



**PERRY NUCLEAR POWER PLANT**

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**Donald C. Shelton**  
SENIOR VICE PRESIDENT  
NUCLEAR

January 26, 1996  
PY-CEI/NRR-2015L

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Perry Nuclear Power Plant  
Docket No. 50-440  
Additional Information to Support License Amendment Request:  
Fuel Handling Accident Reanalysis

Gentlemen:

In a meeting with Nuclear Regulatory Commission (NRC) staff on January 4, 1996, information was provided regarding a recent request for amendment of the Facility Operating License for the Perry Nuclear Power Plant (PNPP) Unit 1. The request was submitted by letter dated November 2, 1995 (PY-CEI/NRR-1995L), and involves Technical Specification (TS) requirements for handling of irradiated fuel in the Containment or the Fuel Handling Building, and certain TS requirements related to core alterations. The proposed changes are based on analysis of the postulated fuel handling and core alteration accidents and transients for PNPP. During the meeting, emphasis was placed on the regulatory basis supporting the changes, and the overall outage safety benefits that could be realized following issuance of the requested changes.

In subsequent telephone calls on January 11 and 18, 1996, the NRC staff provided feedback indicating that only a portion of the proposed changes would be issued in the near term, with the remainder deferred for further review. The portion proposed for issuance involves only the TS changes associated with the primary containment air locks. In conjunction with issuance of this portion of the change, the staff requested that a commitment be docketed to ensure that appropriate administrative controls would be in place, providing for prompt closure capability of a door in an open air lock penetration, should it become necessary. The staff requested that this commitment be submitted in the form of a License Condition, to be included in the body of the Operating License. The requested commitment specific to opening of air lock penetrations is included as an attachment to this letter in the form of an Operating License Condition.

It should be noted that the existing Technical Specification controls on minimum water levels over irradiated fuel and on OPERABILITY of ventilation systems are not being revised by this proposed License Amendment.

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Operating Companies  
Cleveland Electric Illuminating  
Toledo Edison

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The portion of the original request which is being issued (consisting of changes to only the air lock Technical Specification and the License Condition) retains Technical Specification controls over the mitigation systems credited in the original analyses in order to maintain offsite doses within Standard Review Plan guidance for Fuel Handling Accidents. When considering such a design basis Fuel Handling Accident, the current proposal would be considered more conservative than that analyzed and found to be acceptable in the Significant Hazards Consideration accompanying the November 2, 1995 request. Therefore, the previously submitted Significant Hazards Consideration would bound the current proposal, and submittal of a new Significant Hazards Consideration is not necessary.

NRC review of the deferred changes is requested in a timely manner, to support outage planning efforts for the sixth refuel 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,




for Donald C. Shelton

BSF:bf

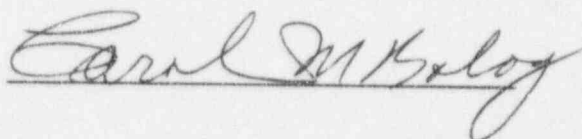
Attachment

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

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 26<sup>th</sup> day of January,  
1996.



CAROLINE M. BALOG  
Notary Public, State of Ohio  
My Commission expires May 23, 2000  
(recorded in Lake County)

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(7) Detailed Control Room Design Review (Section 18, SSER #10)

CEICO shall implement the remaining activities to complete the Detailed Control Room Design Review and correct all human engineering discrepancies (HED's) identified in Attachment 1. Attachment 1 is hereby incorporated into this license.

(8) Emergency Planning (Section 13.3, SSER #10)

In the event that the NRC finds that the lack of progress in completion of the procedures in the Federal Emergency Management Agency's final rule (44 CFR Part 350) indicates that a major substantive problem exists in achieving or maintaining an adequate state of emergency preparedness, the provisions of 10 CFR 50.54(s)(2) will apply.

## (9) Deleted

*See Insert*

- D. CEICO is exempted from: 1) the requirements of Section III.D.2(b)(ii), containment airlock testing requirements, Appendix J to 10 CFR Part 50, due to the special circumstance described in Section 6.2.6 of SER Supplement No. 7 authorized by 10 CFR 50.12(a)(2)(iii); and 2) the requirements of Section IV.F., Full Participation Exercise, of Appendix E to 10 CFR Part 50, due to the special circumstance described in the Exemption, dated November 6, 1986. These exemptions are authorized by law, will not present an undue risk to the public health and safety and are consistent with the common defense and security. The exemptions are hereby granted pursuant to 10 CFR 50.12. With the granting of these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.
- E. CEICO shall fully implement and maintain in effect all provisions of the physical security, guard training and qualification, and safeguards contingency plans previously approved by the Commission and all amendments and revisions to such plans made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Perry Nuclear Power Plant Security Plan", with revisions submitted through May 15, 1986; "Perry Nuclear Power Plant Security Force Training and Qualification Plan", with revisions submitted through August 12, 1986; and "Perry Nuclear Power Plant Safeguards Contingency Plan" (Chapter 8 of the Security Plan), with revisions submitted through May 15, 1986.

**INSERT to Operating License Page 5**

(10) Primary Containment air lock penetrations may be open during CORE ALTERATIONS and movement of irradiated fuel within the primary containment, except when moving recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous seven days), provided the following conditions exist:

- One door in each air lock is capable of being closed.
- Hoses and cables running through the air lock employ a means to allow safe, quick disconnect or severance, and are tagged at the air lock with specific instructions to expedite removal.
- The air lock door is not blocked in such a way that it cannot be expeditiously closed.
- A designated individual is available to expeditiously close the air lock door.