



PERRY NUCLEAR POWER PLANT

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

Perry Nuclear Power Plant
Docket No. 50-440
Technical Specification Change
Request: Relocation of Component Lists

Gentlemen:

Enclosed is a request for amendment of Facility Operating License NPF-58 for the Perry Nuclear Power Plant (PNPP) Unit 1.

This Amendment Request proposes to relocate the component lists from Sections 3.6.4 and 3.8.4.1 of the PNPP Unit 1 Technical Specifications (TS) pursuant to the guidelines set forth in NRC Generic Letter 91-08, "Removal of Component Lists from Technical Specifications." The subject lists will be incorporated into PNPP's Operations Manual and will be subject to the change control provisions for procedures as described in the Administrative Controls Section of the TS.

Also included in this Amendment Request are corresponding changes to the Bases section of PNPP Technical Specifications which are provided for information and incorporation, although as noted in 10 CFR 50.36(a), the Bases are not considered a formal part of the Technical Specifications.

A summary of the proposed changes, a Safety Assessment and the Significant Hazards and Environmental Considerations are provided in Attachment 1. Attachment 2 provides a copy of the marked up Technical Specification pages.

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

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

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I. SUMMARY

On May 6, 1991, the Nuclear Regulatory Commission issued Generic Letter (GL) 91-08, "Removal of Component Lists From Technical Specifications." The GL provided guidance for preparing a request for a license amendment to relocate component lists from Technical Specifications (TS) into appropriate plant procedures. The guidance included incorporating the component lists into plant procedures that are subject to the change control provisions in the Administrative Controls Section of the TS. This will provide an acceptable alternative to identifying every component by its plant identification number as it is currently listed in the tables of TS. The change control provisions of the TS provide an adequate means to control changes to these component lists, with it including them in TS. The removal of these component lists is acceptable because it does not alter existing TS requirements or those components to which they apply. The nuclear industry and U.S. Nuclear Regulatory Commission (NRC) identified this line-item TS improvement during investigations of TS concerns.

In accordance with the guidelines provided by the NRC staff in GL 91-08, this Amendment Request proposes to relocate the component lists for (1) Containment Isolation Valves and (2) Containment Penetration Conductor Overcurrent Protection Devices, from the PNPP Unit 1 Technical Specifications and incorporate them into the PNPP Operations Manual Volume 18 (PNPP's Plant Data Book). The subject lists will thereafter be controlled as if they are a procedure in accordance with the change control provisions for procedures contained in PNPP Technical Specification Sections 6.5.3 and 6.8, which are subsections of the Administrative Controls Section (Section 6.0). Current Technical Specification administrative controls for procedures include: review of changes to the subject lists for unreviewed safety questions in accordance with the provisions of 10CFR50.59, review and approval by the Plant Operations Review Committee (PORC) and approval by the General Manager, Perry Nuclear Power Plant Department (PNPPD). Currently the list of Containment Isolation Valves is found in TS Section 3.6.4, Table 3.6.4-1, and the list of Containment Penetration Conductor Overcurrent Protective Devices is found in TS Section 3.8.4.1, Table 3.8.4.1-1. In addition to removing the subject component lists, this proposed amendment will modify portions of the TS that specifically reference these lists. Certain footnotes to the present TS lists that modify the TS requirements will also be incorporated into the applicable TS Limiting Condition For Operation. A description of the proposed changes is provided below. A copy of the marked up TS pages is included in Attachment 2.

II. DESCRIPTION OF PROPOSED CHANGES

- A. TS Definition 1.33, "Primary Containment Integrity" (page 1-6), is modified consistent with the guidance of GL 91-08 to (1) remove the reference to Table 3.6.4-1 and (2) add a statement which identifies that certain valves may be opened as permitted by Specification 3.6.4 while maintaining Primary Containment Integrity. Refer to Attachment 2 page 1 for a copy of TS Definition 1.33, as modified.

Note that the variation in wording from that recommended in GL 91-08 (no specific mention here in Definition 1.33 of the "administrative controls") is necessary to avoid a conflict with a pre-existing exception contained in Footnote (k) of Table 3.6.4-1, while still accomplishing the intent of the Generic Letter. See Section II.D below for further explanation of this difference from the Generic Letter guidance.

