



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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Dalwyn R. Davidson  
VICE PRESIDENT  
SYSTEM ENGINEERING AND CONSTRUCTION

June 8, 1982

Mr. A. Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Schwencer:

Perry Nuclear Power Plant  
Docket Nos. 50-440; 50-441  
SER Confirmatory Issues -  
Containment Systems

This letter provides revised responses to Containment Systems Branch Questions 480.48 and TMI Action Item II.E.4.2. These items were discussed in our May 21, 1982, meeting with the NRC Containment Systems Branch reviewer.

It is expected that these revised responses which will be incorporated in a future FSAR amendment, should resolve these issues.

Very truly yours,

Dalwyn R. Davidson  
Vice President  
System Engineering and Construction

DRD: mb

cc: Jay Silberg, Esq.  
John Stefano  
Max Gildner

13001

480.48

With regard to your containment leakage testing program, we will require that:

- a) all isolation valves listed in Table 6.2-40 be Type C tested;
- b) the feedwater lines(items 9 and 10) be vented and drained for Type C test, tested with air and leakage included in 0.60 La; and
- c) HPCS pump discharge to RPV(item 32), and LPCS pump discharge to RPV(item 35) be tested with air and leakage included in 0.60 La.

Response

- a) All containment isolation valves listed in Table 6.2-40 will be type C tested, except the isolation valves for instrument lines which penetrate the containment and conform to the requirements at Regulatory Guide 1.11. Isolation valves, pressurized by a water seal system, will be Type C tested with water and the leakage rate, consistent with the Type C test acceptance criteria in 10 CFR 50, Appendix J.

Examples of such lines are discussed in b) and c) below and lines that terminate below the water level of the suppression pool. Sufficient pool inventory is available to maintain a 30 day pressure at 1.10 Pa. The piping up to the isolation valve is seismic Category I, safety class 2. Missile and pipe whip are not concerns for this piping.

- b) The feedwater lines are Type C tested with water and the leakage is not included in the 0.60 La. This is consistent with 10 CFR 50 Appendix J acceptance criteria since a dedicated Feedwater leakage control system is provided. Refer to response to 480.35(NOTE 10 to Table 6.2-33) and new FSAR Section 6.9.

- c) HPCS and LPCS and LPCI pump discharge lines to the reactor vessel will be Type C tested with air and the largest leakage included in 0.60 La. Consistent with 10 CFR 50, Appendix J acceptance criteria, hydrostatic testing may be performed if a liquid inventory to maintain a water seal is demonstrated, assuming single failure of any active component.

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Item II.E.4.2

Containment Isolation Dependability

REQUIREMENT

1. Containment isolation system designs shall comply with the recommendations of Standard Review Plan Section 6.2.4 (i.e., that there be diversity in the parameters sensed for the initiation of containment isolation).
2. All plant personnel shall give careful consideration to the definition of essential and nonessential systems; identify each system determined to be essential; identify each system determined to be nonessential; describe the basis for selection of each essential system; modify their containment isolation designs accordingly; and report the results of the reevaluation to the NRC.
3. All nonessential systems shall be automatically isolated by the containment isolation signal.
4. The design of control systems for automatic containment isolation valves shall be such that resetting the isolation signal will not result in the automatic reopening of containment isolation valves. Reopening of containment isolation valves shall require deliberate operator action.
5. The containment setpoint pressure that initiates containment isolation for nonessential penetrations must be reduced to the minimum compatible with normal operating conditions.
6. Containment purge valves that do not satisfy the operability criteria set forth in Branch Technical Position CSB 6-4 or the Staff Interim Position of October 23, 1979, must be sealed closed as defined in SRP 6.2.4, Item II.3.f during operational conditions 1, 2, 3 and 4. Furthermore, these valves must be verified to be closed at least every 31 days.
7. Containment purge and vent isolation valves must close on a high radiation signal.

RESPONSE

The containment isolation system for PNPP has been reviewed in accordance with NUREG-0737. The results of the review are as follows:

1. In order to evaluate the adequacy of the PNPP containment isolation system, FSAR Table 6.2-32 "Containment Isolation Valve Summary" was reviewed for accuracy, completeness and consistency with the NRC Standard Review Plan Section 6.2.4. The most significant changes appear in the columns labeled "Essential (TMI)" and "Isolation Signal."

