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ENERGY**

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

Perry Nuclear Power Plant
Docket No. 50-440
Miscellaneous Changes to Bases Section
of PNPP Unit 1 Technical Specifications

Gentlemen:

Enclosed are requested changes to the Bases for the Perry Nuclear Power Plant (PNPP) Unit 1 Technical Specifications, to incorporate miscellaneous changes not associated with any future Technical Specification change requests. Attachment 1 provides a summary of the proposed changes. Attachment 2 provides a copy of the marked up Bases pages. As noted in 10 CFR 50.36(a), the Bases are not considered a formal part of the Technical Specifications. The changes are therefore provided to the NRC for information, and to permit their incorporation into the NRC-issued pages. After processing, it is requested that any retyped pages be transmitted to the PNPP site for controlled distribution.

If you have any questions, please feel free to call.

Sincerely,

Michael D. Lyster

MDL:CJF:ss

Attachments

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

9204020047 920330
PDR ADDCK 05000440
P PDR

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

Accol
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SUMMARY

The following proposed changes to the Bases Section of PNPP's Unit 1 Technical Specifications incorporate miscellaneous changes not associated with any future Technical Specification change requests. The proposed changes constitute either purely administrative changes designed to achieve consistency between the PNPP Unit 1 Technical Specifications and the Technical Specification Bases, provide clarification, correct existing errors, or delete material no longer applicable to PNPP Unit 1 Technical Specifications Bases. Pursuant to 10 CFR 50.36(a), the following changes do not constitute a change to the PNPP Technical Specifications nor to PNPP Facility Operating License No. NPF-58, since 10 CFR 50.36(a) excludes the Bases from becoming a formal part of the Technical Specifications.

(1) BASES SECTION(S): 3/4.1.5, Standby Liquid Control System.

PAGE NUMBER(S): B 3/4 1-4

DESCRIPTION OF PROPOSED CHANGE(S): The proposed change modifies Bases 3/4.1.5, Standby Liquid Control System, paragraph 1, sentence 4, to read as follows: "The required concentration is achieved by having a minimum available quantity of 4260 gallons of sodium pentaborate solution, 13.8% by weight, containing a minimum of 5236 lbs. of sodium pentaborate." Refer to Attachment 2, page 1 of 5 for a copy of marked up Bases page B 3/4 1-4.

JUSTIFICATION FOR PROPOSED CHANGE(S): The proposed change to Bases 3/4.1.5 is an editorial change to make the Bases consistent with Technical Specification 3.1.5, Standby Liquid Control, Figure 3.1.5.1, Sodium Pentaborate Solution Concentration/Volume Requirements.

The Bases currently states that "[t]he required concentration is achieved by having a minimum available quantity of 4409 gallons of sodium pentaborate solution, 13.4% by weight, containing a minimum of 5236 lbs. of sodium pentaborate." While the statement is not incorrect, it merely represents the minimum available quantity of sodium pentaborate solution for a given solution concentration ratio, i.e., at 13.4% by weight (which also happens to correspond with the SLC storage tank low level alarm setpoint). This statement does not represent the absolute minimum available quantity of sodium pentaborate solution allowed by Technical Specification 3.1.5 to achieve the required sodium pentaborate concentration. According to Specification 3/4.1.5 and Figure 3.1.5.1, the minimum available quantity of sodium pentaborate solution necessary to achieve the required concentration is 4260 gallons, 13.8% by weight. Therefore, the Bases statement is revised for clarification to read as follows: "The required concentration is achieved by having a minimum available quantity of 4260 gallons of sodium pentaborate solution, 13.8% by weight, containing a minimum of 5236 lbs. of sodium pentaborate." Consequently, the proposed change constitutes a purely administrative change designed to provide clarification and to achieve consistency between Bases 3/4.1.5 and Specification 3.1.5, Figure 3.1.5.1. As such, the proposed change does not involve a significant hazards consideration.

- (2) BASES SECTION(S): 3/4.6.3, Depressurization Systems.

PAGE NUMBER(S): B 3/4 6-5

DESCRIPTION OF PROPOSED CHANGE(S): The proposed change modifies Bases 3/4.6.3 Depressurization Systems, paragraph six, sentence four to read as follows: "Dispersion of the flow of water is effected by 346 nozzles in loop A and 344 nozzles in loop B, enhancing the condensation of water vapor in the containment volume and preventing overpressurization." Refer to Attachment 2, page 2 of 5 for a marked up copy of Bases page B 3/4 6-5.

