



PERRY NUCLEAR POWER PLANT

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United States Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Perry Nuclear Power Plant
Docket No. 50-440
License Amendment Request: Proposed Changes
to the Improved Technical Specifications


Gentlemen:

Amendment of the Facility Operating License (NPF-58) for the Perry Nuclear Power Plant (PNPP) Unit 1 is requested. The proposed changes only affect material in the improved Technical Specifications (Amendment 69) and are either administrative in nature or reflect minor technical errors discovered during the implementation process. Since only the improved Technical Specifications are involved, no changes to the current Technical Specifications are requested. It is requested that the changes be approved by June 17, 1996 to support implementation concurrent with the final implementation of Amendment 69.

Attachment 1 provides a Description of Proposed Changes, a Safety Analysis, and an Environmental Consideration. Attachment 2 provides a copy of the marked-up improved Technical Specification pages. Attachment 3 provides the Significant Hazards Consideration. Attachment 4, the revised Table of Contents, is provided only for your information. The Table of Contents for the Technical Specifications and the Bases will be controlled on site.

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

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Attachments PDR ADOCK 05000440
P PDR

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

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

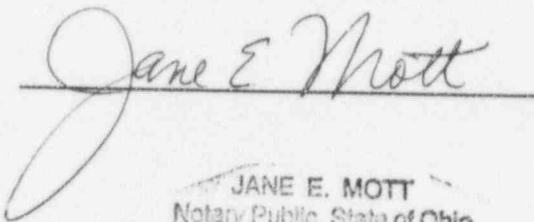
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I, Robert W. Schrauder, being duly sworn state that (1) I am Director, Perry Nuclear Services Department of the Cleveland Electric Illuminating Company, (2) I am duly authorized to execute and file this certification on behalf of The Cleveland Electric 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 26th day of April, 1996.


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

CODED/8838/sc

SUMMARY

This License Amendment Request proposes several minor revisions to the Perry Nuclear Power Plant (PNPP) improved Technical Specifications (ITS). These are based on reviews conducted during the implementation phase of the ITS. No changes to the current Technical Specifications are proposed.

DESCRIPTION OF CHANGE AND SAFETY ANALYSIS

This Amendment Request proposes changes which affect the improved Technical Specifications (ITS) (Amendment 69). The proposed changes have been determined not to involve significant hazards consideration in accordance with previously published NRC guidance (51 FR 7751, March 6, 1986). A Summary and Safety Analysis of each proposed change is provided below.

It should be noted that since Amendment 69 has not yet been completely implemented at PNPP, the proposed changes have no effect on the current operation of the plant. Implementation of these proposed changes will occur simultaneously with the final implementation of Amendment 69.

Table 3.3.2.1-1 "Control Rod Block Instrumentation", Function 1.b (page 3.3-19)

Table 3.3.6.1-1 "Primary Containment and Drywell Isolation Instrumentation",
Function 2.a (page 3.3-54)

Table 3.3.6.1-1 "Primary Containment and Drywell Isolation Instrumentation",
Functions 2.a, 2.b, 2.c, and 2.g (page 3.3-55)

Table 3.3.6.1-1 "Primary Containment and Drywell Isolation Instrumentation",
Function 2.h (page 3.3-56)

Table 3.3.6.1-1 "Primary Containment and Drywell Isolation Instrumentation",
Functions 5.a and 5.b (page 3.3-59)

Proposed Change:

Increase font size of superscript.

Justification:

Increasing the font size is a human factors improvement which will make the text more legible.

Table 3.3.5.1-1 "Emergency Core Cooling System Instrumentation" (page 3.3-41)

Proposed Change:

Change footnote (b) to a new footnote (e) worded as follows: "Also required to initiate the associated diesel generator." Change the use of footnote (b) on the page for Functions 3a and 3b to the new footnote (e).

Justification:

The functions (3.a, Reactor Vessel Water Level - Low Low, Level 2 and 3.b, Drywell Pressure - High) to which footnote (b) is applied are associated with the Division 3 High Pressure Core Spray (HPCS) System instrumentation. There is no interface between the HPCS System instrumentation and the Annulus Exhaust Gas Treatment System. Thus, the addition of footnote (e) is required.

Footnote (b) is used correctly in the remainder of Table 3.3.5.1-1, when reference is made to Division 1 and Division 2 Emergency Core Cooling System instrumentation which does interface with the Annulus Exhaust Gas Treatment System.

