

**PERRY NUCLEAR POWER PLANT**

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SENIOR VICE PRESIDENT  
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November 2, 1995  
PY-CEI/NRR-1978L

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, D. C. 20535

Perry Nuclear Power Plant  
Docket No. 50-440  
License Amendment Request: Revisions to the  
Onsite Power Distribution Specification

Gentlemen:

Amendment of the Facility Operating License (NPF-58) for the Perry Nuclear Power Plant (PNPP), Unit 1 is requested. This amendment requests revision to the Technical Specification (TS) for the Onsite Power Distribution Systems: TS 3/4.8.3.1, "Distribution - Operating." The proposed revision will remove the restriction currently placed on 120 volt buses EV-1-A and EV-1-B pertaining to the power supply to these buses in TS 3/4.8.3.1.

Attachment 1 provides the Summary, Description of the Proposed Changes, Safety Analysis, and Environmental Consideration. Attachment 2 is a copy of the marked-up TS page. Attachment 3 is a copy of the Significant Hazards Consideration.

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

Very truly yours,

for Donald C. Shelton

CS0:sc

Attachments

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


Operating Companies  
Cleveland Electric Illuminating  
Toledo Edison

070652

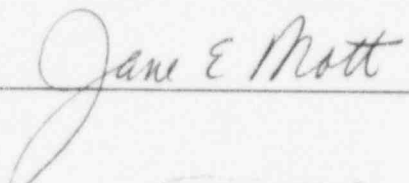
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I, Robert W. Schrauder, being duly sworn state that (1) I am Director, Perry Nuclear Services Department of the Cleveland Electric Illuminating Company, (2) I am duly authorized to execute and file this certification on behalf of The Cleveland Electric 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.

  
Robert W. Schrauder

Sworn to and subscribed before me, the 2<sup>nd</sup> day of November,  
1995.

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

## SUMMARY

This License Amendment Request proposes revisions to the Perry Nuclear Power Plant (PNPP) Technical Specification (TS) for the onsite power distribution systems; TS 3/4.8.3.1, "Distribution - Operating." The proposed revision will remove the restriction currently placed on 120 volt buses EV-1-A and EV-1-B pertaining to the power supply to these buses in TS 3/4.8.3.1.

## DESCRIPTION OF THE PROPOSED CHANGES

### Current Technical Specifications

TS 3/4.8.3.1 - Limiting Condition for Operation (LCO) items a.1.e and a.2.e are being revised to allow 120 volt AC buses EV-1-A and EV-1-B to be energized from either their inverter power supply or from their alternate power supply. For the EV-1-A bus, the alternate supply is the Class 1E bus EF-1-B-07, and for EV-1-B, the alternate supply is the Class 1E bus EF-1-D-09. In addition, the footnote \* is being deleted since the allowance given by the footnote is no longer required.

### Improved Technical Specifications

TS 3.8.7 - There are no proposed changes to the Technical Specifications or Bases in the improved Technical Specification format, because Amendment 69 (which will not be implemented until a later date) relocated the level of detail on the power supply for these buses to the Bases. The improved Technical Specification Bases provide a discussion on the issue addressed herein (see Bases for TS 3.8.7, in the Background Section).

## SAFETY ANALYSIS

TS 3/4.8.3.1 currently requires that the EV-1-A and EV-1-B buses be powered from their primary inverter power supplies. A footnote (footnote \*) to this requirement permits limited time on the alternate power supplies to perform equalizing charges on the associated batteries.

Both Division 1 and 2 have one 120 volt AC instrument bus whose design provides continuous power during postulated events including the loss of normal offsite power. These are the EV-1-A (Division 1) and EV-1-B (Division 2) buses. These buses provide power to the Average Power Range Monitors (APRMs), Local Power Range Monitors (LPRMs), and flow instruments used in the Reactor Protection System (RPS) for power-flow RPS signals. Credit is not taken in the accident analyses for having continuous power supplied to the instruments powered by these buses. Since a loss of power to the APRMs would generate a scram signal in the RPS and an APRM permissive signal in the Redundant Reactivity Control System (RRCS) logic, there is no need for inverter power to these instruments to ensure proper response to a loss of offsite power event. These instruments do not provide any input into Engineered Safety Feature (ESF) logic, therefore this inverter powered bus is not required to ensure proper ESF response. In addition, the alternate power supply to these buses are Class 1E diesel-backed power providing a reliable source of power. As such, although current Technical

Specification LCO 3.8.3.1 requires these buses to be energized from their respective inverters, there is no need per the PNPP safety analyses or per the ESF, RPS and RRCS logic for these buses to maintain continuous power during a loss of offsite power event.

In a related issue, by letter dated February 7, 1994 (PY-CEI/NRR-1669L), the results of the review performed for PNPP in accordance with NEDO-31558, "Position on NRC Regulatory Guide 1.97, Revision 3, Requirements for Post-Accident Neutron Monitoring Systems" was documented. The NEDO proposed alternate criteria for neutron flux monitoring instrumentation in lieu of the Category 1 criteria stated in the Regulatory Guide. On February 23, 1994, the NRC staff completed review of this submittal and concluded that the PNPP post-accident neutron flux monitoring instrumentation meets the criteria of NEDO-31558 as an acceptable alternative to the guidance in Regulatory Guide (RG) 1.97. The NRC staff also indicated that it was acceptable to remove neutron flux from PNPP's RG 1.97 Type A variable list, i.e., the APRMs (which are normally powered from the inverters discussed above), are not instruments providing primary information needed to permit the operator to take specific manually controlled actions following design basis events.

Attachment 1 to letter PY-CEI/NRR-1669L (pages 5 and 6) specifically discussed the power supplies to the APRMs. The conclusion of the NEDO-31558 review was that although availability of the APRMs post-accident would enhance operator actions, the function was not essential to ensure plant safety. It follows that if the complete loss of APRM function post-accident will not compromise plant safety, then powering the APRMs from the diesel-backed buses rather than from an inverter-backed bus is acceptable.

Based on the determination that a loss of offsite power while on the alternate power supplies will not compromise plant safety, it is concluded that the present Technical Specification restrictions are overly conservative. The proposed change would permit either the normal inverter power supply, or the alternate Class 1E power supply to energize the EV-1-A and EV-1-B buses. Thus, the proposed change eliminates the need to perform a plant shutdown if the EV-1-A or EV-1-B buses are energized from their alternate power source (outside of the flexibility given by footnote \*). Since the proposed change would allow the buses to be powered from their alternate power supplies, footnote \* is also proposed to be deleted, since it is no longer applicable.

As noted above, the improved Technical Specifications for PNPP have specifically addressed this issue. The Bases for TS 3.8.7 make it clear that "having one or both of these buses powered from their alternate supplies for even extended periods of time would not result in a decrease in safety." This issue was specifically reviewed by the NRC in the development of the improved Technical Specifications, through review of a supplemental submittal dated November 7, 1994 (PY-CEI/NRR-1880L). Documentation of the NRC review was provided in the Safety Evaluation accompanying Amendment 69, on page 133.

ENVIRONMENTAL CONSIDERATION

The proposed Technical Specification change request was evaluated against the criteria of 10 CFR 51.22 for environmental considerations. The proposed change does not increase the types and amounts of effluents that may be released offsite, nor does it significantly increase individual or cumulative occupational radiation exposures. As discussed above and in Attachment 3, it also does not involve a significant hazards consideration. 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 a categorical exclusion from the requirement for an Environmental Impact Statement.