- B. TS Table 3.3.2-1, "Isolation Actuation Instrumentation" (pages 3/4 3-11 through 3/4 3-14, and 3/4 3-16), is revised to remove information cross-referencing the Isolation Actuation Instrumentation to TS Table 3.6.4-1 which will be relocated to PNPP's Plant Data Book in the manner described previously. This requires removal of one column from the table ("Valve Groups Operated By Signal") as well as deletion of several informational footnotes (footnotes b, c, d, e, f, h, i and j). Refer to Attachment 2 pages 2 through 6 for a copy of TS Table 3.3.2-1, as revised.
- C. TS Table 3.3.2-3, "Isolation Actuation Instrumentation Response Time" (page 3/4 3-22), footnote (#) is revised to remove references to isolation times currently contained in Table 3.6.4-1, which will be relocated to PNPP's Plant Data Book in the manner described previously. Refer to Attachment 2 page 7 for a copy of TS Table 3.3.2-3, as revised.
- D. Surveillance Requirements 4.6.1.1.1.b and 4.6.1.1.2.a, "Primary Containment Integrity-Operating" (page 3/4 6-1), and "Shutdown" (page 3/4 6-2) respectively, are modified to remove references to Table 3.6.4-1, while preserving provisions allowing certain valves to be opened as permitted by Specification 3.6.4. Refer to Attachment 2 pages 8 and 9 for a copy of Surveillance Requirements 4.6.1.1.1.b and 4.6.1.1.2.a, as modified.

Note that the variation in wording for Surveillance Requirement 4.6.1.1.2.a from that recommended in GL 91-08 (no specific mention of the "administrative controls") is necessary to avoid a conflict with a pre-existing exception contained in Footnote (k) of Table 3.6.4-1, while still accomplishing the intent of the Generic Letter. The Footnote (k) provision allows the Fire Protection system manual hose reel containment isolation valves 1P54-F726 and -F727 to be opened as necessary to supply fire mains in OPERATIONAL CONDITION ** (when handling irradiated fuel in the primary containment and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel) without the additional requirement for the type of administrative controls that are being defined in the new paragraph being added to Bases Section 3/4.6.4. This existing exception has been retained and incorporated into Specification 3.6.4, as revised (see Section II.F.3.c below). The lack of mention of the "administrative controls" here in the Primary Containment Integrity-Shutdown Specification has no impact since Surveillance Requirement 4.6.1.1.2.a specifically references Specification 3.6.4, and Specification 3.6.4 provides the requirements for administrative controls for the cases in which they are appropriate (locked or

sealed closed valves). Although no corresponding conflict exists for Surveillance Requirement 4.6.1.1.1.b since it is applicable when the plant is in Operational Condition 1, 2 or 3, no mention of administrative controls is made in 4.6.1.1.1.b either, in order to be consistent with 4.6.1.1.2.a and with the revised Definition 1.33 (see Section II.A above).

- E. TS 3.6.1.2, "Primary Containment Leakage" (pages 3/4 6-3 through 3/4 6-5), and associated Surveillance Requirement 4.6.1.2 are revised to remove references to Table 3.6.4-1. Refer to Attachment 2 pages 10, 11 and 12 for a copy of TS 3.6.1.2 and associated Surveillance Requirement 4.6.1.2, as revised.
- F. TS 3.6.4 "Containment Isolation Valves" (pages 3/4 6-28 and 3/4 6-29) is revised as follows:
1. All references to Table 3.6.4-1 are removed. This table is being relocated to PNPP's Plant Data Book as described previously.
 2. LCO 3.6.4 is revised to remove reference to required valve isolation times. Isolation times will be relocated to the Plant Data Book along with other information from Table 3.6.4-1. The isolation times will continue to be verified per the requirements of TS 4.0.5 (Inservice Testing).
 3. Footnote (#) is added to include provisions currently allowed under Table 3.6.4-1, Footnotes (i), (j) and (k), and to include reference to the locked or sealed closed containment isolation valves which are permitted to be opened under administrative controls in accordance with the guidelines contained in Generic Letter 91-08. Include within Footnote (#) are the following provisions:
 - a. A provision providing that Containment Vessel and Drywell Purge System 42-inch inboard purge valves 1M14-F045 and -F085 are not required to be OPERABLE in OPERATIONAL CONDITION 1, 2 and 3. This provision was previously allowed by Table 3.6.4-1, Footnote (j).
 - b. A provision providing that RCIC system containment isolation valves are not required to be OPERABLE in OPERATIONAL CONDITION ** (when handling irradiated fuel in the primary containment, during CORE ALTERATIONS and operations with a potential for draining the reactor vessel). This provision was previously allowed by Table 3.6.4-1, Footnote (i).
 - c. A provision allowing Fire Protection system manual hose reel containment isolation valves 1P54-F726 and -F727 to be opened as necessary to supply fire mains in OPERATIONAL CONDITION (**). This provision was previously allowed by Table 3.6.4-1, Footnote (k).

