction of the dosimeter to safety previously evaluated in the USAR is not changed.

II. No. 56

III. No. As electronic type, pocket dosimetry provide monitoring of radiation exposure and is not a factor in any operational safety analysis. Therefore, no margin of safety will be reduced.

SE No.: 92-047

Source Document: LL&JED 1-92-014

### Description of Change

This evaluation analyzes installation of an electric device which will provide temporary power to Division 1 Containment Vessel and Drywell Purge (M14) damper actuator solenoids. This will permit ventilation air to the containment and the drywell during an electrical outage in RF03.

### Summary

- I. No. The operation of the M14 dampers will be performed using the normal Control Room switches. The LL&JED will be removed prior to the setting of containment integrity. Additionally, the Division 2 damper actuators will remain fully functional during the period of this installation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is no increased.
- II. No. This LL&JED is a simple use of an alternate power supply, at a time when the normal power is unavailable. The failure mechanism for the solenoid would permit the valve to fail close, which is the safe position. M14 operation is considered for refueling accidents. This configuration will not be used when refueling operations are being performed. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The M14 System is not required to be operable during Modes 4 or 5 except when moving irradiated fuel in containment or when conducting operations with a potential for draining the reactor vessel. This LL&JED will not be installed during these time frames. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-048, 92-098  
Source Document: MFI 1-92-16  
DCN 3882, Rev. 0

### Description of Change

This evaluation analyzes the Mechanical Foreign Item (MFI) which temporarily removes the upper mechanical stop and installs a modified single blade guide in Fuel Preparation Machine 1F11-E0001A. A modified blade guide is needed to handle double blade guides during RF03.

### Summary

- I. No. The modified blade guide will not be used for holding fuel bundles or irradiated control rods. The modified blade guide cannot be removed from the Fuel Preparation Machine until a bolt through the blade guide is removed. This prevents the removal of the modified blade guide and possible use of the Fuel Preparation Machine without clearing the MFI and restoring the upper mechanical stop which prevents an irradiated fuel bundle from being raised above seven feet minimum water shielding. Movement of fuel and irradiated control rods is controlled by the fuel movement check list. Use of this MFI will not adversely affect the refueling accidents contained in the USAR. Therefore, the probability of occurrence of the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Failure of the modified blade guide with subsequent load drop is bounded by the fuel bundle drop event analyzed in USAR Section 15.7.6. Installation of this modification does not adversely affect the performance of any safety system or components. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. MAP-1301, "Control of Heavy Loads", applies to the handling and movement of safety-related equipment and heavy loads in the vicinity of safe shutdown equipment or fuel racks containing fuel. This procedure will be used to ensure that the loads described in Technical Specifications are not exceeded. The total weight of this modification is less than that governed by MAP-1301. Therefore, the margin of safety will not be reduced.

SE No.: 92-049

Source Document: DCN 3779, Rev. 0

### Description of Change

This evaluation analyzes the incorporation of the GE Marathon control rod assembly description with the description of the original control rod assembly. The Marathon rod is designed to be compatible with or replace the GE rods currently in use.

### Summary

- I. No. The design, function, and operation of the Marathon rods is equivalent to that of the original rods. The Marathon rods use a combination of boron carbide and hafnium as neutron absorbing materials. The NRC has approved this for use. The number of control rods, rod pitch, and scram performance have not been affected. Existing rod events analyzed in the USAR have not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. The Marathon assembly has been designed as a direct replacement of existing control rod assemblies. As stated above, there is no impact upon the plant or its operation through use of Marathon rods. The Marathon rod is constructed of materials compatible with the existing plant. The stainless steel metal-water reaction for the marathon assembly is bounded by the existing design analysis. There is no hafnium metal-water reaction. Therefore, the possibility of creating an accident or malfunction of a different type does not exist.
- III. No. As stated above, the Marathon rod is designed as a direct replacement for the existing rod. Scram timing, rod pitch, and the number of rods used has not changed. The Technical Specification LCOs and surveillances associated with control rods have not been affected. Therefore, no margin of safety will be reduced.

SE No.: 92-050

Source Document: NR 92-S-033, Rev. 0

Description of Change

This evaluation analyzes the justification for continued operation of the High Pressure Core Spray (E22-HPCS) Diesel Generator with a HFA relay in the engine start circuit instead of the required Century series relay.

Summary

- I. No. The above mentioned relay was procured as Class 1E and has been proven to perform its safety-related function under all operating and test conditions. The response of the HPCS diesel generator to mitigate accident conditions has not been altered. The redundancy of the HPCS diesel generator has not been affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. As stated above, this relay creates no reduction of redundancy. The safety-related function of the HPCS diesel generator has not been affected. Hence, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The reliability of the control circuit remains unchanged. The ability of the HPCS diesel generator to respond to a Loss of Offsite Power or LOCA condition has not been compromised. Therefore, no margin of safety will be reduced.

SE No.: 92-051

Source Document: SCR 1-92-1000, 1-92-1001

### Description of Change

This evaluation analyzes setpoint changes which involve a modification to the Anticipated Transients Without Scram (ATWs) undervoltage trip. The new setpoint will allow a maximum trip voltage of 105 Vdc consistent with the minimum DC System voltage. The net affect of this change is to allow the uninterruptable power to be maintained as long as possible consistent with the 105 Vdc minimum battery voltage.

### Summary

- I. No. These setpoint changes will enhance overall Uninterruptable Power (R14) Supply System Inverter performance by prolonging inverter operations. There is no change in the design of the DC and AC power supplies to the ATWS Uninterruptible Power Supply System. The ATWS System and the Reactor Protection System designs and functions have not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The scope of these setpoints is to provide a reliable power source to the ATWS/RPS equipment. The setpoints do not impact the original system design functions. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The ATWS inverter undervoltage trip setpoint is not listed in the Technical Specifications. The ATWS/RPS operation and reliability are not affected by these setpoints. This modification to ATWS/RPS power supply will not reduce the margin of safety as addressed in the bases of the Technical Specifications.

SE No.: 92-053, 92-054

Source Document: GMI-0068, Rev. 4, TC-4  
GMI-0062, Rev. 4, TC-2

### Description of Change

This evaluation analyzes revising GMI-0068, "Instruction for Installation and Removal of the Shroud Head Separator", and GMI-0062, "Instruction for the Installation and Removal of Steam Dryer and the Main Steam Line Plugs". The changes incorporate disarming the Refueling Operations Atmosphere Radiation Monitor's (D17-K650) input to the Containment Evacuation Alarm while performing refueling activities.

### Summary

- I. No. The D17-K650 monitor will be disconnected during activities which result in excessive background radiation. The excessive background radiation masks the actual airborne radiation levels which the monitor is designed to measure. Disconnecting the input to the Containment Evacuation Alarm will prevent false alarm conditions. The monitor however, will still provide local indication and alarm features in the refuel area. Also, additional portable airborne monitors provided by Health Physics will be continuously monitoring radiological conditions to ensure adequate personnel protection is provided. This monitor nor the Containment Evacuation Alarm are not required for safe shutdown or accident mitigation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. Operation of safety-related systems is not affected by this change. More importantly, this change will ensure that Containment Evacuation alarms occur when valid high airborne radiation levels are present. Again, local alarms and indication functions of this monitor will be retained along with compensatory monitoring equipment. Therefore, no margin of safety will be reduced.



SE No.: 92-055

Source Document: MFI 1-92-026

### Description of Change

This evaluation analyzes the Mechanical Foreign Item (MFI) which installs an override switch which will allow operators the ability to temporarily silence the Containment and Drywell Evacuation Alarm horns so that communications are not compromised by the sounding of the horns.

### Summary

- I. No. Personnel in certain areas of the containment and drywell cannot hear the plant page or verbal instructions when horns are sounding. To improve personnel communications a manual spring return to "normal" override switch will be installed. The Evacuation Alarm System only provides notice of changing radiological conditions. It does not provide any mitigating actions during an accident. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The change does not defeat the automatic trips associated with the Evacuation Alarm System. The alarm system has no impact on the operation of equipment important to safety. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change will ensure that upon an evacuation alarm actuation operators will have the capability to maintain communications. The operation of safety-related equipment has not been impacted. Therefore, no margin of safety will be reduced.

SE No.: 92-056

Source Document: DCN 3759, Rev. 0

### Description of Change

This evaluation analyzes revising various P&IDs to permit the use of flexible hosing to route the Circulating Water (N71) System automatic vents' discharge to the floor drains.

### Summary

- I. No. The present drainage is uncontrolled and ends up into the floor drains. The use of hosing to perform this same function reduces the possible spread of contamination and minimizes personnel safety hazards. The use of the hoses do not impact N71 operation. Hose blockage would prevent vent operation. Ultimately this would somewhat degrade condenser performance due to air being trapped in the condenser. The loss of vacuum transient described in USAR Section 15.2.5 would not be adversely impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. See Item I above.
- III. No. Plant operation is not affected by this change. Further, the Technical Specifications are not impacted. Therefore, no margin of safety will be reduced.

SE No.: 92-057

Source Document: DCP 87-681A, Rev. 0

### Description of Change

This design change will modify the valve design of various safety-related motor operated valves with respect to packing materials and configuration only. The new packing configuration utilizes additional springs/Belleville style washers to create a compressive force on the valve packing assembly which reduces the potential for failure and leakage.

### Summary

- I. No. This design change utilizes a modified packing configuration that is an improvement over the original configuration provided with the valves. Packing materials and additional components utilized to implement this change reflect a method, accepted for use by the BWR industry, for improving the sealing function of safety-related valves in steam and water applications. The pressure/fluid retaining functions of the valves will be maintained. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This design change utilizes alternate packing/bushing material configurations to achieve an enhanced sealing function on the affected safety-related valves. The failure of any of these new packing assembly materials would result in the same type of packing failure as the present design of the valves. Similarly, the failure of either the springs or Belleville washers installed does not create a different type of equipment malfunction because the packing assembly would still be retained by the gland seal nuts, thus maintaining a seal configuration equivalent to the original valve packing assembly design. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. As stated above, this change will be an enhancement over that of the original valve design. Furthermore, each valve will be appropriately tested to ensure proper operation, including timed tests where required, in accordance with Technical Specification requirements. Therefore, the margin of safety as defined in the bases of Technical Specifications will not be reduced.

SE No.: 92-059

Source Document: MFI 1-92-030

### Description of Change

This evaluation analyzes the installation of a Mechanical Foreign Item (MFI) to provide a Torque Thrust Cell (TTC) measuring device on the High Pressure Core Spray (E22) motor operated valves (MOV) 1E22-F012 and 1E22-F015 to support diagnostic testing per Generic Letter 89-10.

### Summary

- I. No. The installation of the TTC on the subject MOVs does not reduce the reliability, compromise the operability or design margin of this safety-related component to accomplish its safety function. The installation meets all applicable codes and standards. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The installation of the MFI considered both normal and abnormal operation. The added load of the TTC will not affect the normal operation of the MOV nor will it have an adverse affect during a seismic event. Operability of the E22 System has not been affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This MFI will not impact Technical Specifications nor will it impact the operability of the E22 System. Therefore, no margin of safety will be reduced.

SE No.: 92-061

Source Document: OM16F Physical Security Plan, Rev. 17

Description of Change

This evaluation analyzes changes made to OM16F, Physical Security Plan. The changes have been evaluated to ensure that the effectiveness of the Perry Nuclear Power Plant Security Plan has not been reduced and to ensure that the requirements of 10 CFR 73, Physical Protection of Plants and Materials, are met. Site Protection must be contacted for further details since this is considered "SAFEGUARDS" information.

Summary

- I. No. OM16F describes the comprehensive Physical Security Program and therefore, does not affect the occurrence or consequences of an accident or malfunction of equipment.
- II. No. OM16F does not direct the operation of plant systems or equipment and, therefore, does not create the possibility for an accident or malfunction.
- III. No. OM16F does not reduce the margin of safety as defined in the bases for Technical Specifications.

SE No.: 92-062

Source Document: USAR CR 92-033

Description of Change

This evaluation analyzes incorporating editorial revisions to P&ID 808-302 Sheets 2 and 3, Revision C, Reactor Protection (C71) System, into the USAR. This revision is in conjunction with General Electric Drawing Reconciliation Program.