2. Because the definition of essential and non-essential systems has been altered since the TMI-2 incident, the containment penetrations were re-evaluated as to their importance in post-accident situations. This re-evaluation was done using Table 6.2-32 (marked-up copy attached). This table provides an assessment of the PNPP systems which can be considered "Essential" or "Non-Essential" for isolation conditions consistent with NUREG-0578, Requirement 2.1.4. As used in this assessment, those systems identified as essential are ESF systems, are regarded as indispensable or are back-up systems in the event of a loss-of-coolant accident. The non-essential systems have been judged to be not required in loss-of-coolant accident situations. In addition, it may be desirable to utilize a non-essential system to mitigate the consequences of an accident. For such circumstances, these systems have been indicated as Essential(\*) but they are non-ESF systems which isolate on a containment isolation signal.
3. All non-essential systems and non-ESF/Essential(\*) systems isolate on a containment isolation signal.
4. Systems, once isolated, should be capable of being quickly returned to service as the need arises. The review of the FSAR Table 6.2-32 also included examining the effect of resetting the containment isolation signal.

All automatic isolation valves, with the possible exception of the main steam isolation valves, will remain in the "as is" position when the containment isolation signal(s) is reset.

After further investigation into the control function of the main steam isolation valves, modification(s), if required, will be made to keep the valve closed after resetting the containment isolation signal. Also, those valves that are identified with a RM \* in Table 6.2-32, may require a separate remote manual switch in the control room.

5. An evaluation is underway to determine the minimum containment pressure setpoint. This setpoint pressure will be the minimum compatibility with normal operating conditions and will be reflected in technical specification.
6. The containment purge system is designed to achieve the objectives stated in Branch Technical Position CSB 6-4. Purge system containment isolation valves are capable of isolating containment within 5 seconds. The containment purge system is described in FSAR Section 6.5.1.
7. PNPP containment purge and vent valves are to close on high radiation signals. Those that do not isolate on high radiation signals are to be "sealed closed" valves.

Table 6.7.37  
(1)(2)[illegible]



TABLE 6.2-32 (Continued)

Penetration Number (3) Unit 2	GC/Reg. Guide	System Name	Fluid	Line Size (in.)	ESF (A) Yes	Fig. 6.2-40 Atr. No.	Spec. and Yellow Number	Type C Type Lap (6)	Valve Type	Actuation Mode P, L, S, C	Valve Position Status Open, Closed, Fail	Isolation Signal (B)	Close Time (s)	Per Source (10)	Flow Dir.
P116 ✓	GC37	Air Supply to ADB Accumulator	Air	1	Yes	33	P117023A P117023A	Yes Yes	NA 16" x 9"	E M E M	OP OP	CL CL	AI AI	1	In
P117	GC37	Nitrogen Supply to Control Rod Drive	Nitrogen	2	No	61	P117002 P117028	Yes Yes	C 20" NA	E M P	CL CL	CL CL	AI -	1	In
P118 ✓	GC36	ROR Heat Exchanger Vent to Suppression Pool	Noncondens.	1	Yes	65	P117023A	0	No 12" x 9"	E M	CL	CL	AI	1	In
P119	GC36	Containment Leak Rate Test P1	Noncondens.	1	Yes	65	P117023A	1	No NA	P	CL	CL	-	-	In
P120	GC36	Containment Leak Rate Test P1	Cont. Atmos.	1/2	No	35	Spec. Flange Spec. Flange	0	Yes NA	-	-	-	-	-	Out
P121 ✓	GC35	Feedwater A, BIR, and R1C Return to Reactor Pressure Vessel	Water	20	Yes	35(b)	Spec. Flange Spec. Flange	1	Yes NA	-	-	-	-	-	In
P122 ✓	GC35	Feedwater A, BIR, and R1C Return to Reactor Pressure Vessel	Water	20	Yes	35(b)	Spec. Flange Spec. Flange	1	Yes NA	-	-	-	-	-	In
P123 ✓	GC35	Main Steam Line C	Steam	24	Yes	1(a)	R117028C R117028C	0	Yes NA	A SP A SP	OP OP	CL CL	AI AI	1	Out
P124 ✓	GC35	R1C Pump Discharge and ROR Head Spray	Water	6	Yes	5	R117005 R117005	0	Yes NA	-	-	-	-	-	In
P125 ✓	GC35	Main Steam Line A	Steam	24	Yes	1(a)	R117028A R117028A	0	Yes NA	A SP A SP	OP OP	CL CL	AI AI	1	Out
P126 ✓	GC35	R1C Pump Suction	Water	6	Yes	46	G117001 G117001	1	Yes NA	E M E M	OP OP	CL CL	AI AI	1	Out
P127 ✓	GC35	R1C Line from Regenerative Heat Exchanger to Feedwater	Water	6	Yes	46	G117001 G117001	1	Yes NA	E M E M	OP OP	CL CL	AI AI	1	Out

TABLE 6.2-32 (Contd.)