d. A provision allowing locked closed or sealed closed containment isolation valves to be opened on an intermittent basis under administrative controls, consistent with the guidelines contained in GL 91-08. This provision applies to valves that are normally locked closed or sealed closed consistent with design requirements of General Design Criteria (GDC) 55, 56 and 57 of Appendix A to 10 CFR Part 50. This provision applies to valves, the design of which contain positive control features to ensure that they are maintained closed.

4. Surveillance Requirements 4.6.4.1, 4.6.4.2, and 4.6.4.3 are revised, as recommended by GL 91-08, to include the word "containment" when referring to isolation valves, and to remove all references to Table 3.6.4-1.

Refer to Attachment 2 pages 13 through 15 for a copy of TS 3.6.4, as revised.

G. Table 3.6.4-1 "Containment Isolation Valves" (pages 3/4 6-30 through 3/4 6-39) is deleted in its entirety. The information from Table 3.6.4-1 will be incorporated into PNPP's Plant Data Book. The relocation will include all the Table information with the exception of Footnotes (i), (j) and (k), which are retained as described above (see Section II.F.3).

Refer to Attachment 2, pages 16 through 26 for a copy of TS Table 3.6.4-1, as deleted.

H. Bases Section 3/4.6.4 "Containment Isolation Valves" (page B 3/4 6-5) is revised to note that the containment isolation valve table is listed in PNPP's Plant Data Book, and to include a clarification of those actions which constitute "administrative controls" as used in TS 3.6.4, Footnote (#), for locked or sealed closed containment isolation valves which are permitted to be opened under "administrative controls." Both of these changes are recommended by GL 91-08. Refer to Attachment 2 pages 27 and 28 for a copy of Bases Section 3/4.6.4, as revised.

I. TS 3.8.4.1, "Containment Penetration Conductor Overcurrent Protective Devices" (page 3/4 8-21) and associated Surveillance Requirements 4.8.4.1 are revised as follows:

1. All references to Table 3.8.4.1-1 are removed. This table is being relocated to PNPP's Plant Data Book as described previously.
2. The wording of the LCO and associated Surveillance Requirements is modified to provide the appropriate description of the scope of the protective devices to which the requirements apply.

Wording is consistent with that recommended in Generic Letter 91-08. Refer to Attachment 2 page 29 for a copy of TS 3.8.4.1 and associated Surveillance Requirement 4.8.4.1, as revised.

- J. Table 3.8.4.1-1 "Containment Penetration Conductor Overcurrent Protective Devices" (pages 3/4 8-23 and 3/4 8-24), will be relocated to PNPP's Plant Data Book as described previously. Refer to Attachment 2 pages 30 through 32 for a copy of Table 3.8.4.1-1, as deleted.
- K. Bases Section 3/4.8.4 "Electrical Equipment Protective Devices" (page B 3/4 8-3), is revised to reference PNPP's Plant Data Book for the list of required electrical penetration protective circuit breakers. Refer to Attachment 2, page 33 for a copy of Bases Section 3/4.8.4, as revised.

III. SAFETY ASSESSMENT

This Amendment Request proposes changes to the Perry Nuclear Power Plant (PNPP) Unit 1 Technical Specification (TS) to remove the component lists for (1) Containment Isolation Valves from TS Section 3.6.4 and (2) Containment Penetration Conductor Overcurrent Protective Devices from TS Section 3.8.4.1.

The proposed TS changes follow the explicit guidance and recommendations set forth in Generic Letter 91-08, "Removal of Component Lists From Technical Specifications." The nuclear industry and the U.S. Nuclear Regulatory Commission identified this line-item TS improvement during investigations of TS problems. The proposed amendment removes the aforementioned lists from the PNPP Unit 1 TS and includes them into the Plant Data Book where they will be controlled as if they are a procedure. This information will be adequately controlled via the administrative requirements for procedures specified in the Administrative Controls Section of the PNPP Unit 1 TS, subsections 6.5.3 and 6.8. Those requirements include review of the changes for unreviewed safety questions in accordance with the provisions of 10CFR50.59, review and approval by the Plant Operations Review Committee (PORC) and approval by the Perry Nuclear Power Plant Department (PNPPD) General Manager. Minor variations in the wording recommended in GL 91-08 are described in Section III and are only those necessary to accommodate the plant specific features of the PNPP Unit 1 Technical Specifications. The removal of component lists is acceptable because it does not alter existing TS requirements or those components to which they apply. The proposed changes to the TS serve only to clarify the scope of the equipment covered by the TS as directed by the Generic Letter. These changes therefore constitute an administrative revision only. The plant licensing basis, in concert with Title 10 of the Code of Federal Regulations, actually dictates which components the TS requirements apply to. Therefore, we conclude that the proposed removal of the component lists from TS is acceptable.

