



**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

June 1, 1995
PY-CEI/NRR-1956L

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

Perry Nuclear Power Plant
Docket No. 50-440
License Amendment Request: Implementation of Control Rod Drive Scram
Time Testing Consistent With the Requirements in the PNPP Improved
Technical Specification License Amendment Request

Gentlemen:

Attached is an application for amendment of the Facility Operating License (NPF-58) Appendix A Technical Specifications for the Perry Nuclear Power Plant (PNPP). This License Amendment application proposes early implementation of a portion of the changes proposed in a submittal dated December 16, 1993 by letter PY-CEI/NRR-1732L, to convert the current Technical Specifications into the improved Technical Specification format based on NUREG-1434, "Improved Technical Specifications," Revision 0.

Among the items requested in the conversion were changes to the Surveillance Requirements for control rod drive (CRD) scram time testing. Presently, CRD scram time testing for control rods that had maintenance or modification work performed [Surveillance Requirement (SR) 4.1.3.2.b] must be completed in OPERATIONAL CONDITION 2 with reactor coolant pressure greater than or equal to 950 pounds per square inch - gauge (psig).

The proposed Surveillance testing requirements for CRDs that had maintenance or modification work performed on them are as follows. First, CRD scram time testing must be performed prior to considering the CRD OPERABLE, and can be performed at any reactor pressure. This requirement is more restrictive than present test requirements, and will typically be performed prior to entry into OPERATIONAL CONDITION 2. Additional testing is required to be performed when reactor coolant pressure is greater than or equal to 950 psig and prior to 40% RATED THERMAL POWER. Testing performed to meet this requirement will typically be completed at power levels above 15% RATED THERMAL POWER, which is the point when the generator is usually synchronized to the grid.

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Operating Companies
Cleveland Electric Illuminating
Toledo Edison

ADD 1

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The proposed CRD scram time testing surveillance requirements in SR 4.1.3.2 provide consistency with the improved Technical Specification conversion submittals with respect to CRDs that have had maintenance or modification performed. The current requirements for other CRD scram time testing requirements are not being changed by this request.

Attachment 1 provides a marked up copy of the changes in the current Technical Specifications. Attachment 2 provides a mark up of the associated Bases changes. The M1 justification to LCO 3.1.3.2, the Significant Hazards Consideration, and the Environmental Consideration provided in the December 16, 1993 application remain valid and are included as Attachment 3. Several supplements to the December 16, 1993 license amendment application have been submitted, but had no impact on the requirements being implemented herein.

Issuance of this amendment is requested by January 5, 1996, prior to the fifth refueling outage (RF05). The present surveillance tests must be completed while in OPERATIONAL CONDITION 2, and is part of the critical path for completing the outage. Even though the proposed changes will require additional testing and are therefore more restrictive, the proposed testing should not be part of the critical path of the outage. Therefore, implementation of these testing requirement changes will reduce the overall length of the RF05 outage duration by allowing performance of CRD scram time testing during time periods that are not on the critical path for the outage.

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

Very truly yours,



GGR:sc

Attachments

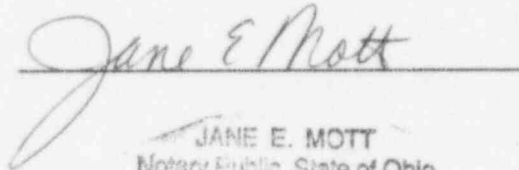
cc: NRC Project Manager
NRC Resident Inspector Office
NRC Region III
State of Ohio

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 1st day of June,
1995.



JANE E. MOTT
Notary Public, State of Ohio
My Commission Expires Feb. 20, 2003
(Recorded in Lake County)

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