



**CENTERIOR
ENERGY**

PERRY NUCLEAR POWER PLANT

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

Mail Address:
PO. BOX 97
PERRY, OHIO 44081

Donald C. Shelton
SENIOR VICE PRESIDENT
NUCLEAR

May 18, 1995
PY-CEI/NRR-1951L

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Perry Nuclear Power Plant
Docket No. 50-440

Supplemental Submittal for Conversion of Current Technical Specifications to Technical Specifications Based on NUREG-1434, "Improved BWR6 Technical Specifications," Revision 0

Gentlemen:

Enclosed is supplemental information related to previous applications for amendment of the Facility Operating License (NPF-58) Appendix A Technical Specifications for the Perry Nuclear Power Plant (PNPP). This supplements the application made December 16, 1993 by letter PY-CEI/NRR-1732L, as revised by letter PY-CEI/NRR-1880L dated November 7, 1994, and letter PY-CEI/NRR-1944L dated May 5, 1995.

This information addresses minor discrepancies and items needing clarification found during various reviews and discussions with the NRC staff. Attachment 1 provides a brief explanation of the reason for each change. Attachment 2 provides a mark up of the proposed changes to the Technical Specification and Bases pages and justifications. The remaining justifications, Significant Hazards Considerations, and Environmental Considerations provided in the December 16, 1993 and November 7, 1994 applications remain valid.

Attachment 3 provides a matrix of items totally and partially relocated from the current Technical Specifications. The matrix identifies each relocated Technical Specification (by its current number), the corresponding new location (e.g., the Updated Safety Analysis Report), and the applicable regulation or requirement (e.g., 10 CFR 50.59) that provides controls on future changes to these requirements.

During discussions with the Staff concerning the acceptability of the proposed changes to LCO 3.0.4, the Staff identified a concern regarding inoperable Emergency Core Cooling System (ECCS) actuation instrumentation in MODES 4 and 5. In MODES 1, 2, and 3, the ECCS instrumentation LCO provides specific Required Actions and Completion Times if an inoperable instrument results in a loss of ECCS actuation capability. PNPP will put in place administrative controls to ensure that losses of ECCS instrumentation actuation capability in MODES 4 and 5 will have compensatory actions taken consistent with those required in MODES 1, 2, and 3.

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

9505250155 950518
PDR ADOCK 05000440
P PDR

ADD 11

PY-CEI/NRR-1951L

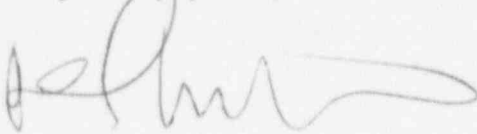
May 18, 1995

Page 2 of 2

In accordance with the request in your letter dated May 10, 1995, PNPP is requesting an implementation date of no later than 120 days following the end of the next refueling outage. That outage is currently scheduled to begin in January 1996 and be complete in March 1996.

If you have questions or require additional information, please contact Mr. James D. Kloosterman, Manager - Regulatory Affairs at (216) 280-5833.

Very truly yours,

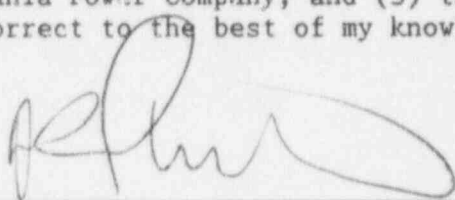


CS0:sc

Attachments

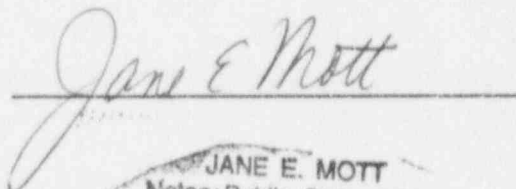
cc: NRC Project Manager
NRC Resident Inspector Office
NRC Region III
State of Ohio

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, the 18th day of May,
1995.



JANE E. MOTT
Notary Public, State of Ohio
My Commission Expires Feb. 20, 2000
(Recorded in Lake County)

CODED/8838/SC

Information is listed below explaining the nature of the changes resulting from discussions with the NRC improved Technical Specifications (ITS) Project Manager. The changes: clarify material already submitted to the NRC; do not change actions, frequencies, setpoints, or allowable values in either the current Technical Specifications (CTS) or ITS; and are editorial or administrative in nature. Furthermore, the changes have no safety significance.

1. CTS Table 3.3.2-1 was changed to identify the deletion of system isolations resulting from delta temperature signals. A revised markup of the CTS and a Discussion of Change are included which reflect material already included in the ITS markup.
2. Footnote (b) for Table 3.3.7.1-1 was clarified and made consistent with other similar footnotes by deleting the word "or" and adding "and" as noted. The original site concern which resulted in the proposed use of "or" was that an individual might not understand the convention and think that all three conditions would have to be met simultaneously in order to use the footnote. This issue will be addressed in training.
3. CTS Figure 3.4.1.1-1 and LCO 3.4.1.1 have been combined to form ITS Figure 3.4.1-1. This is more clearly explained with the new Discussion of Change A.12.
4. A Note was added to ITS 3.4.6 Required Action A.1. This Note was in the original version of NUREG-1434, but was deleted in the conversion process by the BWR6 plants. During reviews, the NRC staff decided that the Note should be retained. The Note, as modified to agree with CTS, is added.
5. Amendment 60 to the Perry Nuclear Power Plant Technical Specifications implemented a portion of the changes requested by PY-CEI/NRR-1576L, but did not grant the portion of the changes referenced in Discussion of Change A.3 in CTS 3.6.1.2. Therefore, Discussion of Change A.3 is not applicable and is being deleted. Further review of this item indicates that the CTS Discussion of Change A.1 is applicable to this change and the CTS markup has been changed to reference this Discussion of Change instead of A.3.
6. The mark up of CTS 3.4.1.4 is changed slightly to delete Discussion of Change LA.1 which no longer applies as a result of deleting the proposed requirement for a Pressure and Temperature Limits Report in the ITS. The change was made correctly elsewhere and was reflected properly in the mark up of the ITS.
7. Discussion of Change M.1 for CTS 3.8.2.1 is revised to reflect that the surveillance frequency was changed from seven days to 72 hours, not 24 hours.