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December 16, 1993
PY-CEI/NRR-1732 L

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

Perry Nuclear Power Plant
Docket No. -440
License Amendment Request: Conversion
to Technical Specifications Based on
NUREG-1434 "Improved BWR-6 Technical
Specifications" Revision 0

Gentlemen:

Enclosed is an application for amendment of the Facility Operating License (NPF-58) Appendix A Technical Specifications for the Perry Nuclear Power Plant (PNPP) Unit 1.

This License Amendment application consists of proposed changes to improve and reformat the PNPP Technical Specifications, based on NUREG-1434 "Improved BWR-6 Technical Specifications", Revision 0, September 1992. This submittal has been prepared in concert with the other BWR-6 owners, such that significant NRC resource savings can be realized through generic review of the application of NUREG-1434 to the BWR-6 plants.

As noted in the Nuclear Regulatory Commission Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors (58 FR 39132), implementation of the Improved Technical Specifications is expected to produce an improvement in safety through the use of more operator-oriented Specifications, improved Bases, reduced action statement induced plant transients, and more efficient use of NRC and utility resources.

Three Enclosures are provided which contain the information necessary for review of the proposed changes.

Enclosure 1 provides the No Significant Hazards Consideration (NSHC) evaluations which are generic in nature, and are therefore applicable to many of the proposed changes to the Technical Specifications. These generic NSHC evaluations apply to changes annotated within Enclosure 2 with an "A" (Administrative); "R" (relocated); "M" (technical change - more restrictive); and "LA", "LB" and "LC" (generic technical change - less restrictive). Enclosure 1 also contains the Environmental Consideration for the proposed changes.

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Operating Companies:
Cleveland Electric Illuminating
Toledo Edison

Limited Dist.

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Enclosure 2 is arranged by Technical Specification section. For each section, two Attachments are provided. Attachment 1 of each section contains the information necessary to identify and justify the specific proposed changes to the current PNPP Technical Specifications. Attachment 2 of each section contains the information necessary to identify and justify the proposed changes to NUREG-1434 in order to apply the NUREG to PNPP. Specifically, the Attachments contain the following information:

- Attachment 1A - Markups of the Current Technical Specifications (CTS)
- Attachment 1B - Discussion of each proposed change to the CTS
- Attachment 1C - NSHC evaluations for changes annotated as "L" (specific technical change - less restrictive)
- Attachment 2A - Markups of NUREG-1434, including use of annotation categories of "B" (provides plant-specific information contained in brackets in NUREG-1434); "P" (provides plant specific information not contained in brackets in NUREG-1434); or "C" (denotes a generic change to NUREG-1434)
- Attachment 2B - Discussion of each proposed change to NUREG-1434

Enclosure 3 provides the results of application of the criteria contained in the NRC Final Policy Statement on Technical Specification Improvements to the current PNPP Technical Specifications.

If you have questions or require additional information, please contact Henry Hegrat - Regulatory Affairs at (216) 259-3737 extension 5606.

Sincerely,

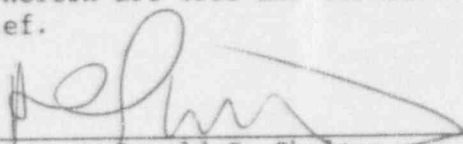


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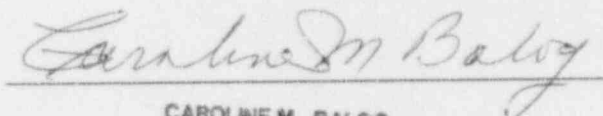
Enclosures

cc: NRC Project Manager
NRC Resident Inspector Office
NRC Region III

I, Donald C. Shelton, being duly sworn state that (1) I am Senior Vice President - Nuclear, of the Centerior Service Company, (2) I am duly authorized to execute and file this certification on behalf of The Cleveland Electric Illuminating Company and Toledo Edison Company, and as the duly authorized agent for Duquesne Light Company, Ohio Edison Company, and Pennsylvania Power Company, and (3) the statements set forth herein are true and correct to the best of my knowledge, information and belief.


Donald C. Shelton

Sworn to and subscribed before me, this 16th day of DECEMBER,
1993.



CAROLWE M. BALOG
Notary Public, State of Ohio
My Commission expires April 20, 1995
(Recorded in Lake County)