Summary

- I. No. This editorial change does not modify the C71 System design, performance, or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is editorial in nature. No system or component function has been altered. Therefore, no margin of safety will be reduced.

SE No.: 92-063

Source Document: TXI-0142, Rev. 0

Description of Change

This evaluation analyzes a temporary instruction which describes the methodology for chemically cleaning calcium carbonate scale from the Residual Heat Removal (E12) System Heat Exchanger (Emergency Service Water side).

Summary

- I. No. The chemical injection fittings and hose will be installed in existing flush connections. The Emergency Service Water (ESW) System loop will be made inoperable during performance of the cleaning process. The chemical used in the cleaning will not detrimentally affect the E12 System or ESW System. Failure of the cleaning equipment and the subsequent flooding would be bounded by existing flooding analyses contained in the USAR. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. The effects of flooding that could occur from failure of the chemical cleaning equipment are bounded by analyses contained in the USAR. The installation is to existing connections, the pumping equipment is portable, and the application of the chemical has been approved by General Electric for the heat exchangers. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The cleaning process is performed when the ESW loop is inoperable. The chemical is compatible to plant components. Therefore, no margin of safety will be reduced.



SE No.: 92-064, 92-065

Source Document: NR 92-N-057, Rev. 0  
NR 92-N-056, Rev. 0

Description of Change

This evaluation analyzes the temporary "Repair and Use-As-Is" disposition of broken ASME test lines located in the high pressure condenser.

Summary

- I. No. The lines are used for the performance of ASME testing and have no function during normal operations. The broken areas will be capped/plugged. Failure could lead to slightly degraded condenser efficiency (due to degraded vacuum). The loss of vacuum event described in USAR Section 15.2.5 would not be adversely impacted. The condenser is nonsafety and is not required for safe shutdown. A permanent fix for these lines will be implemented at a later date via DCP 92-066 scheduled for RF04. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. Safety-related equipment is completely unaffected by the proposed disposition. Therefore, no margin of safety as defined in the Technical Specifications will be reduced.

SE No.: 92-066

Source Document: MFI 1-92-035

### Description of Change

This evaluation analyzes a Mechanical Foreign Item (MFI) which installs a temporary five horsepower pump in the reactor cavity during RF03.

### Summary

- I. No. Installation of this pump is a proven method to dissipate heat and alleviate thermal stratification within the core and aid refueling operations. Pumping water, at the 689' elevation of the containment, will remain within the original flowpath for Fuel Pool Cooling and Clean Up (G41). The LOCA, the loss of AC power, and the seismic analyses of the plant are not affected by this installation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The installation of this temporary pump will not be near moving equipment that is important to safety. As stated above, accident analysis and plant seismic analysis are not impacted. The load of the pump is bounded by existing analyses. Installation of the pump cannot damage/puncture the pool walls. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This installation aids the G41 capability to remove heat and minimize stratification within the vessel. The temporary pump has no impact on any Technical Specification. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-067

Source Document: NR 92-N-062, Rev. 0

### Description of Change

This evaluation analyzes the temporary removal of thirteen Shroud Head Stud (SHS) Bolts from the Shroud Head/Separator Assembly and its effect on power operation during fuel cycle 4.

### Summary

- I. No. The Shroud Head/Separator Assembly will continue to perform as designed since General Electric analysis allows that only sixteen SHS bolt out of thirty-two assemblies are required to hold the separator in place. There is no impact upon reactor pressure vessel integrity. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The temporary removal of SHS bolt removes the potential where the nut could rotate completely off the stud and enter the Reactor Recirculation System piping. Reactor vessel integrity is not impacted. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. As stated above sixteen SHS Bolts per General Electric analysis, are sufficient to retain the Shroud Head in place. There is no impact upon reactor vessel integrity. Therefore, the margin of safety as defined in the bases for a Technical Specification will not be reduced.

SE No.: 92-068

Source Document: NR 92-S-103, Rev. 0

### Description of Change

This evaluation analyzes the interim Use-As-Is disposition of not being able to place Residual Heat Removal (RHR-E12) System Heat Exchanger A into demineralized water lay-up.

### Summary

- I. No. The RHR Heat Exchangers have been inspected to determine the effects of corrosion on the carbon steel components. Fouling tests have been conducted on a routine basis because of the inability to put the heat exchangers into demineralized water lay-up due to leaking Emergency Service Water System valves. Based on the information provided and the chemical cleaning of the heat exchangers during RF03, the fouling factor will remain below maximum values until RF05. The integrity of the heat exchangers will not be impacted during the time frame of this NR. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The inability to place the RHR Heat Exchangers in lay-up may effect the life expectancy of the heat exchanger. However, the heat exchanger will continue to maintain its integrity for the duration of this NR. There are no changes to the plant, ESW System, RHR System or the RHR Heat Exchanger as a result of this NR. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. No changes have taken place in the operation of the RHR Heat Exchangers as a result of this NR. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 92-069

Source Document: MFI 1-92-037

Description of Change

This evaluation analyzes a Mechanical Foreign Item (MFI) which installs a Torque Thrust Cell (TTC) measuring devices on several motor operated valves.

Summary

- I. No. The installation of the TTC on the subject MOVs does not reduce the reliability, compromise the operability or design margin of the valves. The seismic capabilities of the associated plant systems are not adversely impacted. The pressure boundaries of the associated plant systems will not be affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The installation of the MFI considered both normal and abnormal operation. The added load of the TTC will not affect the normal operation of the MOV nor will it have an adverse affect during a seismic event. The installation of the MFI is within the analysis of an existing acceptable condition. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The installation of the TTC on the subject MOVs does not reduce the reliability, compromise the operability, or design margin of the valves. Therefore, the margin of safety will not be reduced.

SE No.: 92-070

Source Document: DCP 92-058, Rev. 0

### Description of Change

This design change modifies the N4D Feedwater sparger by removing the first and fourth feedwater nozzles located clockwise (looking outward) from the inlet tee and then installing mechanical plugs.

### Summary

- I. No. The design specification for the mechanical plugs is the same for the feedwater sparger. Plugging the nozzle and seal welding the plug to the feedwater sparger prevents feedwater flow from impinging on any part of the Reactor Pressure Vessel wall or reactor internals that have not already been evaluated for the effects of feedwater flow. The potential effects for thermal fatigue of any internal reactor component due to leakage are therefore eliminated. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. As stated above all original design specifications are met by the new design. The plugs are type 316L stainless steel which are resistant to IGSCC. The configuration is designed to ASME B and PV Code, Section III, Subsection NG. This will ensure the plugs remain intact under all service conditions. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The repaired feedwater sparger meets all of the original design specification requirements. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-071

Source Document: ONI-R10, Rev. 2, TC-1

### Description of Change

This evaluation analyzes a change to Off-Normal Instruction R10 which permits the bypassing of Reactor Core Isolation Cooling (RCIC-E51) System instrumentation during a plant loss of power event.

### Summary

- I. No. The basis for the RCIC high temperature isolation is to isolate the RCIC System after a line break of the RCIC System is sensed. This isolation bypass during a plant loss of power event will prevent the loss of RCIC when it maybe required for operation. RCIC isolation can still be performed manually if a RCIC line break should occur. This change has no impact upon any of the Emergency Core Cooling Systems (ECCS). The RCIC line break remains bounded by existing USAR analyses. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. Compensatory actions are available to isolate the RCIC System if a RCIC line would break while the high temperature instrumentation is bypassed. There is not impact upon the ECCS. RCIC line break event remains bounded. RCIC function and operation will not be impacted. Therefore, the possibility of creating an accident or malfunction of equipment of a different type does not exist.
- III. No. This activity will reduce the calculated core damage probability by several orders of magnitude during a plant loss of power event. The activity is prudent and it does not adversely impact RCIC operation nor impact ECCS operation. Hence, no margin of safety will be reduced.



SE No.: 92-072

Source Document: FCR 16459

### Description of Change

This evaluation analyzes a Field Change Request which provides the technical details for installation of a temporary man-basket and two radiation shields in the reactor vessel to facilitate the modifications to the feedwater sparger per DCP 92-058.

### Summary

- I. No. The safe load handling requirements imposed on the installation of the temporary man-basket and radiation shields exceed the requirements described in the USAR and NUREG-0612. The redundant safety factors achieved through the use of dual lifting paths and rigging equipment sized for twice the load of the lifted item ensure that no single failure will result in the man-basket or shields impacting the core support structure. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The additional load handling requirements provided by FCR-16459 ensure that no single failure path exists that could result in a drop of the man-basket or shields into the reactor vessel. In addition, these activities have no interaction with any safety-related equipment required for the mitigation of any accident. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Technical Specification 3/4.9.7 discusses movement of heavy loads over spent fuel. Since the weight of each of these items is less than that of a fuel bundle and its associated handling tool, this section is not violated. In addition, the requirements of NUREG-0612 are exceeded, providing assurance that the loads will not drop. Technical Specification 3/4.6.1 requires primary containment integrity only when handling irradiated fuel, during core alterations, and during operations with the potential to drain the reactor vessel. The installation of the man-basket and shields does not constitute any of these scenarios. Therefore, the margin of safety as defined in the Technical Specification bases will not be reduced.

SE No.: 92-073

Source Document: USAR CR 92-028

Description of Change

This evaluation analyzes a modification to the USAR which eliminates the postulated breaks RHSI and RHSILL of the Residual Heat Removal (RHR-E12) System.

Summary

- I. No. This change incorporates the results of General Electric Design Report 23A4577, Revision 1. Specifically, the report states that these two break locations are not required to be postulated due to stress analyses performed at the break locations. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-074

Source Document: USAR CR 92-022

### Description of Change

This evaluation analyzes revising USAR 9.5.1.4, "Inspection and Testing Requirements", to list the NFPA Codes used as reference in the development of the fire protection system inspection and testing.

### Summary

- I. No. This change involves clarification of the code bases for inspection and testing of fire suppression systems. No circuits or equipment will be modified. No new fire hazards or combustibles will be added to any plant area. The inspection and testing will remain within previously evaluated NFPA Code requirements. All fire protection and safe shutdown systems will operate as previously analyzed. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The changes to the USAR to define code references only affect the surveillances of the fire protection systems. Operation of the systems in response to a fire will not be affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Only administrative aspects of the Fire Protection Program are described in the Technical Specifications. These consist of review and audit responsibilities, the need for administrative procedures, and reporting requirements. The details and the bases for the surveillance of fire protection systems which could be affected by the NFPA Codes are not within the scope of the Technical Specifications. Changes to any fire protection procedures would not affect the bases or requirements for any other system described in Technical Specifications. It therefore follows that the change does not reduce the Technical Specification margin of safety as it relates to fire protection.

SE No.: 92-075

Source Document: PSTG, Rev. 2

### Description of Change

This evaluation analyzes various changes to the Perry Specific Technical Guidelines (PSTG). The changes include combining several guidelines into one overall guideline, clarifying the operations of the Reactor Core Isolation Cooling (RCIC) System and clarifying the conditions as to when to vent the containment.

### Summary

- I. No. These changes provide the necessary operator actions to protect the plant and its equipment during emergency conditions. Plant system/component operations do not adversely impact accident analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. Plant systems/components are operated within their design capabilities. Accident analysis is not affected. Therefore, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. The PSTGs provide operator direction which will not adversely impact the plant design or its analyses. Therefore, no margin of safety will be reduced.

SE No.: 92-076

Source Document: NR 92-S-122, Rev. 0

### Description of Change

This evaluation analyzes the interim Use-As-Is disposition of the incompatible and interchanged tube fittings used for plant instrumentation. This will allow instrument operation up to the end of the Refueling Outage 3 (RF03).