Table 3.3.6.1-1 "Primary Containment and Drywell Isolation Instrumentation",
Footnote (g) (page 3.3-59)

Proposed Change:

Add the words "vessel" and "pressure" into the footnote.

Justification:

The new footnote will use terminology consistent with that used elsewhere in the ITS. See, for example, footnote (e) on the same page.

Specification 3.4.10, Required Action B.1 (page 3.4-25)

Proposed Change:

Change "circulating" to "circulation".

Justification:

Change is made for consistency with similar Actions elsewhere in the ITS. See, for example, the Completion Time for the referenced Required Action.

Specification 3.4.11, SR 3.4.11.8 (page 3.4-30)

Proposed Change:

Add "coolant" between "RPV" and "temperature".

Justification:

Change is made for consistency with similar Surveillance Requirements elsewhere in the ITS. See, for example, SR 3.4.11.9 on the same page.

Specification 3.6.1.2, Condition E (page 3.6-6)

Specification 3.6.1.12, Condition C (page 3.6-35)

Proposed Change:

Add "during" (page 3.6-6).

Add "during" (page 3.6-35).

Change "and" to "or during" (page 3.6-35).

Justification:

Change is made for consistency with similar Conditions elsewhere in the ITS. See, for example, Condition D on page 3.6-55.

Specification 3.1.7, Condition B (page 3.1-20)

Table 3.3.2.1-1 "Control Rod Block Instrumentation", Function 1.a (page 3.3-19)

Table 3.3.3.1-1 "Post Accident Monitoring Instrumentation", Function 10
(page 3.3-23)

Specification 3.4.1, LCO a (page 3.4-1)

Specification 3.6.1.12, Conditions B and C (page 3.6-35)

Specification 3.6.3.2, SR 3.6.3.2.4 (page 3.6-48)

Specification 3.6.5.3, Required Action A.1 (page 3.6-65)

Specification 3.6.5.3, Required Action B.1 (page 3.6-66)

Specification 3.7.9, SR 3.7.9.2 (page 3.7-18)

Specification 3.8.1, SR 3.8.1.9 (page 3.8-8)

Specification 3.8.1, SR 3.8.1.10 (page 3.8-8)

Specification 3.8.1, SR 3.8.1.12 (page 3.8-10)

Specification 3.8.1, SR 3.8.1.20 (page 3.8-15)

Specification 3.8.5, LCO and LCO c (page 3.8-28)

Specification 3.8.5, Required Action A.2.2 (page 3.8-30)

Specification 4.3, item 4.3.1.2.a, (page 4.0-2)

Specification 5.1.1, second paragraph (page 5.0-1)

Specification 5.5.5, (page 5.0-9)

Specification 5.5.7.d, (page 5.0-12)

Proposed Changes:

Move "inoperable" to the right to line up properly on page 3.1-20.

Line up the function horizontally with the other material for that function on pages 3.3-19 and 3.3-23.

Move "Either" to the left and "a" down on page 3.4-1.

Insert a line between Conditions B and C on page 3.6-35.

Change "inaccessible" to "accessible" on page 3.6-48.

Change "close" to "closed" on page 3.6-65.

Insert "closed manual valve," and change "chinch valve" to "check valve" and "value" to "valve" on page 3.6-66.

Capitalize the first letter of "program" on page 3.7-18.

Insert "a load" in the first sentence of SR 3.8.1.9 on page 3.8-8.

Delete Note 1 of SR 3.8.1.10 and remove the number from the other Note on page 3.8-8. Realign text under "NOTE".

Insert "and" after the semicolon of part b, and change the semicolon at the end of part c to a period for SR 3.8.1.12 on page 3.8-10.

Delete "A" from the third line of SR 3.8.1.20 on page 3.8-15.

For Specification 3.8.5: delete leading space in the LCO: insert "power" in LCO c between "electrical" and "distribution"; add a comma in LCO c between "subsystem" and "when" on page 3.8-28.

Delete second occurrence of "Required Action A.2.2 AND" on page 3.8-30.

Add "and" after semicolon at the end of 4.3.1.2.a on page 4.0-2.

Add comma between "test" and "experiment" in the second line of the second paragraph on page 5.0-1.

Add "the" before "reactor vessel" on page 5.0-9.

Delete extra space after "30,000 sfc" in 5.5.7.d item (a) on page 5.0-12. Change "sfc" to "scf" for items (a), (b), and (c) in 5.5.7.d.