IV. SIGNIFICANT HAZARDS CONSIDERATION

The standards used to arrive at a determination that a request for amendment involves no significant hazards considerations are included in the Commission's Regulations, 10 CFR 50.92, which state that the operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any previously evaluated, or (3) involve a significant reduction in a margin of safety.

The proposed amendment has been reviewed with respect to these three factors and it has been determined that the proposed changes do not involve a significant hazard because:

1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes would result in the revision or deletion of specified tables from the TS, as well as modification of TS and Bases wording as recommended by Generic Letter 91-08. The component lists affected are (1) Containment Isolation Valves (Table 3.6.4-1) and (2) Containment Penetration Conductor Overcurrent Protective Devices (Table 3.8.4.1-1). In addition, Tables 3.3.2-1 and 3.3.2-3, along with the wording of a TS Definition, and several LCOs, Surveillance Requirements, and Bases are modified to reflect administrative changes resulting from removal of specific references to the deleted component tables.

Removal of the subject component lists from the TS will not alter the existing TS requirements nor change the components to which they apply. Surveillance and operability requirements are incorporated into the TS to ensure that these components are available to perform their design functions. The restrictions and actions imposed by these requirements are not being relaxed or revised by the proposed changes in any way. The requirements for primary containment integrity and Type B and C testing will remain the same. The only changes made to the language of the TS are those recommended by GL 91-08 to ensure that the scope of each specification is clear and any plant specific features are retained. Accident analyses which rely on these components are not affected. There will be no modifications to plant equipment nor any physical changes to the licensed facility as a result of the proposed changes. Plant procedures/instructions will be revised only as necessary to reflect relocation of the table information. Any changes to the subject component information moved to the Plant Data Book will be accomplished in accordance with the administrative controls required by TS subsections 6.8 and 6.5.3 for plant procedures. The editorial changes to the TS will not affect the possibility or consequences of an accident in any way. Therefore, the proposed changes do not involve a change in the probability or consequences of an accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated.

The removal of component lists will not alter existing TS requirements or those components to which they apply. The relocation of information from TS tables into the Plant Data Book serves only to consolidate information on affected components outside of the TS for control under appropriate administrative requirements. This is done in accordance with the guidance of GL 91-08. The proposed revisions to the TS do not involve a change in the manner in which these components will be operated, maintained, or monitored. No components or systems are physically added, removed, or modified as a result of the proposed changes. Therefore, no physical changes are being made to the facility as a result of the removal of the component lists. Since the requirements for the components will remain the same, this proposed amendment will not affect the outcome of previously evaluated accidents. Therefore, this proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated.

3. The proposed amendment does not involve a significant reduction in the margin of safety.

The removal of the component lists from TS will not alter the existing TS requirements nor result in any changes to the components to which they apply. The proposed changes are consistent with the guidance set forth in GL 91-08. The margin of safety associated with these component lists is unaffected by this proposed change since the operability and surveillance requirements applicable to these components are not being revised except administratively as recommended by the Generic Letter. The component lists will be incorporated into PNPP's Plant Data Book and will be subject to the change control provisions for plant procedures in the Administrative Controls Section of the TS. Any changes made to the subject component lists will be reviewed in accordance with the controls of TS subsections 6.5.3 and 6.8, which allow no decrease in the margin of safety without prior NRC approval. Since the same components are subject to the same requirements, the margin of safety is not affected. The editorial changes made to refine the TS will not affect the margin of safety. Consequently, the proposed amendment does not involve a significant reduction in the margin of safety.

VI. ENVIRONMENTAL CONSIDERATION

The proposed Technical Specification change request has been reviewed against the criteria of 10 CFR 51.22 for environmental considerations. As shown above, the proposed change does not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor 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 a categorical exclusion from the requirement for an Environmental Impact Statement.