### Summary

- I. No. This justification is based upon an individual evaluation of each instrument with regard to its functionability. Pressure integrity of each instrument was maintained during the previous operating cycle. Each instrument will experience lower than normal operating pressures and temperatures throughout the outage. Hence, fitting failure is not likely. Further, fitting failure is bounded by the instrument line pipe break described in USAR Section 15.6.2. Therefore, the interim Use-As-Is disposition does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR.
- II. No. The majority of the instruments are not required to be functional during RF03. Since the Reactor Pressure Vessel (RPV) is depressurized, reducing the general plant/system pressures, the tube fitting configurations do not violate the accident analysis for an Instrument Line Pipe Break. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. A review of the Technical Specification Bases with respect to the instruments that have intermixed tube fitting components and are required to be operational during RF03 was conducted. Since only one of these instruments has a Technical Specification implication during RF03, it was analyzed for possible reduction of margin due to the fitting component mixing. Level transmitter 1B21-NO81A is associated with RPV Level 1 and RPV Level 2 isolation functions. Technical Specification Bases 3/4.3.2 discusses the bases for these isolation actuation instruments. The Level 1 isolation function is not required during RF03. The Level 2 isolation function is required during RF03. Based upon the isolation logic and instrument redundancy, any failure of the instrument tube fitting would not prevent the required isolation signal. Therefore, the margin of safety as defined in the bases for the Technical Specifications will not be reduced.

SE No.: 92-077

Source Document: NR 92-S-128, Rev. 0

### Description of Change

This evaluation analyzes the Use-As-Is disposition of the Main Steam Line flow element scallop orifice, 1B21-N0005B.

### Summary

- I. No. The dimension specified in the description of the nonconformance refers to the gap between the ends of the one-inch fillet weld, and not the minimum orifice dimension. However, video evidence shows the scallop orifice to be oblong, rather than round, indicating that some material may have been removed. A review of video evidence of the scallop hole is not conclusive with respect to the extent of erosion. This condition is limited to a small portion of the flow element, and based on comparisons to PNPP Unit 2 flow elements, appears to be occurring at a rate which is not considered significant. Since the structural integrity of the subject flow element is not affected by this condition. Continued degradation is not anticipated to have an effect on the structural integrity or flow characteristics of the flow element. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the U V is not increased.
- II. No. This condition is limited to the potential erosion discovered on the main steam flow element scallop orifice described above. This condition does not represent a change to existing design codes, and maintains existing design requirements and margins of the originally evaluated design. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The structural integrity and flow characteristics of the subject flow element are not affected by this condition. Continued degradation is not anticipated to have an effect on the structural or flow characteristics of the flow element. Therefore, no margin of safety will be reduced.

SE No.: 92-078

Source Document: DCP 92-075, Rev. 0

### Description of Change

This design change will remove an appendage containing valve 1R46-F0510A/B from the jacket waterside of the Division 1 and 2 Diesel Generator lube oil coolers.

### Summary

- I. No. As described above, the scope of this change is limited to the Diesel Generator's jacket water system. All work will be performed in accordance with existing plant installation specifications, and the new configuration will satisfy the requirements of the existing applicable line specification for this portion of the jacket water system. The removal of these appendages will not prevent sampling of the jacket water nor impact the ability to drain the heat exchanger. The accident analysis described in USAR Chapter 15 will not be affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. By removing these appendages, system reliability will increase as areas of potential jacket water leaks will be eliminated. Operability and availability of the Diesel Generators will not be affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change will increase the reliability of the Diesel Generators by reducing the potential for leakage. Technical Specification 3/4.8 dealing with the on-site power supplies will not be impacted. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.



SE No.: 92-079

Source Document: DCP 90-214, Rev. 0

### Description of Change

This design change relocates the high/high level detectors on three backwash settling tanks located in the Radwaste Building. These level detectors are located on the Reactor Water Cleanup Filter Demineralizer Backwash Settling Tank (RBST), Condensate Filter Backwash Settling Tank (CBST), and Fuel Pool Filter Demineralizer Backwash Settling Tank (FBST).

### Summary

- I. No. This change relocates the high/high sludge level switches to a higher tank elevation while still maintaining sludge level below the decant elevation. The relocated level switches will either use another nozzle in the tank, which are of the same design as the existing nozzles, or will be installed in new nozzles which will be installed in accordance with the original design requirements. As a result, the function, design and operation of the system has not changed. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The settling tank and level instruments are nonsafety and are not relied upon by systems important to safety. Only post accident offsite dose consequences would be affected as a result of the analyzed tank failure scenarios. However, radionuclide concentrations as a result of these postulated failures would be below the limits stated in 10CFR20, Appendix B. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The change to the inventory activity of the respective tanks does not violate the limits specified in Technical Specifications. Therefore, no margin of safety will be reduced.

SE No.: 92-080

Source Document: DCP 90-158, Rev. 3

### Description of Change

This design change replaces portions of the Reactor Water Cleanup (RWCU-G33) System SA106 carbon steel piping with electropolished, preoxidized SA376 stainless steel piping. This revision of the design change releases an engineering hold order issued due to an incomplete piping stress reanalysis.

### Summary

- I. No. This design change is an ALARA consideration to reduce the excessive amount of radiation exposure received by the workers inside of the drywell. The material was chosen because of its superior mechanical strength and welding characteristics. The material is recommended in NUREG-0313 as a stainless steel resistant to Intergranular Stress Corrosion Cracking (IGSCC) in welds on BWR piping. The requirements of the ASME Boiler and Pressure Vessel Code, Section III, Class 1, the 1974 edition with addenda through Winter of 1975 govern the original and replacement designs. The function and configuration of the RWCU System has not been changed. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change does not compromise the function of the RWCU System, as it maintains the original design requirements. The design, quality and qualification of this pipe replacement maintains or improves the integrity of the RWCU System compared to the design evaluated previously in the USAR. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. As stated above the piping replacement is manufactured and installed to the original ASME codes. The function and configuration of the system does not change. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 92-081

Source Document: NR 92-S-170, Rev. 0

### Description of Change

This evaluation analyzes the interim Use-As-Is disposition of safety-related pneumatic control valve tube fittings supplied under SP-607-01. This disposition allows operation up to the end of the RF03 outage.

### Summary

- I. No. The fittings have maintained their pressure integrity during previous normal operating conditions. Interim operation of the fittings during RF03 would be at pressures below normal operating pressures. Fitting failure would result in a loss of air which in turn would fail the valves to their designed failure position. The operation of the valves has not been affected. The loss of instrument air event described in USAR Section 15.2.10 is not affected by the use of nonconforming fittings. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The tube fitting failure is bounded by the accident analysis for the loss of instrument air. This failure would cause a loss of instrument air to the pneumatic control valves which would fail the valves to their analyzed fail safe position. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This interim Use-As-Is does not create a situation that has not been previously analyzed. A leak or total fitting blow-out, the valves would fail to their designed fail safe position. The operation of the valves has not been affected. Therefore, the margin of safety will not be reduced.

SE No.: 92-082

Source Document: NR 92-S-158, Rev. 0

### Description of Change

This evaluation analyzes the interim Use-As-Is disposition of tube fittings associated with instruments in H22 panels, SP-90 panels and racks, SP-49 (safety-related) panels, and SP-594 panels. The interim Use-As-Is disposition allows instrument operation up to the end of the RF03 outage.

### Summary

- I. No. The justification for the interim Use-As-Is is based on the current shutdown status of the plant and the fact that the tube fittings have maintained the pressure integrity of their specific systems with normal operating temperatures and pressures during the previous plant operating cycles. The instruments in question will still function as designed. Instrument line failure is bounded by existing break analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Instrument tube fitting failure is bounded by the accident analysis for an instrument line pipe break. Instrument operability is not impacted. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The instruments in question will still function as designed. Instrument line failure is bounded by existing break analysis. Therefore, no margin of safety will be reduced.

SE No.: 92-083

Source Document: DCN 3804, Rev. 0

Description of Change

This evaluation analyzes an editorial revision P&ID 206-050; One Line Meter and Relay Diagram, Class 1E, 125 Volt DC, Division 3; to correct drawing references.

Summary

- I. No. This is an editorial change. There is no impact upon the system's design, function or operation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The change is editorial in nature. It will not change any plant feature, equipment function, or equipment availability. Therefore, no margin of safety will be reduced.

SE No.: 92-084

Source Document: NR 92-N-166 Rev. 0

### Description of Change

This evaluation analyzes the interim Use-As-Is disposition which permits operation of the Feedwater System and the Corrosion Product Monitor without the corrosion product monitor sample probe 1B21-D0014.

### Summary

- I. No. The sample probe broke off within the sockolet. A radiograph inspection of the sockolet area and magnetic particle tests of the welds were performed and no defects or cracks were identified. Therefore, the pressure integrity and system function of the Feedwater System is not affected by the broken/missing sample probe. The probe has been recovered. Therefore, it has no further impact on feedwater or reactor coolant systems.

The feedwater corrosion product analysis is required by General Electric for fuel warranty. To date corrosion product concentrations have been well below fuel warranty limits, no fuel cladding failures have been attributed to corrosion product fouling. Chemistry has reviewed the feedwater data over the first three fuel cycles and has not identified any adverse trends which may identify the time of probe failure or errors in sampling. Therefore, interim operation of the Corrosion Product Monitor and Feedwater System without the sample probe is acceptable. Therefore, it will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR.

- II. No. The Corrosion Product Monitor is nonsafety-related and has no affect on systems/components which are relied upon to mitigate an accident or which are important to safety. The broken sample probe has been recovered and removed from the piping system, it has no further impact on feedwater or reactor coolant systems. Although the sample probe is missing, the sample piping is intact and conforms to the original design and construction standards. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.

- III. No. The Corrosion Product Monitor or the insoluble corrosion product analysis is not addressed by Technical Specifications. Even though the potential exists for additional release of radioactivity, the consequences of the off-site dose to unrestricted areas would still be below Licensing and Technical Specification limits. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-085

Source Document: USAR CR 92-040

### Description of Change

This evaluation analyzes the incorporation of Reload 3, Cycle 4 into USAR Appendix 15B, "Reload Safety Analysis," and into the Plant Data Book Section F, "Core Operating Limits Report." The reload analysis is performed using the methodologies contained in the NRC approved General Electric Report NEDE-24011 entitled "General Electric Standard Application for Reactor Fuel (GESTAR II)."

### Summary

- I. No. The only change to the plant is the introduction of a new fuel type and core design. No other plant systems or components are altered. Accident analysis has not been adversely impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Plant operation which conforms to the analyzed envelope of USAR Chapters 4, 5, and 15 and with the new Core Operating Limits Report curves, will allow conformance with the GESTAR II analysis. The GESTAR II analysis has been accepted by the NRC as comprehensive for ensuring that fuel designs will perform within acceptable bounds. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The reload does not alter the design or function of any plant system, outside of the fuel. The fuel design was produced using the NRC approved methods described in GESTAR II. The design satisfies the acceptance criteria of GESTAR, which is consistent with the MCPR safety limit, and the bases of the other fuel-related Technical Specifications. Therefore, no margin of safety will be reduced.



SE No.: 92-086

Source Document: DCP 92-056, Rev. 0

#### Description of Change

This design change removes the check valve internals from Liquid Radioactive Waste (G50) System valves OG50-F0641 and OG50-F0642 to prevent the valves from plugging with filter aid material.

#### Summary

- I. No. The check valves prevented backflow of flush water into the filter aid tank during flushing operations. Flushing of the pumps and their discharge piping is required to prevent build-up of the filter aid material. The check valve function will be accomplished via manual operation of the isolation valves. Manual operation of the isolation valves is equivalent to the check valve function. The G50 equipment is not required to mitigate accidents or transients. Hence, G50 equipment failure does not impact accident analysis described in USAR Chapter 15. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Failure of the G50 equipment does not impact systems which are safety-related or are used to mitigate accidents. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The G50 System is not addressed by Technical Specifications. The system is not required for accident mitigation. Therefore, no margin of safety will be reduced.

SE No.: 92-087

Source Document: DCN 3120, Rev. 0

### Description of Change

This evaluation analyzes an editorial revision to P&ID 912-617, Fuel Handling Building Ventilation (M40) System, to add a note defining acceptable operating air flow rates.