Justification:

These are obvious typographical errors. The majority of these corrections reflect material submitted in previous letters to the NRC (PY-CEI/NRR-1732L (dated 12/16/93), PY-CEI/NRR-1880L (dated 11/7/94), and PY-CEI/NRR-1944L (dated 5/5/95)), it was confirmed that these are typographical errors introduced during the final typing of the Specifications.

Specification 3.6.5.3, SR 3.6.5.3.2 (page 3.6-67)

Specification 3.6.1.3, SR 3.6.1.3.13 (page 3.6-19)

Proposed Change:

Move the requirements of SR 3.6.5.3.2 to new SR 3.6.1.3.13. Add "Deleted." to existing SR 3.6.5.3.2.

Justification:

During reviews of the improved Technical Specifications for implementation preparation, it was determined that the surveillance requirement for the Backup Hydrogen Purge System valves had incorrectly been located in the Drywell Isolation Valve Limiting Condition for Operation (LCO) instead of the Primary Containment Isolation Valve LCO. These valves are primary containment isolation valves. In the current Technical Specifications, the requirements for these valves are listed in both the LCO for Drywell and Containment Purge (LCO 3/4.6.1.8) and the LCO for Containment Isolation Valves (LCO 3/4.6.4). As part of the conversion process to the ITS format, LCO 3/4.6.1.8 was deleted and the various requirements placed in either the Primary Containment Isolation Valve LCO (LCO 3.6.1.3), or the Drywell Isolation Valve LCO (LCO 3.6.5.3) as applicable. The requirements for the Backup Hydrogen Purge System isolation valves were incorrectly placed in the Drywell Isolation Valve LCO. Placing the requirements in the Primary Containment LCO will assure proper actions are taken for inoperable or incorrectly open Backup Hydrogen Purge System isolation valves.

Specification 3.7.3, Condition B (page 3.7-4)

Specification 3.7.4, Condition C (page 3.7-8)

Specification 4.3, item 4.3.1.1.c (page 4.0-2)

Proposed Change:

Make the first letter of "Associated" lower case (pages 3.7-4 and 3.7-8).

Change "within" to "with" (page 4.0-2).

Justification:

These changes are proposed in accordance with the accepted capitalization format used throughout the ITS.

As the sentence is written, "within" is obviously not the intended word.

These errors existed in the original NUREG-1434 and were not previously detected.

Specification 3.8.1, SR 3.8.1.4 (page 3.8-6)

Proposed Change:

Change "... ≥ 295 gallons ..." to "... ≥ 316 gallons ..." and "... ≥ 260 gallons ..." to "... ≥ 279 gallons ...".

Justification:

These more conservative diesel generator fuel oil day tank minimum volumes are the result of new design calculations performed during the implementation process. The new calculations account for instrument uncertainties to ensure that the drawdown in the fuel oil day tank due to diesel generator secondary fuel oil transfer pump start does not reach the pump shutoff point. This action will increase the reliability of the diesel generator fuel oil transfer pumps.

Specification 5.3.1, Unit Staff Qualifications (page 5.0-4)

Proposed Change:

Change to: "... Regulatory Guide 1.8, September 1975, and the licensed Reactor Operators and Senior Reactor Operators, who shall comply with the requirements of 10 CFR 55."

Justification:

The change incorporates a change made to the current Technical Specifications by Amendment 70 which was not reflected in the improved Technical Specifications issued under Amendment 69.

Specification 5.7.3, High Radiation Area (page 5.0-20)

Proposed Change:

Change from "cannot be" to "are not".

Justification:

This change is being made to clarify instances when an individual high radiation area shall be barricaded, conspicuously posted, and have an activated flashing light as a warning device. Presently the wording states these measures are needed, in part, when high radiation areas "cannot be" continuously guarded. This phraseology can be misinterpreted since any area can be guarded if concepts such as ALARA are not taken into consideration. The new wording, "... or that are not continuously guarded ..." provides a clearer statement that explicitly states how this requirement has always been implemented at the Perry Nuclear Power Plant. Thus, this is an administrative change intended to prevent any future misinterpretation.

ENVIRONMENTAL CONSIDERATION

The proposed Technical Specification change request was evaluated against the criteria of 10 CFR 51.22 for environmental consideration. As shown above and in Attachment 3, the proposed changes do not involve a significant hazards consideration, do not increase the types and amounts of effluents that may be released offsite, and do not significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, it has been concluded that the proposed Technical Specification change request meets the criteria given in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.