



*Perry Nuclear Power Plant  
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**Frank R. Payne**  
*Site Vice President, Perry Nuclear*

440-280-5382

March 25, 2020  
L-20-021

10 CFR 50.46

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

SUBJECT:  
Perry Nuclear Power Plant  
Docket No. 50-440, License No. NPF-58  
2019 Annual Report of Emergency Core Cooling System Errors and Model Changes

Attached is the 2019 Annual Report of Emergency Core Cooling System Errors and Model Changes for the Perry Nuclear Power Plant (PNPP). Energy Harbor Nuclear Corp. is submitting this report to the Nuclear Regulatory Commission (NRC) in accordance with 10 CFR 50.46(a)(3)(ii).

In Operating Cycle 17, PNPP had a mixed core of GE14 and GNF2 fuel. During the refueling outage that ended in April 2019, PNPP went to a complete core of GNF2 fuel.

There are no regulatory commitments contained in this submittal. If there are any questions or if additional information is required, please contact Mr. Phil H. Lashley, Acting Manager – Nuclear Licensing and Regulatory Affairs, at (330) 315-6808.

Sincerely,

A handwritten signature in blue ink that reads "Frank R. Payne".

Frank R. Payne

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Attachment:  
2019 Annual Report of Emergency Core Cooling System Errors and Model Changes

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

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**New Errors and Changes:**

Change in an acceptable evaluation model or application of such model:

None.

**Errors:**

10 CFR 50.46 Notification 2019-05, SAFER Lower Limit on Differential Pressure for Bypass Leakage, was received on October 23, 2019. This notification is applicable to both GE14 and GNF2 fuel in use at Perry.

In Operating Cycle 17, PNPP had a mixed core of GE14 and GNF2 fuel. During the refueling outage that ended in April 2019, PNPP went to a complete core of GNF2 fuel.

The error in evaluation model (Notification 2019-05) was reported to the Nuclear Regulatory Commission (NRC) on November 19, 2019, (Accession No. ML19323F143).

**Report Summary:**

The changes to and errors in the PNPP emergency core cooling system (ECCS) evaluation model in 2019 are summarized in the following table:

Perry Nuclear Power Plant, Unit 1		GE14 fuel	GNF2 fuel
		PCT or PCT change	PCT or PCT change
Licensing Basis PCT at BEGINNING of 2019		1555°F	1630°F
2019 Activity			
EM errors	Notification 2019-05	0°F	0°F
EM Changes	None	None	None
Licensing Basis PCT at END of 2019		1555°F	1610°F