### Summary

- I. No. This change only defines acceptable M40 System operating air flow rates. Technical specification 3/4.7.7 currently defines the M40 exhaust fan flow rates as + 10% of design. Operation of the supply fans within this envelope does not reduce the ability of the M40 System to perform its design function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change only clarifies the acceptable operating limits for the M40 System's flow rates. This change does not affect the function or operability of the M40 System. Air flow directions in the Intermediate Building and the Fuel Handling Building were verified as acceptable in the preoperational/acceptance test. Area temperatures are acceptable per Periodic Test M99-P001. This change does not change any information in the Technical Specifications or alter previously described requirements. Therefore, no margin of safety will be reduced.

SE No.: 92-088

Source Document: DCP 91-070, Rev. 0

### Description of Change

This design change modifies various drain line configurations associated with the Low Pressure Core Spray (LPCS-E21) System, the High Pressure Core Spray (HPCS-E21) System, and the Residual Heat Removal (RHR-E12) System.

### Summary

- I. No. The modifications installed by this change serve to enhance the isolation capability by minimizing leakage through the normally closed, manually operated drain lines. Since system leakage is minimized Emergency Core Cooling Systems' (ECCS) reliability is considered to be maintained and enhanced. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The modification installed by this change is limited to the nonsafety-related portions of the ECCS. The affected equipment and piping drain lines to the Liquid Radwaste System have no impact on safety-related components. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. As stated above this change serves to enhance the ECCS isolation capability to minimize leakage. This maintains ECCS reliability/availability as required by Technical Specifications. Therefore, no margin of safety will be reduced.

SE No.: 92-089

Source Document: EMARP 0008, Rev. 6

### Description of Change

This evaluation analyzes the incorporation of additional monitoring/sampling for zebra mussels into the Environmental Monitoring and Reporting Program (EMARP).

### Summary

- I. No. This change increases the scope of an environmental monitoring program designed to gather information that will be used to minimize the probability of flow blockage in raw water systems. This change does not alter the design of any plant system. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change deals only in the monitoring of incoming raw water. The change does not alter any plant system design. The activities required by the Environmental Protection Plan (EPP) are not affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. As stated above this change will increase the monitoring and sampling requirements for zebra mussel veligers. This change enhances the ability to fulfill the requirements of the EPP Corbicula monitoring/sampling program. Therefore, no margin of safety will be reduced.

SE No.: 92-090

Source Document: DCN 3671, Rev. 0

### Description of Change

This evaluation analyzes revising various Nuclear Boiler Process Instrumentation (B21) System P&IDs to clarify design information based on General Electric Drawing Reconciliation Program.

### Summary

- I. No. This editorial change does not modify B21 System performance or function. Accident analysis is not impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is editorial. No system or component function has been altered. The clarifications are consistent with the Technical Specifications and the USAR. Therefore, no margin of safety will be reduced.

SE No.: 92-091

Source Document: NR 92-S-224, Rev. 0

### Description of Change

This evaluation analyzes the interim Use-As-Is disposition of a check/relief valve installed in the High Pressure Core Spray (HPCS-E22) System Diesel Generator's (DG) Lube Oil System with the relief pressure above design code.

### Summary

- I. No. The DG lube oil piping and components are designed and installed to satisfy ANSI B31.1. Operation at the higher pressure is well below the ANSI allowables. Lube oil operation in this configuration has no impact upon the function or operation of the HPCS DG. The accidents evaluated in USAR Chapter 15 are not affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. The lube oil components and piping remain in compliance with ANSI B31.1. HPCS DG function and operation is not impacted. Accident analysis is not affected. Therefore, the possibility of creating an accident or malfunction not previously evaluated does not exist.
- III. No. Technical Specification 3/4.8 dealing with the onsite power supply is not impacted. HPCS DG function and operation is not affected. Therefore, no margin of safety will be reduced.

SE No.: 92-093

Source Document: DCP 90-0228, Rev. 0

Description of Change

This design change removes the Radwaste Clothes Dryer and RadKleen Dry Cleaner from the Turbine Power Complex EL 593'-6".

Summary

- I. No. The removal of these items does not affect the operation or function of any plant system or component. The structural adequacy of the Turbine Power Complex will not be impacted. Accident analysis is unaffected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The removal of the dry cleaner and dryer does not impact any plant function or operation. As a result, no margin of safety will be reduced.



SE No.: 92-094

Source Document: DCN 3884, Rev. 0

Description of Change

This evaluation analyzes an editorial revision to i&ID 302-601, Reactor Recirculation System, which clarifies the notes and references.

Summary

- I. No. This editorial change does not modify the Reactor Recirculation System's performance or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is editorial in nature. No system or component function has been altered. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-095

Source Document: NR 92-S-031, Rev. 1

### Description of Change

This evaluation analyzes the temporary Use-As-Is disposition of a six-inch relief valve header in the Residual Heat Removal (RHR-E12) System which is in noncompliance with ASME Code, Section III, Subsection NC 3677.3.

### Summary

- I. No. This evaluation is limited to the use of the Steam Condensing Mode (SCM) of the RHR System. SCM is not required for safe shutdown nor is it required for accident mitigation. There is no other impact on the RHR System. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. This nonconformance does not impact safe shutdown or any accident mitigation function. Therefore, the possibility of creating an accident or malfunction of a different type does not exist.
- III. No. The inoperable status of SCM does not adversely impact the bases of Technical Specifications 3/4.6.3 and 3/4.6.1.5. Plant safe shutdown capability or accident mitigation functions are not affected. Therefore, no margin of safety will be reduced.

SE No.: 92-096

Source Document: DCP 91-229, Rev. 0

### Description of Change

This design change will facilitate ongoing condenser in-leakage testing activities by permanently installing testing apparatus as a means to inject a sample gas into the condenser without the need to enter a "High Radiation Area." This design will eliminate unnecessary exposures and save valuable man-hours that would be required to install and remove the apparatus each time testing is done.

### Summary

- I. No. The condenser is nonsafety and is not required to support the safe shutdown of the reactor. Failure of this testing apparatus would increase in-leakage to the condenser. Condenser loss of vacuum has been analyzed in USAR Section 15.2.5 and in-leakage from the apparatus failure would not adversely impact the 15.2.5 analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The apparatus has no affect upon any system or plant operation. Failure of the device and the subsequent condenser in-leakage it creates falls within the amount identified in the USAR. As such, the Main Condenser and Offgas System and their associated Technical Specification remain unaffected. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-097

Source Document: DCN 3755, Rev. 0

### Description of Change

This evaluation analyzes revising P&ID 302-643, Residual Heat Removal (RHR-E12) System, to change the position of valve 1E12-P0102 from normally open to locked closed. The change will permit the use of a water test for the "Type C" test on penetration P106, Reactor Core Isolation Cooling (RCIC-E51) System Exhaust Penetration. (Reference NR 92-S-031, Rev. 1 and Safety Evaluation 92-095.)

### Summary

- I. No. With the RHR Steam Condensing Mode of operation inoperable, the position of 1E12-P0102 has no impact upon RHR operation. RCIC operation is also not impacted by the position of 1E12-P0102. Containment integrity will not be impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. This design configuration will not impact RCIC or RHR functionability. Containment integrity will not be affected. Therefore, the possibility of creating an accident or malfunction of a different type does not exist.
- III. No. Containment isolation design and testing arrangement remains as described in Technical Specification 3/4.6.4. There is no impact upon the RCIC and RHR Systems. Therefore, no margin of safety will be reduced.

SE No.: 92-099

Source Document: TXI-0144, Rev. 0

### Description of Change

This evaluation analyzes a temporary instruction which describes the operation of the Main Condenser Evacuation System in a manner which will allow drawing condenser vacuum in stages.

### Summary

- I. No. This instruction permits the operation of the Main Condenser Evacuation System in a manner different than described in USAR Section 10.4.2. The new operation is consistent with the guidance contained in GEK-98057. This operation does not modify or alter the evacuation system in any way. Failure of the evacuation system would result in a slow loss of condenser vacuum. This event would be bounded by the loss of vacuum event described in USAR Section 15.2.5. No other accident event will be affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety is not increased.
- II. No. As stated above, the operation of equipment is consistent with the manner described in the USAR. The only possible accident/transient which could be caused by this instruction is a loss of vacuum which has already been analyzed in the USAR. Therefore, the possibility of an accident or malfunction of creating a different type than any evaluated previously in the USAR does not exist.
- III. No. No equipment or parameters which are discussed in the Technical Specifications are affected. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-100

Source Document: DCN 3722, Rev. 0

Description of Change

This evaluation analyzes a revision to P&ID 302-791, Emergency Service Water (P45) System, which deletes a normally open (NO) reference from valves 1P45-F0659A/B and corrects a drawing reference mark to properly identify the liquid radwaste discharge tie-in.

Summary

- I. No. This editorial change does not modify P45 System performance or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is editorial in nature. No system design or function have been altered. Therefore, no margin of safety will be reduced.

SE No.: 92-101

Source Document: DCN 3770, Rev. 0

Description of Change

This evaluation analyzes an editorial revision to P&ID 912-613, Intermediate Building Ventilation (M33) System, which corrects a MPL reference for a panel designation.

Summary

- I. No. This editorial change does not modify M33 System performance or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is editorial in nature. No system design or function has been altered. Therefore, no margin of safety will be reduced.



SE No.: 92-102

Source Document: LL&JED 1-92-49  
LL&JED 1-92-50

Description of Change

This evaluation analyzes the installation of two electrical jumpers which bypass various pump and valve interlocks in the Residual Heat Removal (RHR-E12) System.

Summary

- I. No. The RHR System will still operate as described in the USAR. Compensatory operator actions will be taken to ensure system operation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. See Item I above.
- III. No. The RHR System with the compensatory actions will still operate as designed. Hence, no margin of safety will be reduced.

SE No.: 92-103

Source Document: PAP-1917, Rev. 3, TC-1

### Description of Change

This evaluation examines changes to PAP-1917, "Fire Protection Training Program". Changes made included the transfer of responsibility for the administration of the Safe Shutdown Training Program and the inclusion of Fire Brigade Training Program modifications.

### Summary

- I. No. All changes made were found to be consistent with the fire protection requirements of the USAR. No plant systems, components, or buildings will be affected. Therefore, the probability of an occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR is not increased.
- II. No. All changes made to this procedure are consistent with the fire protection requirements of the USAR. There is no impact upon any plant system or component. Therefore, the possibility of creating an accident or a malfunction different from any previously evaluated in the USAR does not exist.
- III. No. The Fire Protection Program is referenced under Sections 6.5.1.6 N, 6.5.2.8 E, and 6.8.1 H of the Technical Specifications. All changes made in this procedure are consistent with the Technical Specifications and the USAR. Therefore, no margin of safety will be reduced.

SE No.: 92-104

Source Document: PAP-1919, Rev. 1

#### Description of Change

This evaluation examines changes to PAP-1919, "Fire Brigade Stations and Equipment". The changes made were administrative in nature.

#### Summary

- I. No. All changes made were found to be consistent with the fire protection requirements of the USAR. No plant systems or components will be affected. Therefore, the probability of an occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR is not increased.
- II. No. All changes made to this procedure are consistent with the fire protection requirements of the USAR. There is not impact upon any plant system or component. Therefore, the possibility of creating an accident or malfunction different from any previously evaluated in the USAR does not exist.
- III. No. The Fire Protection Program is referenced under Sections 6.5.1.6 N, 6.5.2.8 E, and 6.8.1 H of the Technical Specifications. All changes made in this procedure are consistent with the Technical Specifications and the USAR. Therefore, the margin of safety will be reduced.

SE No.: 92-105

Source Document: PAP-0802, Rev. 4, TC-1

### Description of Change

This evaluation examines changes to PAP-0802, "Control of Special Nuclear Material". Changes made include limitations on fire protection and replacing criticality controls for the new fuel vaults with geometric constraints on storage.

### Summary

- I. No. This change incorporates the criticality controls imposed by CR 91-116 and PY-CEI/NRR-1387L, exemption request from 10CFR 70.24. The NRC's Safety Evaluation Report on the exemption states the proposed storage configuration of alternate rows and columns eliminates the possibility of a criticality accident, regardless of the presence of moderation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change limits the allowable storage rack locations in the new fuel vault. Since no physical changes to equipment are involved and no change to equipment operating methods are involved, no new malfunctions are created. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change only involves the new fuel vaults, no irradiated fuel is involved, and the bases for Technical Specification 3/4.7.7 is unchanged. Fuel storage criticality concerns described in Technical Specification 5.6.2 are limited to spent fuel storage racks. Therefore, no margin of safety will be reduced.