JUSTIFICATION FOR PROPOSED CHANGE(S): The proposed change provides a correction to Bases 3/4.6.3 to indicate the actual number of spray nozzles in each loop of the RHR Containment Spray system. Rather than having 345 nozzles in each loop, PNPP's Containment Spray system's as-built configuration is 346 nozzles in loop A and 344 nozzles in loop B. The difference between the original design and final as-built configuration has been evaluated to have no significant affect on the operation of the RHR Containment Spray System or its ability to perform its safety function. As such, the proposed change constitutes a purely administrative change designed to correct an existing inconsistency in Bases 3/4.6.3.

- (3) BASES SECTION(S): 3/4.6.5.1, "Containment Vacuum Relief" and 3/4.6.5.2, "Containment Humidity Control."

PAGE NUMBER(S): B 3/4 6-6

DESCRIPTION OF PROPOSED CHANGE(S): The proposed change provides correction to a typographical error of the word "inadvertent" contained in paragraph 2, sentence 1 of Bases Section 3/4.6.5.1 and 3/4.6.5.2. Refer to Attachment 2, page 3 of 5 for a marked up copy of Bases page B 3/4 6-6.

JUSTIFICATION FOR PROPOSED CHANGE(S): The proposed change constitutes a purely administrative change designed to correct an existing typographical error in Bases Section 3/4.6.5.1 and 3/4.6.5.2.

- (4) BASES SECTION(S): 3/4.8.1, 3/4.8.2 and 3/4.8.3, "A.C. Sources, D.C. Sources and Onsite Power Distribution Systems."

PAGE NUMBER(S): B 3/4 8-1

DESCRIPTION OF PROPOSED CHANGE(S): The proposed change provides correction to a typographical error of the word "during" contained in paragraph 3, sentence 3 of Bases Section 3/4.8.1, 3/4.8.2 and 3/4.8.3. Refer to Attachment 2, page 4 of 5 for a marked up copy of Bases page B 3/4 8-1.

JUSTIFICATION FOR PROPOSED CHANGE(S): The proposed change constitutes a purely administrative change designed to correct an existing typographical error in Bases Section 3/4.8.1, 3/4.8.2 and 3/4.8.3.

- (5) BASES SECTION(S): 3/4.8.1, 3/4.8.2 and 3/4.8.3, "A.C. Sources, D.C. Sources and Onsite Power Distribution Systems."

PAGE NUMBER(S): B 3/4 8-2

DESCRIPTION OF PROPOSED CHANGE(S): The proposed change modifies paragraph six of Bases Section 3/4.8.1, 3/4.8.2 and 3/4.8.3 to state that the surveillance requirements for demonstrating the OPERABILITY of the unit batteries "meets the intent of" the recommendations of Regulatory Guide (RG) 1.129-1978 and IEEE Std 450-1980, rather than being "in accordance with" those recommendations, and to state that some surveillance intervals differ from those recommended in IEEE Std 450-1980 as discussed in USAR Table 1.8-1. Refer to Attachment 2, page 5 of 5 for a copy of marked up Bases page B 3/4 8-2.

JUSTIFICATION FOR PROPOSED CHANGE(S): The proposed change implements a commitment resulting from a recent Electrical Distribution System Functional Inspection (EDSFI) to provide clarification to the Technical Specification bases, since the current surveillance interval requirement of Technical Specification Surveillance Requirement 4.8.2.1.f is not strictly in accordance with the surveillance interval recommendations of IEEE Std 450-1980. IEEE Std 450-1980, Section 5.2 paragraph 3, recommends a 12-month (annual) Surveillance interval for the performance testing of battery capacity. Surveillance requirement 4.8.2.1.f specifies an 18-month surveillance interval for such performance testing of batteries. The proposed change will provide the necessary clarification that, since surveillance testing intervals may differ from those recommended in IEEE Std 450-1980, PNPP's surveillance requirements for maintenance, testing or replacement of Class 1E storage batteries "meet the intent of" the recommendations contained in the standard rather than being strictly "in accordance with" those recommendations. As such, the proposed change constitutes a purely administrative change designed to provide clarification and to achieve consistency between Bases 3/4.8.1, 3/4.8.2, and 3/4.8.3 and Technical Specification Surveillance Requirement 4.8.2.1.f.

Included for information as page 4 of 4 of Attachment 1 to this letter is a copy of the changed page from the Updated Safety Analysis Report (USAR) for PNPP. This USAR change has been made effective and was issued to controlled copy holders. The change will be incorporated into the text along with the next USAR update submittal to the NRC per 10 CFR 50.71(e).