TABLE 6.2-32 (Continued)

[illegible]



TABLE 6.2-32 (Continued)

Pneumat. Number (3) Unit 3	CRG/ Req. Code	System Name	Field	Line Size	Exp Size (4)	Fig. 6-2-6b No.	Valve Number	Type	C	Pipe Length (6)	Valve Position		Actuation		Valve Function		Port Size (10)	Port Flow DTR
											Open	Close	Pre	Post	Open	Close		
P615 ✓	CRG55	Main Steam Line D	Stream	26	26	11a)	R3120280	Globe	1	18'-5 1/8"	A	SP	OP	CL	CL	CL	133	Out
P615 ✓	CRG55	Main Steam Line D	Stream	26	26	11a)	R3120280	Globe	1	18'-5 1/8"	A	SP	OP	CL	CL	CL	133	Out
P615 ✓	CRG55	Main Steam Line D	Stream	26	26	11a)	R3120280	Globe	1	18'-5 1/8"	A	SP	OP	CL	CL	CL	133	Out
P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
P615 ✓	CRG55	Main Steam Line D	Stream	26	26	11a)	R3120288	Globe	0	17'-4 3/4"	A	SP	OP	CL	CL	CL	133	Out
P615 ✓	CRG55	Main Steam Line D	Stream	26	26	11a)	R3120288	Globe	1	17'-4 3/4"	A	SP	OP	CL	CL	CL	133	Out
P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
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P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
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P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
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P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0	20'-3 1/8"	E	M	OP	CL	CL	CL	51d	1
P615 ✓	CRG55	Main Steam Line D	Stream	1-1/2	1-1/2	11a)	R3120618	Globe	0									

TABLE 6.2-32 (Cont. from 6.2-31)

Pneumatics Number (3) Unit 1	CIC/ Reg. Cylinder	System Name	Field	Line Size (in)	Flow Rate (gpm)	Pipe Size (in)	Type C	Loc. (1)	Valve Type	Valve Size (in)	Actuation Type	Valve Position Open	Valve Position Closed	Isolation Signal (8)	Closure Time (sec)	Per Source (10)	Rev. Flow Dir.
P21	CIC56	HR Heat Exchanger Vent to Suppression Pool	Noncondens.	1	Yes	63	Yes	0	Mo	12'-9"	CL	CL	CL	CL	CL	2	In
P220	RCL 11	Containment/Drywell Pressure	Cont. Atmos.	3/4	Yes	38(b)	Yes	0	Yes	<10"	CL	CL	CL	CL	CL	1	In
P221	RCL 11	Suppression Pool Level Reference Leg Containment Pressure Containment Vacuum Relief	Cont. Atmos.	3/4	Yes	38(b)	Yes	0	Yes	<10"	CL	CL	CL	CL	CL	1	In
P216	CIC56	Containment Vacuum Relief	Cont. Atmos.	24	Yes	19	Yes	0	Yes	27'-6"	CL	CL	CL	CL	CL	2	In

TABLE 6.2-32 (Continued)

NOTES:

1. Through line leakage classification is discussed in Section 6.2.3.

2. Abbreviations used are as follows:

A - Air	LPCS - Low pressure core spray system
ADS - Automatic depressurization system	M - Manual
AI - As is	NA - Not applicable
B'fly - Butterfly valve	OP - Open
Chk - Check valve	P - Process fluid
CL - Closed	RCIC - Reactor core isolation cooling system
E - Electric	Rel - Relief valve
EH - Electrohydraulic	RHR - Residual heat removal system
EM - Electric motor	RWCU - Reactor water cleanup system
FC - Fail Closed	S - Solenoid
H - Hydraulic	SP - Spring
HPCS - High pressure core spray system	V - Vacuum in containment
LC - Locked closed	
LPCI - Low pressure coolant injection system	

3. Penetrations not listed are spares and are capped, except penetrations P202 (Unit 1)/P306 (Unit 2), P305/P205, and P311/P215, which are the equipment hatch and personnel airlocks.