SE No.: 92-106

Source Document: NR 92-S-234, Rev. 0

### Description of Change

This evaluation analyzes the justification for use of a welding procedure on Residual Heat Removal (RHR-E12) valve 1E12-F048A that was not qualified for the application to an ASME component.

### Summary

- I. No. Since impact testing per ASME NC-2300 and NC-2400 is not required for this application, use of the techniques given in either weld procedure would have produced similar results. However, since Welding Procedure Specification 1.1.2-001 was not qualified with Post Weld Heat Treatment (PWHT), there is no proof (as normally demonstrated by the supporting Procedure Qualification Record, PQR), the procedure will provide the required yield and tensile strengths. Since Perry procured the welding consumables to maintain yield and tensile strength requirements with up to five times more PWHT time than that of the actual repair, that becomes the technical justification in lieu of the PQR. Therefore, the weld complies with ASME Section III requirement. Accident analysis is not affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR is not increased.
- II. No. As stated above, integrity of the valve is assured. Welding performed has been determined to meet ASME Section III requirements. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Integrity of valve 1E12-F048A is not impacted, thus the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-107

Source Document: IOI-9, Rev. 4, TC-9

### Description of Change

This evaluation examines changes to IOI-9, "Refueling". Changes made include deleting the requirements to install the Refueling Operation Atmospheric Radiation Monitor (D17-K650) and the Unit 1 Portable Drywell Radiation Monitor (1D21-N340) during reactor disassembly, manipulation of a limited number of irradiated fuel assemblies (less than 10) and reactor reassembly.

### Summary

- I. No. Compensatory actions have been taken to ensure that personnel are not exposed to significant levels of radiation during movement of irradiated reactor components or irradiated fuel. These activities are considered to be equivalent to the USAR requirements for these radiation monitors. These radiation monitors have no affect on the mitigation of evaluated accidents. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. As stated above the compensatory measures for detecting and alerting personnel to radiological hazards are considered equivalent. The refueling-type accidents contained in USAR Chapter 15 are not impacted. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The D17-K650 and 1D21-N340 radiation monitors are described in the Technical Specifications. These monitors do not provide any safety function for the plant but do provide for the safety of plant personnel. The compensatory measures described above are equivalent to those described in the USAR. Therefore, no margin of safety is affected.

SE No.: 92-108

Source Document: IOI-9, Rev. 4, TC-10

#### Description of Change

This evaluation analyzes a change to IOI-9, "Refueling". Specifically, the change will permit fuel movement without the installation of the refueling shield.

#### Summary

- I. No. The refueling shield is used to minimize personnel exposure in the drywell following a postulated fuel bundle drop accident. Compensatory actions will be in place to prevent personnel from entering the drywell during fuel movements. There is no impact upon the fuel bundle drop accident nor is there any impact upon any fuel handling equipment. Therefore, the probability of occurrence or the consequences of any accident or malfunction of equipment previously evaluated is not increased.
- II. No. Compensatory actions will be taken to reduce personnel exposure. Fuel handling accident analyses will not be impacted. Therefore, the possibility of creating an accident or malfunction of a different type does not exist.
- III. No. Technical Specification 3/4.9.6 regarding refueling has not been impacted. Fuel handling accident analyses will not be impacted. Control of personnel exposures is maintained. Hence, no margin of safety will be reduced.



SE No.: 92-109

Source Document: DCN 3880, Rev. 0

Description of Change

This evaluation analyzes revising P&ID 808-314, Functional Control Diagram for the Reactor Core Isolation Cooling (E51) System, to clarify design information based on General Electric Drawing Reconciliation Program.

Summary

- I. No. This editorial change does not modify E51 System performance or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is editorial. No system or component functions have been altered. Therefore, no margin of safety will be reduced.

SE No.: 92-111

Source Document: PAP-0101, Rev. 5, TC-4

Description of Change

This evaluation examines changes to PAP-0101, "Perry Organization". Changes were made to update responsibilities for both design and system engineering for all plant computers.

Summary

- I. No. This change is strictly administrative and does not alter any plant system, structure, or component. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is consistent with Section 6, Administrative Controls, of the Technical Specifications. There is no effect upon any margin of safety as defined in the bases for Technical Specifications.

SE No.: 92-112

Source Document: USAR CR 92-037

### Description of Change

This evaluation analyzes the removal of the 1E mild and safety-related mechanical equipment formats from the Auditable File Package (AFP) and the equipment qualification equipment list (EQEL) as described in USAR Section 3.11. The 1E mild and safety-related mechanical equipment data is not being removed from the program, it is just being incorporated into USAR Section 3.10.4.

### Summary

- I. No. This change is related only to how equipment qualification is being documented. The requirements of 10CFR50.49 are still satisfied. There are no changes to the qualification of any plant equipment. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. This change is related only to the documentation of qualification and not to the actual qualification. Plant equipment's function and operation are not affected. Therefore, the possibility of creating an accident or malfunction of a different type does not exist.
- III. No. No plant equipment is affected. This change is related only to how qualification is documented. Hence, no margin of safety will be reduced.

SE No.: 92-113

Source Document: DCN 3792, Rev. 0

Description of Change

This evaluation analyzes an editorial revision to P&ID 302-705, Low Pressure Core Spray (E21) System, to correctly describe the Automatic Depressurization System (ADS) permissive logic associated with pressure switches N652 and N653 as "ADS Division I" in lieu of "ADS Channel A."

Summary

- I. No. This editorial change does not modify E21 System performance or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is editorial in nature. No system or component function has been altered. Therefore, no margin of safety will be reduced.

SE No.: 92-115

Source Document: DCN 3803, Rev. 0

Description of Change

This evaluation analyzes editorial revisions to various drawings associated with the Leak Detection (E31) System and the Main Steam Isolation Valve Leakage Control (E32) System. The information is based on the General Electric Drawing Reconciliation Program.

Summary

- I. No. This editorial change does not modify any E31 or E32 System performance or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is editorial. No system or component functions have been altered. Therefore, no margin of safety will be reduced.

SE No.: 92-116

Source Document: DCP 91-260, Rev. 0

### Description of Change

This design change provides the Intermediate Building Ventilation (M33) System's supply fan freeze protection circuitry with bypass switches to allow for operation with two out of three heating coils during low load winter conditions.

### Summary

- I. No. This design change will enhance the M33 System's freeze protection operation by allowing one coil to be valved out to provide additional building heating water velocity to the remaining supply fan heating coils. The failure of the M33 supply fan freeze protection circuitry will not adversely affect any system required for plant safe shutdown. M33 is not depended upon to perform any accident mitigation function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The design function and operation of the M33 System has not been altered. M33 is not relied upon to provide any accident mitigation function. System failure will not impact any equipment required for safe shutdown. Therefore, the possibility of creating an accident or malfunction of a different type than evaluated does not exist.
- III. No. Design and operation of the M33 System is not included within the bases of the Technical Specifications. Therefore, no margin of safety is impacted.

SE No.: 92-117

Source Document: USAR CR 92-034

Description of Change

This evaluation analyzes incorporation of the TACT 5 computer code into the USAR.

Summary

- I. No. The TACT III code is used for evaluating radiological consequences for Chapter 15 accident events. TACT III has been upgraded to TACT 5 for use with a PC rather than a minicomputer. Other modifications include changes to the format of BASIC preprocessor to aid in the preparation of the input files used to execute the code. The mathematical treatment within the code itself has remained largely unchanged from the earlier version. The TACT code is not used to operate the plant. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The margin of safety applicable to this change is that associated with the radiological exposures of postulated accidents. Since the mathematical treatment within the TACT 5 code is essentially unchanged from the earlier versions of TACT, the calculated dose levels remain the same (all input parameters being identical). Therefore, the margin of safety which exists between the calculated radiological consequences (described in USAR Chapter 15 using the TACT III code) and that identified in 10CFR100 guidelines is not reduced.



SE No.: 92-118

Source Document: USAR CR 92-057

Description of Change

This evaluation analyzes revising USAR Figure 8.3-2; Main One Line Diagram, 480V and Under; to incorporate design changes to the Technical Support Center Uninterruptable Power Supply (TSC/UPS) System Inverters, 1R15-S0001 and 2R15-S001.

Summary

- I. No. This revision reflects the as-built condition of the TSC/UPS for the R15 System. The modification enhances system reliability by providing diesel-backed power to both TSC/UPS in lieu of one as in the original design. This design change does not impact the operation of the ERIS computers, Fire Protection, or the security systems. No equipment required for safe shutdown is affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change does not affect the Class 1E power system as addressed in Technical Specifications. The TSC/UPS provide power to non-safety related ERIS computers, security equipment, and fire protection equipment. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-119

Source Document: DCN 3863, Rev. 0

Description of Change

This evaluation analyzes an editorial revision to P&ID 302-052, Auxiliary Steam (P61) System, to clarify unit boundaries.

Summary

- I. No. This editorial change does not modify P61 System performance or function. Accident analysis is not impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is editorial in nature. No system or component function has been altered. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 92-120, 92-125, 92-126  
Source Document: LL&JED 1-92-060  
LL&JED 1-92-063  
LL&JED 1-92-066

### Description of Change

This evaluation analyzes the installation of an electrical device which will provide a signal to the Main, Reheat, Extraction Drains (N22) System level switch 1N22-N013 to bypass the auto controlling function on drain valve 1N22-F010, due to a ground on the level switch.

### Summary

- I. No. Due to a ground level switch 1N22-N013 is misoperating causing drain valve 1N22-F010 to remain open when it should be closed. By installation of a jumper, all valve control logic will remain functional with the exception of valve operation due to high drain pot level. Operation with a high drain pot level can be mitigated by other system automatic functions as well as by manual valve operation. The turbine trips will remain active. The only accidents associated with the N22 System are feedwater and turbine events. However, installation of this jumper will not impact these events. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. No credit is taken for this drain valve to open in any accident scenario. The jumper does not effect any other plant control logic. As stated above, jumpering out this level switch does not increase the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR.
- III. No. The control circuit which is being modified is not mentioned or implied in any Technical Specification bases. Therefore, no margin of safety will be reduced.

SE No.: 92-122

Source Document: DCN 3889, Rev. 0

### Description of Change

This evaluation analyzes an editorial revision to P&ID 208-168, Two Bed Demineralization (P21) System, to reflect the as-built configuration for the OP21-C0010A & B Regenerant Waste Transfer Pumps.

### Summary

- I. No. Due to susceptibility to corrosion, the original pumps were replaced with pumps from a different manufacturer which were corrosion resistant. However, all of the associated P21 drawings were not updated to reflect the pump operating data. This change revises the P&ID to reflect the current operating data. The change does not affect the function or operation of the P21 System. Failures associated with these pumps are not initiating events to the accidents analyzed in the USAR. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The pumps are non-safety and do not supply water to systems important to safety. The changes are considered editorial and do not adversely affect the function or operation of the system. Therefore, the possibility of a different type of accident or malfunction of equipment important to safety is not created.
- III. No. The make-up water systems are not addressed by Technical Specifications. In addition, the Technical Specification parameters are not affected by the P&ID changes. Therefore, there is no reduction in any margin of safety.

SE No.: 92-124

Source Document: PAP-0507, Rev. 9, TC-3

### Description of Change

This evaluation examines changes to PAP-0507, "Preparation, Review and Approval of Instructions". Changes made include the approvals required for quality and code instructions, the responsibilities for preparation and review of several instruction types, and to delete the approval by the General Manager of certain security instructions.

