



**CENTERIOR
ENERGY**

PERRY NUCLEAR POWER PLANT

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SENIOR VICE PRESIDENT
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June 9, 1995
PY-CEI/NRR-1954L

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

Perry Nuclear Power Plant
Docket No. 50-440
License Amendment Request: Surveillance Test
Interval Extension Request - Supplement

Gentlemen:

Enclosed please find an application for changes to the Perry Nuclear Power Plant (PNPP) Unit 1 Technical Specifications, reflecting a one-time extension of the performance intervals for certain Technical Specification Surveillance Requirements (SR). This application supplements the original request submitted by letter PY-CEI/NRR-1890L on March 24, 1995. The affected SRs include American Society of Mechanical Engineers (ASME) Code Section XI valve testing, other Technical Specification required valve testing, and instrumentation Logic System Functional Tests.

The proposed changes are requested on a one-time basis only, to support the current schedule for Refueling Outage 5 (RFO-5), presently scheduled to begin no later than February 15, 1996. Existing Technical Specifications would require a plant shutdown prior to the end of the current fuel cycle solely to perform surveillances. Such a shutdown would cause an unnecessary transient on the plant and result in additional radiation exposure to personnel. In addition, the proposed interval extensions that extend into RFO-5 are necessary to maintain the "defense in depth" and critical path of the outage as it is presently planned. Durations of the proposed extensions were selected to accommodate the most conservative start and end dates for the outage. A good faith effort to complete the necessary surveillance activities will be made if an outage of sufficient duration occurs prior to RFO-5.

To justify the extensions, the requests either incorporate plant specific data and test history, or reflect industry and vendor evaluations which have been reviewed and approved by the NRC on other dockets. Specific reports and data utilized are delineated in the specific request for each surveillance interval extension.

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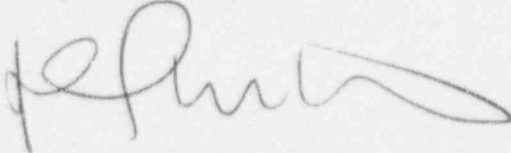
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Attachments 1, 2, and 3 provide a Summary of the proposed Technical Specification changes, a marked-up copy of the affected Technical Specification pages, and the Significant Hazards Consideration, respectively. Enclosures 1 through 4 provide the justifications for the individual Technical Specification changes.

Issuance of the proposed changes is requested by September 1, 1995, so that impact on the fuel cycle planning efforts can be minimized.

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

Very truly yours,




Attachments and Enclosures

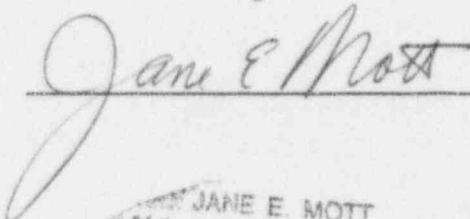
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cc: Region III Administrator
Resident Inspector Office
WRC/NRR Project Manager
State of Ohio

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 9th day of June,
1995.


Jane E. Mott

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

CODED/8838/SC

SUMMARY

The Perry Nuclear Power Plant (PNPP), Unit 1 Technical Specification (TS) Surveillance Requirements (SRs) require surveillance testing to be conducted nominally at refueling intervals but at least once every 18 months. Technical Specification 4.0.2 allows a 25% extension of the surveillance interval to 22.5 months, if required, to provide flexibility in cycle lengths. By letter PY-CEI/NRR-1890L, dated March 24, 1995, extensions of several surveillance intervals were requested to accommodate the schedule for PNPP Refueling Outage 5 (RFO-5). This supplement identifies other surveillance testing intervals which will require extensions.

The PNPP TS requires that Emergency Core Cooling System (ECCS) Actuation Instrumentation Logic System Functional Tests (LSFTs) be performed on the Division 1, 2, and 3 Undervoltage and Degraded Voltage instrumentation at least once per 18 months, with a maximum allowable extension of 25% as allowed by TS 4.0.2. In addition, ASME Section XI testing involving valve position indication verification, leak rate testing, stroke testing and stroke timing is required to be performed nominally at refueling intervals but at least once every 2 years. The extension of these intervals by the provisions of TS 4.0.2 is not allowed.

A one-time change to the PNPP TS is being requested to extend the performance intervals for specific TS SRs. The lengths of the last refueling outage (RFO-4) and the present fuel cycle will cause several SRs to become due prior to the next refueling outage (RFO-5), presently planned to begin no later than February 15, 1996. Performance of the required surveillance tests under conditions other than a plant shutdown either is not possible or would cause the plant to be placed in an undesirable configuration which may increase the probability of a plant trip. Shutdown solely to perform surveillance tests would cause an unnecessary thermal transient on the plant and would result in additional radiation exposure to personnel. Accordingly, it is proposed that the PNPP TS be revised to allow performance of the cited surveillance tests during RFO-5. Surveillance Requirements for LCOs applicable in Operational Conditions 1, 2, and 3 are proposed to be revised to state "may be extended to be performed during the fifth refueling outage".

In addition, TS SRs wherein OPERABILITY requirements include Operational Conditions 4 and 5 are proposed for extension through the outage, conservatively scheduled to end no later than June 1, 1996. These SRs are proposed to be extended to support the scheduled system outage windows that were established to provide "defense in depth" (NUMARC 91-06, "Guidelines for Industry Actions to Assess Shutdown Management", December 1991) during the shutdown period and to maintain the critical path of the outage. Performance of these surveillances prior to the scheduled system outage windows would result in unnecessary outage extension, and a reduction in the "defense in depth" built into the outage schedule (due to extension of critical system outage times and increase in shutdown risk). Proposed revisions to such TS SRs state that the SRs "may be extended to the completion of the fifth refueling outage."

Approval of the proposed changes is requested by September 1, 1995, in order that the effects on the current fuel cycle and RFO-5 planning efforts can be minimized.

SAFETY ANALYSIS

The TS SRs affected by this change are as follows. The justification for extension of each TS SR is provided within the Enclosure noted.

- TS SR 4.0.5 (Enclosure 1)
- TS SR 4.3.3.2, Table 4.3.3.1-1, Items D.1 and D.2 (Enclosure 2)
- TS SR 4.3.7.5, Table 4.3.7.5-1, Item 17 (Enclosure 3)
- TS SR 4.6.1.2.h (Enclosure 4)

DESCRIPTION OF THE PROPOSED TECHNICAL SPECIFICATION AND BASES CHANGES

Refer to Attachment 2 for a marked-up copy of the affected Technical Specification pages. As cited above, a one-time change to surveillance intervals is being noted such that a) for surveillances that are part of TSs that are required in Operational Conditions 1, 2, and 3, the note will read "May be extended to be performed during the fifth refueling outage", and b) for surveillances that are part of TSs that are necessary to support activities or equipment required in Operational Conditions 4 and 5, the note will read "May be extended to the completion of the fifth refueling outage".

SIGNIFICANT HAZARDS CONSIDERATION

The discussion of whether the proposed change involves a significant hazards consideration is provided in Attachment 3.

ENVIRONMENTAL CONSIDERATION

The proposed Technical Specification change request was evaluated against the criteria of 10 CFR 51.22 for environmental considerations. As discussed above and in Attachment 3, the proposed change does not involve a significant hazards consideration, it does not increase the types and amounts of effluents that may be released offsite, and it does not significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, it has been concluded that the proposed Technical Specification change meets the criteria given in 10 CFR 51.22(c)(9) for categorical exclusion from the requirement for an Environmental Impact Statement.