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June 29, 1990
PY-CEI/NRR-1193 L

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Perry Nuclear Power Plant (PNPP)
Docket No. 50-440
Generic Safety Issue
Implementation Status
Generic Letter 90-04

Gentlemen:

The subject Generic Letter requests PNPP implementation status of Generic Safety Issues according to format and content guidelines provided. This letter's attachment shows that status with supporting references.

We conclude that no new commitments are required. Please feel free to call if you have further questions.

Sincerely,

Michael D. Lyster
Vice President, Nuclear - Perry

MDL:njc

Attachment

cc: NRC Region III
T. Colburn
P. Hiland

9007060263 900629
PDR ADOCK 05000440
P PDC

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

A018
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GENERIC SAFETY ISSUE IMPLEMENTATION

<u>GSI/(MPA NO.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS</u>	<u>COMMENTS/REFERENCES</u>
40 (B065)	Safety Concerns Associated with Pipe Breaks in the BWR Scram System	All BWRs (sic*)	N/A	GL 86-01 states N/A to Mark III's.
41 (B058)	BWR Scram Discharge Volume Systems	All BWRs	C	Letter Davidson to Schwencer, 10/25/82
43 (B107)	Reliability of Air Systems	All Plants	C	PY-CEI/NRR-0971L, 2/22/89 PY-CEI/NRR-1080L, 10/23/89
51 (L913)	Improving the Reliability of Open-Cycle Service Water Systems	All Plants	I-(2)	PY-CEI/NRR-1121L, 1/26/90
67.3.3 (A017)	Improved Accident Monitoring	All Plants	I, E-(2)	Letter Youngblood to Edelman, 12/11/84 PY-CEI/NRR-0179L, 2/6/85 PY-CEI/NRR-0969L, 3/3/89 Letter Colburn to Kaplan, 7/14/89 Letter Miraglia to BWRG, 1/29/90
75** (B076)	Item 1.1 - Post-Trip Review (Program Description and Procedure)	All Plants	C	PY-CEI/NRR-0100L, 4/6/84 PY-CEI/NRR-0309L, 8/28/85 PY-CEI/NRR-0354L, 9/23/85
75 (B085)	Item 1.2 - Post-Trip Review - Data and Information Capability	All Plants	C	PY-CEI/NRR-0100L, 4/6/84 PY-CEI/NRR-0397L, 11/15/85
75 (B077)	Item 2.1 - Equipment Classification and Vendor Interface (Reactor Trip System Components)	All Plants	C	PY-CEI/NRR-0100L, 4/6/84 PY-CEI/NRR-0309L, 8/28/85

- (1) Implement water treatment - 8/90, performance testing/inspection of heat exchangers 2/90, resolve SSFI findings - 6/91, final confirmation of performance test/inspection schedules - 12/93.
- (2) (USAR Appendix 1B License Commitment No. 7) Define a schedule for neutron monitoring system modification by 7/90, subject to BWRG/NRC resolution of licensing basis. (License Commitment No. 16) Measure post-accident sample line loss pending NRC direction.
- * As identified in Generic Letter 90-04.

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75 (B086)	Item 2.2.1 - Equipment Classification for Safety-Related Components	All Plants	C	PY-CEI/NRR-0100L, 4/6/84
75 (L003)	Item 2.2.2 - Vendor Interface for Safety-Related Components	All Plants	E	PY-CEI/NRR-0100L, 4/6/84 GL 90-03 Under Review
75 (B078)	Items 3.1.1 & 3.1.2 - Post-Maintenance Testing (Reactor Trip System Components)	All Plants	C	PY-CEI/NRR-0100L, 4/6/84
75 (B079)	Item 3.1.3 - Post-Maintenance Testing-Changes to Test Requirements (Reactor Trip System Components)	All Plants	C	PY-CEI/NRR-0775L, 2/23/88
75 (B087)	Items 3.2.1 & 3.2.2 - Post-Maintenance Testing (All Other Safety-Related Components)	All Plants	C	PY-CEI/NRR-0100L, 4/6/84
75 (B088)	Item 3.2.3 - Post-Maintenance Testing-Changes to Test Requirements (All Other Safety-Related Components)	All Plants	C	PY-CEI/NRR-0775L, 2/23/88
75 (B080)	Item 4.1 - Reactor Trip System Reliability (Vendor-Related Modifications)	All Plan's (sic)	N/A	All PWR's per GL 83-28
75 (B031)	Items 4.2.1 & 4.2.2 - Reactor Trip System Reliability - Maintenance and Testing (Preventative Maintenance and Surveillance Program for Reactor Trip Breakers)	All PWRs	N/A	
75 (B082)	Item 4.3 - Reactor Trip System Reliability - Design Modifications (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B&W Plants)	All W and B&W Plants	N/A	
75 (B090)	Item 4.3 - Reactor Trip System Reliability - Tech Spec Changes (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B&W Plants)	All W and B&W Plan's	N/A	