### Summary

- I. No. This is an administrative change. The documents developed as a result of this procedure will be prepared and reviewed by personnel qualified in the subject matter. The affected Instrument Control Instructions and Instrument Maintenance Instructions which cover computer hardware and software and will become the responsibility of the Performance Engineering (PES) Manager. The PES Manager's qualifications requirements are equivalent to that of a Technical Manager (ANSI definition). Likewise the Instrument and Control Manager qualifications requirements are equivalent to the Maintenance Manager (ANSI definition). Upon review of the ANSI qualification requirements, the Technical Manager possesses a higher level of experience than the Maintenance Manager. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment in the USAR is not increased.
- II. No. See Item I above.
- III. No. This is an administrative change. It is not covered in the bases of the Technical Specifications. The change is in compliance with administrative requirements of Section 6 of the Technical Specifications. Therefore, no margin of safety will be reduced.

SE No.: 92-127

Source Document: MFI 1-92-067

### Description of Change

This evaluation analyzes installation of a Mechanical Foreign Item (MFI) to provide temporary air lines to cross-connect the Unit 1 Service Air (P51) System to the Unit 2 Service Air System.

### Summary

- I. No. The P51 System is designed for cross-connection of the Unit 1 and 2 air distribution systems. This MFI is an alternate means of cross-connecting which will permit the reworking of leaking valves. Failure of the P51 System will not compromise any safety-related system and will not prevent safe reactor shutdown. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Devices supplied with air from the P51 System are designed for the fail-safe mode and do not require continuous air supply under emergency or abnormal conditions. All pneumatically operated valves required for safe shutdown assume the safe position following a loss of air pressure. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The service air distribution systems are not described in Technical Specifications. Therefore, no margin of safety will be reduced.

SE No.: 92-128

Source Document: SCR 1-92-1081 through 1-92-1084

### Description of Change

This evaluation analyzes several setpoint changes to the Rod Control Information (C11) System. These changes are related to the Low Pressure Set Point (LPSP) and High Pressure Set Point (HPSP) functions. When the thermal power is less than or equal to the LPSP, the Rod Pattern Control System (RPCS) functions as the rod pattern controller; when the thermal power is above the LPSP the controller functions as the rod withdrawal limiter.

### Summary

- I. No. The LPSP and HPSP functions are being revised per the evaluation of CR 92-083. This CR revealed that associated transmitter pressure head corrections were not factored into the C11-004 LPSP/HPSP setpoint calculation. The new setpoint methodology from NEDO 31336 was utilized to be consistent with turbine first stage bypass pressure setpoint calculations which were endorsed by the NRC in their approval of Technical Specification Amendment No. 29. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. Operability and design requirements for the LPSP/HPSP function described in Technical Specification have not changed. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.



SE No.: 92-129

Source Document: DCN 3943, Rev. 0

Description of Change

This evaluation analyzes an editorial revision to P&IDs 302-341 and 342, Main Steam Isolation Valve Leakage control (E32), which includes adding test connection designations, correcting a drafting error, and adding a reference to the General Electric E32 design specification.

Summary

- I. No. This editorial change does not modify E32 System performance or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is editorial. No system or component function has been altered. Therefore, no margin of safety will be reduced.

SE No.: 92-130

Source Document: SCR 1-92-0004-T/0005-T, Rev. 0  
SCR 1-92-0005T, Rev. 0  
TAF 81401

### Description of Change

This evaluation analyzes setpoints changes to Loose Parts Monitoring (R63) System Channels 7 and 8. The changes are related to raising the setpoint of Channels 7 and 8 slightly above background noise. The revisions will prevent the Loose Parts Control Room annunciator from constantly alarming.

### Summary

- I. No. The changes in the setpoints for R63-K0670/K0680 will allow the channels to remain on line so that analyses of background noise can be obtained. The R63 System is intended to be used for information purposes only. The reactor operator does not rely on the information provided by the R63 System for the performance of any safety-related action. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Regulatory Guide 1.133 requires that Loose Part sensors be capable of detecting acoustic disturbances. Even with Channels 7 and 8 alarm setpoints increased, Perry still satisfies the Regulatory Guide 1.133. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Regulatory Guide 1.133 requires only two sensors (Perry has ten sensors). Technical Specifications Sections 3/4.3.7.8 allows for the inoperable status of "one or more" Loose Part Channels. Hence, the Regulatory Guide is satisfied. Therefore, the margin of safety will not be reduced.

SE No.: 92-131

Source Document: MFI 1-92-061

### Description of Change

This evaluation analyzes the installation of a Mechanical Foreign Item (MFI) which removes a pipe cap from Residual Heat Removal (RHR-E12) System flush vent valve 1E12-F581 and adds a water hose for draining the RHR line.

### Summary

- I. No. This hose will route water to a floor drain during depressurization of the RHR line. This operation is performed under the RHR System Operating Instruction. The removal of a pipe cap and the addition of a hose is routine in nature for the plant. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The MFI will eliminate the requirement for hose removal after its use. When the hose is not required, i.e., there, but not in use, the 1E12-F581 valve is positioned per the SOI and VLI. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The removal of pipe cap and hose installation is not addressed in Technical Specifications. Therefore, no margin of safety will be reduced.

SE No.: 92-132

Source Document: TXI-0145, Rev. 0

Description of Change

This evaluation analyzes a temporary instruction which permits the cross-tying of the Division 1 and Division 2 buses such that the Division 1 (2) Standby Diesel Generator will supply both divisional buses. This evaluation has resulted in a determination that NRC review is necessary prior to implementation. A request for NRC review will be transmitted under separate cover.

SE No.: 92-133

Source Document: NR 92-N-249, Rev. 0

### Description of Change

This evaluation analyzes the justification for the Use-As-Is disposition of the Liquid Radioactive Waste (G50) System Floor Drain Flatbed Filter with four of its eight channel supports on the upper shell being bent.

### Summary

- I. No. The damage is limited to only four of the eight channels. The four remaining channels are undamaged and uniformly spaced. Hence, the safety function which prevents the upper shell from closing during servicing is still available. The Use-As-Is disposition requires filter verification to ensure that no filter damage occurs during the upper shell lowering operation and that there is no excess out-leakage. If leakage does occur, the water will flow into the filter drip pan and drain back to the liquid radwaste system for reprocessing. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The flatbed filter is not required for safe shutdown of the reactor. Failure of the filter will not impact systems which are used to mitigate accidents analyzed in USAR Chapter 15. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The G50 System is not addressed by Technical Specifications. No Technical Specification parameters are affected by this Use-As-Is disposition. Operation of the filter is not adversely affected. Therefore, no margin of safety will be reduced.

SE No.: 92-134

Source Document: NR 92-S-250, Rev. 0

### Description of Change

This evaluation analyzes the interim Use-As-Is disposition of tube the fittings associated with the Control Rod Hydraulic (C11) System Hydraulic Control Units (HCU) 1C11-D4255, -D3459, and -D3843.

### Summary

- I. No. The HCU's have compression tube fittings installed in the scram valve pilot air headers inlet tubing and the EP126 and EP127 valve diaphragm actuator tubing assemblies. Parker and Swagelok compression tube fittings have been interchanged. This is the fail-safe portion of the C11 System. The fittings for this application are considered to be comparable in strength and configuration. While some of these tubing joints may not result in a "leak free" arrangement, they are considered to be capable of providing a functional joint on air tubing for a limited period of time. Failure of any of these lines will not prevent a scram from occurring if required. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. As stated above, the fittings presently installed are similar in design strength and assembly configuration thus ensuring no gross failure of any of the above described tubing joints. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This evaluation is limited to fail-safe portions of the C11 System. In the highly improbable occurrence of gross tube joint failure, reactor scram would result. Therefore, no margin of safety will be reduced.

SE No.: 92-135

Source Document: DCP 84-052, Rev. 0  
DCP 84-052A/B/C/D/E, Rev. 0

### Description of Change

This design change installs time delay relays in the trip circuit of tie breakers EF1B13, F1C17, F1A17, F1F17, F1G10, and EF1C13 to provide automatic features for live bus transfer. This change eliminates the need to remove the control circuit fuses. The safety of the personnel operating the tie breaker is increased by eliminating the need to remove the fuses in the vicinity of energized bus work.

### Summary

- I. No. These changes maintain the reliability of the circuits involved and have no adverse affect on the overall operation of the tie breakers. The operation of the tie breaker during response to plant accident conditions with the addition of the automatic feature has not changed. Therefore, a radiological release in any way. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. As stated above, this design change installs time delay relays in tie breaker trip circuitry to increase personnel safety and reliability of operation during administratively controlled live bus transfers. The newly added relays, where applicable, are safety related, Class 1E, as documented by Equipment Qualification Reports. These types of relays have been used throughout the plant and have been proven to be satisfactory with no known history of failure. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The operability of the tie breaker is not effected by the implementation of this design change. Since this modification allows for a live transfer of all energized loads downstream of the individual unit substations, the requirements of AC power availability as demanded by Technical Specification 3/4.8, is not compromised. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.



SE No.: 92-136

Source Document: DCP 87-035, Rev. 3

Description of Change

This design change installs a control switch (SS-66), indication lights, and interlocks for the caustic regeneration step valve 1N24-F657 on control panel 1H51-P013 for the Condensate Demineralizer (N24) System.

Summary

- I. No. The ability of the caustic regeneration step valve to perform its function will not be impaired. The circuit reliability remains unchanged and the N24 System as described in the USAR will not be affected. The control switch has open contacts in the spring return to mid-position (in auto) which will permit an automatic valve closure and avoid a misalignment of the system if the caustic injection is not selected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The design change does not compromise the function or operation of the N24 System. The material and the installation methods used for this change is the same as the original design. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The reliability of N24 System operation will remain unchanged. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-137

Source Document: DCP 91-239, Rev. 0

Description of Change

This design change replaces Units 1 and 2, Division 1 and 2 batteries (1/2R42-S002 and 1/2R42-S003) with new batteries manufactured after 1983. Batteries manufactured prior to 1983 have experienced corrosion defects which cause battery positive post seals to crack.

Summary

- I. No. The new batteries are designed with a slide-lock seal that will eliminate positive post corrosion problems. Aside from the slide-lock seal design feature, the new batteries are identical to the existing batteries in performance, capacity, service life as well as their environmental and seismic qualifications. The battery capacity required to supply DC power to Class 1E equipment during a station black-out remains the same. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This product improvement will enhance the reliability of the divisional batteries, and does not impact the response or operation of associated divisional equipment. Therefore, the possibility creating of an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. As stated above, the reliability and operability of the divisional DC system will be enhanced by this battery replacement. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-138

Source Document: NR 92-N-245, Rev. 0

### Description of Change

This evaluation analyzes the Use-As-Is disposition which permits the temporary use of a one-inch Instrument Air (P52) System line with an axial split. The line supplies air to the Service Water Pumphouse.

### Summary

- I. No. The pipe as described above has incurred an axial split and is leaking air. However, the leak is not large enough to interrupt supply to the Service Water Pumphouse. The Use-As-Is allows the P52 System to continue to supply instrument air until the rework is performed. The complete failure of the line would not result in a Loss Instrument Air transient as described in USAR Section 15.2.10. Loss of air to the pumphouse would not impact the operability of the Service Water (SW) System since the SW support activities that involve the use of air can be performed manually. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The continued use of the one-inch line in its non-conforming condition does not introduce any failure not already considered in the USAR. The only potential failure involved is the further splitting of the pipe and a resultant loss of air to the Service Water Pumphouse. This would not impact the SW System as stated above. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The Instrument Air and Service Water Systems are not addressed in the bases of the Technical Specifications. Therefore, no margin of safety will be reduced.

SE No.: 92-139

Source Document: DCN 3769, Rev. 0

Description of Change

This evaluation analyzes an editorial revision to P&ID 302-871 and 302-872, Control Rod Hydraulic (C11) System, to provide clarification of the references based on General Electric Drawing Reconciliation Program.

Summary

- I. No. This editorial change does not modify Control Rod Hydraulic System performance or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is editorial in nature. No system or component function has been altered. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-140

Source Document: PSTG, Rev. 2, TC-1

### Description of Change

This evaluation analyzes a change to the Perry Specific Technical Guidelines (PSTG) which deletes the use of the Condensate System as a means of alternate injection.

