



PERRY NUCLEAR POWER PLANT
10 CENTER ROAD
PERRY, OHIO 44081
(216) 259-3737

Mail Address:
P.O. BOX 97
PERRY, OHIO 44081

Michael D. Lyster
Vice President - Nuclear

October 16, 1990
PY-CEI/NRR-1234 L

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

Perry Nuclear Power Plant
Docket No. 50-440
Supplement to Technical Specification
Change Request: Miscellaneous
Administrative Changes

Gentlemen:

Enclosed is a supplement to the License Amendment Request submitted on September 13, 1990 by letter PY-CEI/NRR-1214L for the Perry Nuclear Power Plant (PNPP) Unit 1 Facility Operating License NPF-58. This supplement proposes several additional administrative changes to PNPP's Technical Specifications which are determined not likely to involve significant hazards considerations in accordance with previously published Commission guidance (51 FR 7751). We have reviewed the enclosed changes and concluded that the Significant Hazard and Environmental Considerations for our original License Amendment Request, contained in letter PY-CEI/NRR-1214L dated September 13, 1990, remain valid and are still applicable. Attachment 1 provides a summary of the proposed changes. Attachment 2 provides a copy of the marked up Technical Specification pages. A copy of this supplement has been sent to the State of Ohio as indicated below.

If you have any questions, please feel free to call.

Sincerely,

Michael D. Lyster

MDL:CJF:njc
Attachment

cc: NRR Project Manager
Sr. Resident Inspector
USNRC Region III
State of Ohio

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P FDC

Operating Units
Cleveland Electric Illuminating
Toledo Edison

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In proposing the addition of TS 3.8.1.1 Action (j), it was the Licensee's intention that the proposed Action (j) be applicable in all Operational Conditions, whenever fuel oil did not meet the specified surveillance requirements. However, upon implementation of Amendment 34 during PNPP's second refueling outage, it was quickly realized that our original License Amendment Request inadvertently limited the application of Action (j) to Operational Conditions 1, 2 and 3 because it was only added within TS 3.8.1.1. To correct this oversight and maintain consistency in the Action Requirements when fuel oil does not meet the specified limits of Surveillance Requirement 4.8.1.1.2.d.2 or 4.8.1.1.2.e, for all Operational Conditions, the requirements of TS 3.8.1.1 Action (j) are to be added to TS 3.8.1.2 as new Action (c). This change has been reviewed and determined to be consistent with the Significant Hazard and Environmental Considerations for our original License Amendment Request encompassing the addition of Specification 3.8.1.1 Action (j), which continues to remain valid and applicable for this change request (reference letter PY-CEI/NRR-1133 L dated March 21, 1990). In addition, CEI considers this change to fall within previously published Commission guidance on amendments considered not likely to involve a significant hazards consideration (51 FR 7751) in that it is a change to achieve consistency throughout PNPP's Technical Specifications.

The Bases for Specification 3.0.1 is to be corrected by changing an "or" to an "of" so that the second sentence of the last paragraph on page B 3/4 0-1 will read as follows:

"The time limits of the ACTION requirements are also applicable when a system or component is removed from service for surveillance testing or investigation of operational problems."

This change to the Bases for Specification 3.0.1 is a purely administrative change to correct a typographical error, and as such, is determined not likely to involve a significant hazards consideration.

All the above proposed changes to PNPP's Technical Specifications have been reviewed for Significant Hazard and Environmental Considerations and it has been concluded that the Significant Hazard and Environmental Considerations for the original License Amendment Request, contained in letter PY-CEI/NRR-1214L dated September 13, 1990 remain valid and are still applicable.

**SUPPLEMENT TO PERRY NUCLEAR POWER PLANT TECHNICAL SPECIFICATION
CHANGE REQUEST: MISCELLANEOUS ADMINISTRATIVE CHANGES**

This supplement to PNPP's License Amendment Request submitted by letter PY-CEI/NRR-1214L on September 13, 1990 proposes additional administrative changes determined not likely to involve significant hazards considerations in accordance with previously published Commission guidance (51 FR 7751). A summary of each proposed change is provided below. A copy of the marked up Technical Specification pages is provided in Attachment 2.

Summary

In footnote ** on the bottom of page 3/4 8-5, the reference to Surveillance Requirement 4.8.1.1.2.e.1 is to be changed to 4.8.1.1.2.f.1. Similarly, the references to Surveillance Requirements 4.8.1.1.2.e.4.a.2 and 4.8.1.1.2.e.6.a.2 contained within Surveillance Requirement 4.8.1.1.2.f.8 (middle of page 3/4 8-8) and within footnote * on the bottom of page 3/4 8-8, are to be changed to 4.8.1.1.2.f.4.a.2 and 4.8.1.1.2.f.6.a.2, respectively.

These changes are required to correct misreferences resulting from the changes approved by License Amendment 34 to PNPP Facility Operating License NPP-58 granted September 27, 1990. Amendment 34 consists of an approval of changes to Specification 4.8.1.1.2 regarding PNPP's emergency diesel generator fuel oil sampling program. Amendment 34 resulted in the addition of new Specification 4.8.1.1.2.e and the renumbering of original Specification 4.8.1.1.2.e as 4.8.1.1.2.f. However, Amendment 34 inadvertently failed to change the references to former Specification 4.8.1.1.2.e as required to maintain consistency with the redesignation of former Specification 4.8.1.1.2.e to 4.8.1.1.2.f. The proposed changes to the above references correct this error and therefore constitute purely administrative changes determined not likely to involve a significant hazards consideration.

Specification 4.8.1.1.2.d.1.a is to be revised by changing the reference from ASTM D1298-88 to ASTM D1298-85. This change is necessary to correct a typographical error as 1985 is the year of last revision for ASTM D1298, and as such is determined not likely to involve a significant hazards consideration.

Technical Specification 3.8.1.2 is to be revised by adding new Action (c) (see Attachment 2, page 4 of 5) and redesignating existing Action (c) as Action (d). This change is proposed to obtain consistency between Specifications 3.8.1.2 and 3.8.1.1 as revised by Amendment 34 granted September 27, 1990 pursuant to the License Amendment Request contained in letter PY-CEI/NRR-1133L dated March 21, 1990. Amendment 34 added Action (j) to Specification 3.8.1.1 to clarify the Action Requirements to be taken when fuel oil does not meet the specified limits of Surveillance Requirements 4.8.1.1.2.d.2 or 4.8.1.1.2.e.