4. *Essential Systems are* Engineered safety feature systems *which are required for shutdown* *characteristic items are non-ESF systems that can be desirable to use to mitigate the consequence of an accident.* *RAP*  
~~for shutdown.~~ ~~includes support systems required~~

5. Location inside (I) or outside (O) of containment.

6. Length of pipe from containment to outermost isolation valve.

7. All motor operated isolation valves remain in last position upon failure of valve power. All air operated valves close upon loss of motive air, except as indicated by Note 12, below.

8. Remote manual (RM) valves can be opened or closed by remote manual switch operation during any mode of reactor operation, except when an automatic signal is present. Remote manual valves have two sets of position indicator lights, one set at the remote manual switch, the other set at the control room isolation status panel. Isolation signals are defined as follows:

TABLE 6.2-32 (Continued)

NOTES (Cont'd)

<u>Signal</u>	<u>Description</u>
A	Reactor vessel low water level - level 3. (A scram occurs at this level. This is the highest of the three isolation low water level signals.)
B	Reactor vessel low water level - level 2. (This is the second of the three low water level signals. The reactor core isolation cooling and high pressure core spray systems are activated at this level.)
C	Reactor vessel low water level - level 1. (This is the lowest of the three water level signals. Main steam line isolation occurs at this level. The low pressure core spray and low pressure coolant injection systems are also activated at this level.)
D	High radiation - main steam line.
E	Line break - main steam line (steam line high steam flow).
F	Line break - main steam line (steam line high space temperature).
G	High drywell pressure.
H	Line break in reactor water cleanup system (high space temperature).
J	Line break in reactor core isolation cooling system steam line to turbine (low steam line pressure).
K	Line break in reactor core isolation cooling system steam line to turbine (high steam line space temperature, or high steam flow).
L	High differential flow in the reactor water cleanup system.
M	Line break in residual heat removal shutdown and heat cooling (high space temperature).
N	Low main condenser vacuum.
P	Low main steam line pressure at inlet to turbine (RUN mode, only).
S	High main steam line temperature, turbine building.



TABLE 6.2-32 (Continued)

NOTES (Cont'd)

<u>Signal</u>	<u>Description</u>
T	High pressure reactor isolation cooling turbine exhaust diaphragm.
U	High reactor vessel pressure - close residual heat removal - shutdown cooling valves and head cooling valves.
V	Low reactor vessel pressure.
W	High temperature at outlet of cleanup system nonregenerative heat exchanger.
X	Containment to atmosphere differential pressure greater than 0.0 psid.
Y	Standby liquid control system actuated.
Z	High radiation, containment and drywell ventilation exhaust.
RM <sub>c</sub>	Remote manual switch from control room. (All automatically actuated containment isolation valves are capable of remote operation from the control room.)
RM <sub>c</sub> <sup>*</sup>	Valve does not have an individual valve remote manual control switch, but uses a "system initiate" remote control switch which controls the valve as well as other functions.
RM <sub>s</sub>	Remote manual switch from shutdown panel. (Provided in addition to RM <sub>c</sub> , noted above, on selected valves as indicated.)
9.	Standard (Std.) closure time, based upon nominal pipe diameter, is approximately 12 inches/min for gate valves and approximately 4 inches/min for globe valves. The standard closure time for butterfly valves is 30 to 60 seconds.
10.	A-C motor operated valves required for isolation functions are powered from the a-c standby power buses. D-C operated isolation valves are powered from the batteries.
11.	Testable check valves are designed for remote opening with zero differential pressure across the valve seat. The valves close under reverse flow conditions, even if the test switch is positioned to open. The valves open when pump pressure exceeds reactor pressure, even if the test switch is positioned to close.
12.	Air operated check valves are only air closed. These valves act as simple check valves upon loss of air.

TABLE 6.2-32 (Continued)

NOTES (Cont'd)

13. Main steam line isolation valves require that both solenoid pilots be de-energized to close. Accumulator air pressure plus spring act to close valves when both pilots are de-energized. Voltage failure at only one pilot does not cause valve closure. These valves are designed to close fully in 3 to 5 seconds (see Section 5.4.5.3).
14. Inside personnel airlock.
15. During reactor operation, a blind flange is installed on the outboard end of the transfer tube as the containment boundary.