### Summary

- I. No. The Emergency Procedure Guidelines (EPG) is the basis for the PSTG. The EPG's are reviewed and approved by the NRC. The EPG's do not require a set number of systems to be used for alternate injection nor does it require what systems should be considered for this function. Removal of this PSTG function has no impact upon the design, function or operation of the Condensate System. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. The deletion of the Condensate System as an alternate injection system does not impact the design or operation of the Condensate System. Therefore, the possibility of creating an accident or malfunction of a different type does not exist.
- III. No. The Condensate System is not described in the Technical Specifications. The design, function, or operation of the Condensate System has not been affected. Hence, no margin of safety will be reduced.

SE No.: 92-141

Source Document: USAR CR 92-077

Description of Change

This evaluation analyzes revising the USAR to incorporate all procedures into the Operations Manual.

Summary

- I. No. This change incorporates all plant procedures and instructions into the Operations Manual hierarchy. Material in this change does not change or negatively affect the Operations Manual described in the USAR, Chapter 13.5. Quality Assurance requirements are maintained. The change does not impact the physical plant or accident analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This administrative change does not involve or impact any plant system or equipment. The QA requirements are maintained. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This is an administrative change which has no potential to affect plant operation per Technical Specifications. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-142

Source Document: DCN 3958, Rev. 0

Description of Change

This evaluation analyzes an editorial revision to P&ID 302-631, Reactor Core Isolation Cooling (E51) System, to provide clarification of the references based on General Electric Drawing Reconciliation Program.

Summary

- I. No. This editorial change does not modify Reactor Core Isolation Cooling System performance or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is editorial in nature. No system or component function has been altered. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.



SE No.: 92-143

Source Document: USAR CR 92-054

Description of Change

This evaluation analyzes a clarification of USAR Section 9.5.1.2.7 which describes the AC and DC power supplies to the fire protection/detection system.

Summary

- I. No. The existing text is inaccurate in its description of the normal and alternate power supplies associated with the 120 VAC Vital Technical Support Center (TSC) Inverters. This text change will make the USAR description conform to the system design and operation. There is no change to the design of the AC and DC power supplies. There is no change to the Fire Protection System. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. As stated above, no changes in system design, reliability or operation resulted from this change. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The operation of the Fire Protection System or its associated power supplies are not addressed in the Technical Specifications. Since system operation and reliability are not affected by this change, no margin of safety will be reduced.

SE No.: 92-145

Source Document: OM15A Emergency Plan for PNPP, Rev. 10, TC-6

Description of Change

This evaluation analyzes changes made to Revision 10 of OM15A, Emergency Plan for PNPP. The changes are editorial in nature.

Summary

- I. No. The proposed changes are administrative in nature. The effectiveness of the PNPP Emergency Plan has not been decreased per 10CFR50.54(q). The changes do not effect or direct the operations of plant systems, equipment, or components. The changes do not affect previously evaluated accidents. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. These changes are administrative in nature and do not effect or direct the operation, equipment or components. The change does not affect previously evaluated accidents. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-146

Source Document: DCN 3620, Rev. 0  
SCN 372-ISS-2000

### Description of Change

This evaluation analyzes a revision to P&ID 302-242, Service Air System, which adds a note to the drawing. This note will allow plant personnel flexibility in working with the Service Air (P51) System by permitting various types of end connections at the air stations.

### Summary

- I. No. This revision will allow the use of different connections on the service air stations. Failure of the P51 System will not compromise any safety-related system or component and will not prevent safe reactor shutdown. The use of these connections and their potential failure will not impact the Loss of Instrument Air transient described in USAR Section 15.2.10. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. There is no affect on any safety-related equipment. The use of these connections and their potential failure will not impact the Loss of Instrument Air transient described in USAR Section 15.2.10. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Failure of the P51 System will not compromise any safety-related system or component and will not prevent safe reactor shutdown. The change does not alter any information in the Technical Specifications or alter previously described commitments. Therefore, no margin of safety will be reduced.

SE No.: 92-147

Source Document: DCN 3890, Rev. 0

### Description of Change

This evaluation analyzes makes an editorial revision to P&ID 302-691, Standby Liquid Control (C41) System. The revision correctly shows the as-installed and tested configuration of the C41 System.

### Summary

- I. No. This change does not modify C41 System performance or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The drawing change is editorial in nature. No system or component function has been altered. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-148

Source Document: DCN 3965, Rev. 0

Description of Change

This evaluation analyzes an editorial revision to P&ID 320-754, Off Gas (N64) System, to correct MPL numbers.

Summary

- I. No. This revision will change MPL number 1N64-R738A to 1N64-R740A. This is consistent with the information on P&ID 302-752. This change does not modify N64 System performance or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is administrative in nature. No system or component function has been altered. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-149

Source Document: Calculation PRDC-0011  
TAF 81416

### Description of Change

This evaluation analyzes temporarily bypassing the Unit 1, Division 2 battery, 1R42-S003, cell #57 due to physical damage (jar cracking, electrolyte leaking). Calculation PRDC-0011 shows that the 59 cell battery has adequate capacity to provide Division 2 DC load requirements.

### Summary

- I. No. The removal of one cell from the Unit 1, Division 2 battery does not cause a significant impact on battery capacity. The initial voltage reduction will not affect 1R42-S003 operability or capability to provide Division 2 DC load demand and operate Division 2 control devices during an accident. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This temporary condition will not change the 105VDC final voltage of 1R42-S003 required by Technical Specifications/USAR. Unit 1, Division 2 DC System performance and function will not be altered. Accident functions of the Division 2 DC circuits will not be impacted. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. As stated above, Unit 1, Division 2 DC System operability is not impacted. The 59 cell battery will meet Technical Specification requirements. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-151

Source Document: DCP 84-040 Rev. 0

Description of Change

This design change provides additional cooling and redundancy to the Radwaste Control Room Ventilation (M48) System. (Reference Safety Evaluation 85-112.)

Summary

- I. No. This change increases the reliability of the M48 System by providing a back-up source of ventilation when the present HVAC unit is out of service. The materials and installation standards applicable to this modification are identical to those of the original design. The M48 System does not impact accident analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The M48 System is non-safety and not required to support safe shutdown or accident mitigation. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.



SE No.: 92-152

Source Document: NR 92-S-261, Rev. 0

Description of Change

This evaluation analyzes the Use-As-Is disposition of the use of a larger than required fuse for the High Pressure Core Spray (HPCS) Water Leg Pump 1E22-C0003.

Summary

- I. No. The installed fuse is larger than the actual measured running current. No known fuse operation for this application has occurred. The Use-As-Is disposition will support pump operability. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. As long as the HPCS Pump is in standby condition, the waterleg pump will run continuously. There is no frequent starting. Valve misalignment could cause the HPCS piping to drain. Should this occur, the waterleg pump would work harder than usual to refill the piping, hence the motor running current may be higher but not greater than the full load amp. HPCS System operability will be maintained. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This disposition does not impact HPCS System operability. Therefore, no margin of safety will be reduced.

SE No.: 92-153

Source Document: DCP 89-010, Rev. 0

Description of Change

This design change installs a loop seal in the overflow line of the Reactor Water Cleanup (RWCU-G36) Filter-Demineralizer Backwash Receiving Tank (BWRT). (Reference Safety Evaluation 91-167.)

Summary

- I. No. This change will have no affect upon the RWCU System's ability to maintain water quality. There will be no impact upon the RWCU System's and Containment Vessel and Drywell Purge (M14) System's ability to establish and maintain containment integrity. Accident analysis will not be impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated is not increased.
- II. No. This change will not alter the function or operation of the RWCU System. Reactor water quality will not be affected. There is no impact upon accident analysis. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Changes made to G33 and the M14 duct work still retain the same functional requirements. The G33 System and M14 System operations will be within Technical Specification requirements. Water Chemistry will not be affected. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-154

Source Document: DCP 85-067, Rev. 0

Description of Change

This design change installs a balancing damper, OM21-F0637, to the Controlled Access Ventilation (M21) System's oil laboratory fume hood exhaust duct. (Reference Safety Evaluation 87-458.)

Summary

- I. No. The M21 System is nonsafety-related. System design flow rates after balancing will continue to meet the original design flow rates. There is no impact upon plant accident and transient analysis. Thus, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The M21 System is not addressed in Technical Specifications. Therefore, no margin of safety will be reduced.

SE No.: 92-155

Source Document: NR 92-S-264, Rev. 0

### Description of Change

This evaluation analyzes the interim Use-As-Is disposition of operating the Standby Diesel Generators (DG) with jacket water temperature instrumentation tubing vibrating.

### Summary

- I. No. The tubing is designed and remains in conformance with ANSI B31.1. The tubing has been inspected and the results indicate that there would be no impact upon tubing integrity. The temperature instrumentation is bypassed during DG emergency operations. Hence, there is no adverse affect upon the DGs. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. As stated above, there is no adverse impact upon the DGs. Accident analysis is not affected. Therefore, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. This change does not adversely impact the design, function, or performance of the DGs. Technical Specification 3/4.8 referring to the reliability of on-site power supplies has not been altered. Therefore, no margin of safety will be reduced.

SE No.: 92-156

Source Document: DCP 87-739, Rev. 7

#### Description of Change

This design change revision alters a previously evaluated modification to the Turbine Building Closed Cooling (TPCC-P44) System which installed in-line strainers to the Reactor Feed Water Booster Pumps (RFBP) 1N27-B007A, B, C, D Motor Coolers. Two of the four lines (B&D) have been modified. It was then determined that in the remaining two lines (A&C) the strainers were no longer needed.

#### Summary

- I. No. The added strainers to the P44 cooling water lines only served to improve reliability of the RFBP's. The strainers are installed in a clean (non-radioactive) system that will (if needed) remove silt or corrosion products from the P44 cooling water. Operation of both systems and of the plant remains unaltered. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change was a preventative maintenance modification. P44 and N27 System operation remains unaffected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. No plant component or system is changed in a manner which would affect Technical Specifications. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-157

Source Document: DCN 3999, Rev. 0

Description of Change

This evaluation analyzes an editorial revision to P&ID's 307-791 and 302-792, Emergency Service Water (ESW-P45) System, to correct a cross reference of an indicator signal from one drawing to another, and eliminate the double referencing of an instrument.

Summary

- I. No. This change does not modify P45 System performance or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The drawing change is editorial in nature. No system or component function has been altered. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-158, 92-161  
Source Document: EDCR 91-7177  
DCP 91-177B/C, Rev. 0

### Description of Change

This evaluation analyzes the design and construction of a Low Level Radioactive Waste Storage and Processing Facility (LLRWSPF). This facility is intended for the processing and the interim (5 year) storage of low level radioactive waste.

### Summary

- I. No. The design construction and use of the LLRWSPF are in compliance with the guidelines contained in Generic Letter (G.L.) 81-38. Complete failure of the facility has been analyzed and will not result in the generation of radiological conditions in excess of the Technical Specification limits or requirements contained in the Generic Letter. The Fire Protection aspects of the facility are in compliance with NFPA 13, NFPA 24, and the Fire Protection Program described in the USAR. No systems required for safe shutdown or required for accident mitigation will be affected by the construction/use or failure of this facility. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. The LLRWSPF's design and function is in compliance with G.L. 81-38. The Fire Protection aspects are in compliance with the Fire Protection Program described in the USAR. Facility failure has been analyzed and is in compliance with existing regulations/guidance. The effects of natural events have been analyzed and the facility is bounded by existing analyses. Safe shutdown or accident mitigation systems will not be impacted. Therefore, the possibility of creating an accident or malfunction of a different type does not exist.
- III. No. The LLRWSPF is not required for safe shutdown or accident mitigation. Failure of the structure or internal equipment will not adversely impact the capability to process/store radioactive waste. Further, failure does not impact accident analysis as described in USAR Chapter 15.7. Administrative controls and the physical design of the LLRWSPF satisfy the criteria described in Technical Specifications 3/4.11.3 "Solid Radwaste Treatment" and 3/4.11.4 "Total Dose". The Fire Protection System (P54) remains in compliance with the requirements of the Fire Protection Program as described in the Technical Specifications and the USAR. Therefore, no margin of safety has been reduced.



SE No.: 92-159, 92-163

Source Document: EDCR 91-7095, Rev 0

### Description of Change

This evaluation analyzes the removal of two temporary sunken barges and the construction of a revetment on the shoreline once the barges are removed. The revetment will enhance shoreline stability.