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75 (B091)	Item 4.4 - Reactor Trip System Reliability (Improvements in Maintenance and Test Procedures for B&W Plants)	All B&W Plants	N/A	
75 (B092)	Item 4.5.1 - Reactor Trip System Reliability-Diverse Trip Features (System Functional Testing)	All Plants	C	FY-CEI/NRR-0100L, 4/6/84
75 (B093)	Items 4.5.2 & 4.5.3 - Reactor Trip System Reliability - Test Alternatives and Intervals (System Functional Testing)	All Plants	C	FY-CEI/NRR-3100L, 4/6/84 (3)
86 (B084)	Long Range Plan for Dealing with Stress Corrosion Cracking in BWR Piping	All BWRs	C	FWPP SER (NUREG 0857) 5.2.4, SSER 5/5.2.5.2, SSER 7/5.2.5.2 FY-CEI/NRR-0894L, 7/29/88 FY-CEI/NRR-1027L, 6/15/89 FY-CEI/NRR-1044L, 7/31/89
93 (B098)	Steam Binding of Auxiliary Feedwater Pumps	All PWRs	N/A	
99 (L817)	RCS/RHR Suction Line Valve Interlock on PWRs	All PWRs	N/A	
124	Auxiliary Feedwater System Reliability	ANO-1&2, Rancho Seco, Prairie Island 1&2, Crystal River-3, Ft. Calhoun	N/A	
A-13 (B017)	Snubber Operability Assurance - Hydraulic Snubbers	All Plants	C	FY-CEI/NRR-0449L, 4/15/86 Technical Specifications 3/4.7.4

(3) NEDC 30844, "BWR Owner's Group Response to Generic Letter 83-28, Item 4.5.3, January 1985.

GENERIC SAFETY ISSUE IMPLEMENTATION

<u>GSI/(MPA NO.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS</u>	<u>COMMENTS/REFERENCES</u>
A-13 (B022)	Snubber Operability Assurance - Mechanical Snubbers	All Plants	C	PY-CEI/NRR-0449L, 4/15/86 Technical Specifications 3/4.7.4
A-16 (D012)	Steam Effects on BWR Core Spray Distribution	Oyster Creek & NPP-1	N/A	
A-35 (B023)	Adequacy of Offsite Power Systems	All Plants		Letter Davidson to Schwencer, 8/26/82 USAR 8.3.1.1.2.9 responds to Branch Tech Position PSB-1 SSER 2/8.2.4
B-10	Behavior of BWR Mark III Containments	All BWR Mark III Plants	C	(4)
B-36	Develop Design, Testing and Maintenance Criteria for Atmosphere Cleanup System Air Filtration and Adsorption Units for Engineered Safety Features Systems (Regulatory Guide 1.52) and for Normal Ventilation Systems (Regulatory Guide 1.140)	All Plants with OL Applications After 4/1/80	C	(5)
B-61 (B045)	Isolation of Low Pressure Systems Connected to the Reactor Coolant System Pressure Boundary	All Plants (sic)	N/A	

(4) Appendix R to SSER 8 provides the references supporting the NRS Staff conclusion in SSER 8/6.2 that the 66 Humphrey containment system design concerns have been addressed and resolved for PNPP. PNPP submittals material to that resolution include letters dated September 9, 1982 (D.R. Davidson to A. Schwencer; PY-CEI/NRR-007L January 26, 1983 (M.R. Edelman to B.J. Youngblood); PY-CEI/NRR-088L January 5, PY-CEI/NRR-0123L July 11, and PY-CEI/NRR-0151L November 1, 1984 (M.R. Edelman to B.J. Youngblood); PY-CEI/NRR-0235L May 16, PY-CEI/NRR-0281L June 24, PY-CEI/NRR-0336L September 13, PY-CEI/NRR-0351L September 23, PY-CEI/NRR-0363L September 24, PY-CEI/NRR-0371L October 8, PY-CEI/NRR-0390L November 11, PY-CEI/NRR-0392L November 11, 1985 (M.R. Edelman to B.J. Youngblood).

(5) The PNPP licensing basis for subject Regulatory Guide compliance was established in the original FSAR dated 9/12/80 in Table 1.8-1. The appropriate revision was determined by referencing the NRC Regulatory Requirement Review Committee (RRRC) categorization. Regulatory Guide 1.52 was Category 2 - evaluated for backfitting need and Regulatory Guide 1.140 was Category 1 - forward fit only. SER 6.5.1.4 accepts RG 1.52 - Revision 4 conformance, and SER 9.4.1 & 9.4.3 accept RG 1.140 - Revision 0 conformance.

GL 90-04 Guidance For Completing Status Column

- (1) Provide a separate entry for each licensed reactor unit. If the information is identical for multiple units, so state.
- (2) If a GSI is not applicable to a unit(s), enter "NA".
- (3) If a GSI is applicable but no changes were necessary to implement the resolution, enter "NC". If the GSI implementation was completed prior to issuance of the operating license, enter "NC", as no post-licensing changes were necessary.
- (4) If a GSI is applicable, submittal of information and/or changes were necessary and such submittals were made or changes are complete, enter "C". Also identify the licensee's document(s) to the NRC which certified completion, and the document date(s).
- (5) If a GSI is applicable and changes are necessary but such changes are not yet fully implemented, enter "I" and the projected month and year of completion. Provide a brief explanation of the outstanding work in the "Comments" column.
- (6) If implementation guidance for a resolved GSI was issued recently and the licensee is still evaluating the appropriate response, enter "E" and the projected response date.
- (7) The "Comments" column may be used to explain any entry in the "Status" column.