



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

May 8, 1985
PY-CEI/NRR-0244 L

Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
SER Clarification on
SRV Operability

Dear Mr. Youngblood:

In SER Section 6.3.1.3 (pg. 6-23 attached), it is stated that, "Safety/Relief Valve (SRV) operability will be demonstrated during plant startups by manually actuating each safety/relief valve (including the ADS valves) one at a time and observing the turbine bypass valve for change in position." As stated in our response to your question number 440.4 (in our letter dated October 1, 1981), "The SRVs are fully tested during the startup of the reactor prior to turnover for commercial operation." Our Program for Inservice Testing of Pumps and Valves, which was submitted to you with a letter dated June 15, 1983, states that for ADS valves, manual actuation will be performed at each refueling outage. Therefore, we feel the term "plant startups" in the SER should be clarified in a supplement to the SER to state, "SRV operability (including the ADS valves) will be demonstrated during initial plant startup and after each refueling outage by manually actuating each ADS valve one at a time and observing the turbine bypass valve for change in position."

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

Very truly yours,

Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

cc: Jay Silberg, Esq.
John Stefano (2)
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than the hydrostatic head required to maintain the line full of water up to the injection valves.

The ECCS pumps must have the capability to operate for an extended period of time during the long-term recirculating cooling phase following a LOCA. The acceptability of ECCS pump capability is discussed in Section 3.9.6 of this report.

An electrical interlock was incorporated into the HPCS circuitry that prevents the injection valve from closing automatically upon receipt of the high reactor water level (level 8) signals if a high drywell pressure signal still exists. The interlock was added as a result of the NRC staff review of GESSAR-238, which indicated that the interlock was needed to ensure diversity of HPCS initiation signals and to prevent premature HPCS termination. However, flooding of the steamlines could result in damage to the safety/relief valves and primary system piping unnecessarily, since the interlock tends to keep the HPCS in operation past the point of reflooding the core and does not significantly add to the overall safety. The applicant is participating in the BWR-LRG-II Group for the resolution of this generic issue (designated as generic issue 13-RSB). The LRG-II resolution of this issue was submitted by a letter dated January 25, 1982 from Dale Holtzcher (LRG-II) to H. Faulkner (NRC). The applicant has endorsed the LRG-II position by letter dated April 1, 1982 from Dalwyn R. Davidson (CEI) to James R. Miller (NRC). The LRG-II position is to remove the interlock. This is acceptable to the staff.

Safety/relief valve operability will be demonstrated during plant startups by manually actuating each safety/relief valve (including the ADS valves) one at a time and observing the turbine bypass valve for change in position. The applicant stated that direct valve position indications, via pressure switches in the S/RV discharge lines, will be provided as a response to the TMI lessons learned in NUREG-0578. This is acceptable to the staff.

The Staff asked the applicant to provide assurance that the safety/relief valves have been qualified by environmental testing to support the assumption that seven of the eight ADS valves will operate. This is discussed in Section 3.11 of this report.

TMI Action Item II.K.13 requires that initiation levels of the HPCI and RCIC systems should be separated so that the RCIC system initiates at a higher water level than the HPCI system. Further, the initiation logic of the RCIC system should be modified so that the RCIC system will restart on a low water level. Perry does not use an HPCI system. Both the high-pressure core system (HPCS) and RCIC are initiated at low water level 2.

As a generic item, the possible separation of initiation levels for RCIC and HPCS was studied by General Electric for the BWR Owners Group. The results of that study were forwarded by the BWR Owners Group to the staff by the applicant (letter, December 29, 1980). The applicant has endorsed the conclusion of that study and taken the BWR Licensing Review Group II position (LRG-II generic issue 2-RSB) that the proposed separation of RCIC and HPCS initiation is unnecessary for safety considerations. The LRG-II resolution of this generic issue was submitted to the staff (letter dated November 20, 1981, D. Holtzcher to H. Faulkner) and was endorsed by the applicant (letter November 25, 1981).