### Summary

- I. No. The revetment consisting of 1300 feet of sheet pile and armor stone will provide additional shore protection. The vibratory energy of the pile driving operation will not affect the Emergency Service Water Pumphouse (ESWPH), the equipment inside or any yard piping. The construction of this revetment will have no effect on any safety-related equipment or structure nor will it contribute to the initiation of any plant system. Therefore, the probability of occurrence or the consequence of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The revetment will increase the shoreline stability. The vibratory nature of portions of the construction phase will not affect any plant systems due to the distance involved. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The USAR contains a commitment to monitor the shoreline and provide permanent shoreline protection if the stability of the ESWPH is threatened. This revetment project does not alter that commitment. It does increase the protection of the ESWPH. The Technical Specifications do not address the stability of the ESWPH. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 92-162

Source Document: NR 92-N-263, Rev. 0  
DCN 4002, Rev. 0

### Description of Change

This evaluation analyzes the Use-As-Is disposition of several non-conforming valves in the Two Bed Demineralization (P21) and the Mixed Bed Demineralization (P22) Systems. These valves, OP22-F529, OP22-F566, and OP21-F665 have threaded-end connections rather than socket weld end connections.

### Summary

- I. No. The threaded-end connections for the P21 and P22 Systems are permitted by ANSI B31.1. This change does not adversely affect the function or operation of these systems. P21/P22 are nonsafety and do not impact the USAR accident analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The P21/P22 Systems are nonsafety. The valves meet the material and service requirements for the P21 and P22 Systems. The changes do not adversely affect the function or operation of the two systems. No Technical Specifications parameters are affected. Therefore, no margin of safety will be reduced.

SE No.: 92-164

Source Document: DCP 92-180  
SCR 1-92-1194 and 1195

### Description of Change

This design change replaces the motor pinion gearing in the Limitorque operator for the Reactor Core Isolation Cooling (RCIC-E51) System valve 1E51-F0064. This change will increase the torque delivered to the valve ensuring valve operability.

### Summary

- I. No. This valve operator modification will not impact RCIC initiation or the RCIC containment isolation function. Equipment qualification for the valve has not been affected. The Leak Detection System will operate as designed. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Equipment qualification of the isolation valve has not been altered. The RCIC System and the Leak Detection System have not been impacted. Accident analysis has not been affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The isolation valve operator change will have no impact on RCIC operation. Accident analysis is not affected. Therefore, no margin of safety will be reduced.

SE No.: 92-165, 92-188  
Source Document: USAR CR 92-096

Description of Change

This evaluation analyzes an administrative change which incorporates the development of the Perry Specific Technical Guidelines (PSTG) into the USAR.

Summary

- I. No. This is an administrative change. The incorporation of the development of the PSTG into the USAR does not alter the technical analyses or information contained in this USAR. The PSTG is derived from the Emergency Procedure Guidelines (EPG) which have been reviewed and approved by the NRC. Accident analysis has not been affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR is not changed.
- II. No. This is an administrative change. The PSTG is derived from generic guidance reviewed and approved by the NRC. No technical information contained in the USAR has been affected. Therefore, the possibility of creating an accident or malfunction of equipment important to safety of a type different than previously evaluated does not exist.
- III. No. The PSTG is derived from generic guidance reviewed and approved by the NRC. The incorporation of the PSTG into the USAR does not alter any of the technical information contained in the USAR. Therefore, no margin of safety will be reduced.

SE No.: 92-166

Source Document: DCN 4003, Rev. 0

Description of Change

This drawing change makes an editorial revision to P&ID 302-752, Off Gas (N64) System, to properly show the electrical line-up and match circle designations to recorder annunciator logic.

Summary

- I. No. This change is editorial only. The N64 System will not be impacted. Accident analysis is not affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is editorial. There is no impact upon the N64 System. Therefore, no margin of safety will be reduced.

SE No.: 92-176

Source Document: DCN 3942, Rev. 0

### Description of Change

This drawing change evaluates the material substitution that provides for use of an alternate valve stem material, ASTM A 276 type 410 (condition H), in lieu of the present ASTM A 479 type 40 (Q&T) stem material for various High Pressure Core Spray (HPCS-E22) System valves.

### Summary

- I. No. The substitute valve stem material has chemical and hardness properties that are identical to the original material. In addition, the tensile strength of the alternate stem material is 10,000 psi greater than the original material. Based on the above considerations use of the substitute material will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR.
- II. No. The substitute material is essentially equivalent to the original stem material. The function of the E22 System has not been affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Valve function/response to an accident or transient with the alternate valve stem material is identical to that for the original stem material. Therefore, no margin of safety will be reduced.

SE No.: 92-177

Source Document: USAR CR 92-082

### Description of Change

This evaluation analyzes a revision to the USAR which clarifies the conditions when the Refuel Floor Portable Area Radiation Monitor, 1D21-K341, will be physically interlocked to the Drywell/Containment Evacuation Alarms. In addition, the USAR will be revised to delete reference of an electrical interlock between the Refuel Floor Portable Airborne Radiation Monitor, D17-K650, and the above stated evacuation alarms.

### Summary

- I. No. The D21-K341 design basis is personnel protection during a postulated fuel bundle drop. This USAR change does not alter this requirement. The D17-K650 will be disconnected during activities which result in excessive background radiation. The excessive background radiation masks the actual airborne radiation levels which the monitor is designed to measure. Disconnecting the input to the Containment Evacuation Alarm will prevent false alarm conditions. The monitor will still provide local indication and alarm features in the refuel area. Additional portable airborne monitors will be provided by Health Physics to continuously monitoring radiological conditions to ensure adequate personnel protection is provided. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. Operation of safety-related systems is not effected by this change. This change will ensure that Containment/Drywell Evacuation Alarms will occur when valid radiation levels are present. Local alarm and indication functions of this equipment will be retained along with the use of auxiliary monitoring equipment when the monitors are disconnected from the evacuation alarms. Therefore, no margin of safety will be reduced.



SE No.: 92-180

Source Document: USAR CR 92-101

### Description of Change

This evaluation analyzes the revision of the QA Program description in the USAR, "Quality Assurance During the Construction Phase". A paragraph is added to the text stating that quality assurance for Unit 2 maintenance/preservation activities are administered under the Operations QA Program for Unit 1 as described in the USAR. This provision is in effect while Unit 2 is in deferred construction status.

### Summary

- I. No. The result of this change will be temporary suspension of the CNQAP and establishment of QA Plan Appendix O "Perry Unit 2 Construction". This change does not involve or impact the design, operation, or accident analysis of Unit 1. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change applies to Perry Unit 2 and has no impact on the Technical Specifications for Unit 1 or Unit 1 plant operations. Therefore, no margin of safety will be reduced.

SE No.: 92-181

Source Document: DCN 3717, Rev. 0

### Description of Change

This drawing change revises Drawing E 015-044, "Reactor Refueling Floor-Laydown Study" which is a study to determine the adequacy of storage space for major reactor components during the refueling operation. The change will reflect additional items weighing over 500 pounds.

### Summary

- I. No. This change reflects the as-built condition of the Reactor Building Refueling Floor and is not making any design changes. The storage location of equipment and tools used for fuel handling does not affect the operation of the plant. Structural adequacy for the loads in question were analyzed in the original evaluations. This drawing change does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR.
- II. No. The storage locations of the equipment on the refuel floor do not affect the operation of the plant and do not alter the operability or function of any equipment in the area. The actual equipment used during refuel operations is not changed, only the storage location of the equipment when not in use. The structure has been shown to be adequate for these loads. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The equipment storage locations have been arranged such that no required operational parameters are impacted. The structure has been shown to be adequate for the loads in question. Therefore, no margin of safety will be reduced.

SE No.: 92-189

Source Document: PAP-0101, Rev. 5, TC-5

#### Description of Change

This evaluation analyzes changes to PAP-0101, "Perry Organization". Changes were made to update responsibilities for three organizations. Scheduling and tracking of surveillance testing and plant monitoring activities will shift to the Outage Planning and Systems Engineering Sections, respectively. Design responsibilities for motor operated valves will be transferred to the Systems Engineering Section.

#### Summary

- I. No. This change is administrative and does not alter any plant system, structure or component. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is consistent with Section 6, Administrative Controls, of the Technical Specifications. There is no effect upon the physical plant. Therefore, no margin of safety will be reduced.

SE No.: 92-194

Source Document: USAR CR 92-123

Description of Change

This evaluation analyzes an editorial revision to USAR Figure 9.2-9 Sheet 2 to reflect match mark corrections shown on P&ID 302-162, Rev. 5, Makeup Water Pretreatment (P20) System.

Summary

- I. No. This change is editorial and does not effect plant operation. Accident analysis has not been affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is editorial and does not alter the plant or impact any USAR analyses. Therefore, no margin of safety will be reduced.

SE No.: 93-014

Source Document: USAR CR 92-124

### Description of Change

This evaluation analyzes an administrative change to the USAR to correct an inconsistency in the Suppression Pool high water level value.

### Summary

- I. No. This is an administrative change. Suppression Pool high water level value was not consistently stated throughout the USAR. The USAR is being changed to consistently list the correct value. This change does not affect the physical plant. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change is editorial in nature and simply makes various sections in the USAR agree with each other. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change is an editorial change to the USAR. The level value is consistent with the value stated in Technical Specification 3/4.6.3. Therefore, no margin of safety will be reduced.

SE No.: 93-020

Source Document: USAR CR 93-003

### Description of Change

This evaluation analyzes an editorial change to USAR Table 3.2-1 regarding the data associated with the Standby Liquid Control System and the Standby Liquid Control Transfer System. The change clarifies tabulated data incorporated through USAR CR 90-065 which added Standby Liquid Control Transfer System data.

### Summary

- I. No. This change is editorial. It merely reorganizes the presentation of existing technical information. The change does not alter the plant nor does it impact accident analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. This change is editorial only. The Standby Liquid Control System and the Standby Liquid Control Transfer System have not been altered in any way. Accident analysis and plant radiological analyses have not been impacted. Hence, creating a different type of accident or malfunction is not probable.
- III. No. This change is editorial in nature. It merely reorganizes the presentation of existing technical information. The change does not alter the Standby Liquid Control System or the Standby Liquid Control Transfer System designs/functions. Accident analysis and plant radiological analyses have not been impacted. Therefore, no margin of safety will be reduced.

SE No.: 93-022

Source Document: USAR CR 93-007

### Description of Change

This evaluation analyzes updating USAR Figures 13.1-1 and 13.1-2 to reflect the new Centerior organization.

### Summary

- I. No. This change updates the USAR to reflect the current off-site corporate organization. The change complies with the requirements delineated in Regulatory Guide 1.70 and the Standard Revision Plan. The change is consistent with Technical Specifications 6.5. There are no changes to the Perry (CEI) site organization. Plant operation will not be impacted. Accident analysis and plant radiological analyses have not been altered. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. The change updates the off-site organization. There are no changes to the CEI on-site organization. Plant operations will not be impacted. This change does not alter the plant in any way. As stated above, accident analysis and radiological analyses will not be affected. Therefore, the creation of a new type of accident or malfunction of equipment is not probable.
- III. No. The change updates the off-site organization. There are no changes to the CEI on-site organization. There are no changes to the plant, to the accident analysis, or to the radiological analyses. Therefore, no margin of safety has been reduced.



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Description of Change

The evaluation analyzes administratively updating several sections of the USAR. Briefly, Tables 1.71-1 and 1.7-2 will be updated to indicate current drawing revision letters and dates, and corrections (typo's, inclusion of drawing number, inclusion of section references, etc.) will be made to several titleblocks and figures/drawings.

Summary

- I. No. This change is administrative only. It does not change the plant as described in the USAR. It does not alter any plant drawing. This change will not impact accident analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. This change is administrative only. It does not change the plant. This change does not impact accident analysis. It will not create an accident or malfunction of equipment different than that which has already been evaluated.
- III. No. This change does not alter the plant nor does it affect any analysis described in the USAR. Therefore, no margin of safety will be reduced.