



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 - CLEVELAND, OHIO 44101 - TELEPHONE (216) 622-9800 - ILLUMINATING BLDG. - 55 PUBLIC SQUARE

Serving The Best Location in the Nation

MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

August 14, 1985
PY-CEI/NRR-0316 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
FSAR Chapter 12

Dear Mr. Youngblood:

This letter and its attachments are provided to identify the basis for the changes and clarifications made to FSAR Chapter 12 in Amendment 20. Additionally, further clarification is provided on the description in Section 12.5 on the Shop Facility Decontamination Area.

As stated in the FSAR, large or highly contaminated equipment will be decontaminated in a permanent shop facility decontamination area. At this time the location for the permanent decontamination area at the site is under evaluation. We recognize the need for such a permanent facility at Perry, and in the interim, temporary areas with the proper facilities will be designated, to serve our decontamination purposes as the needs arise.

If you have any questions, please call.

Very truly yours,

Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

Attachments

cc: Jay Silberg, Esq.
John Stefano (2)
J. Grobe

8508200066 850814
PDR ADDOCK 05000440
A PDR

8001
11

<u>Page No.</u>	<u>Paragraph No.</u>	<u>Reason for Change</u>
12.1-1	3 and 4	Clarified responsibilities of GSE-Radiation Protection Section and of Plant Health Physicist.
12.1-3	5	The capacity of the floor drain system is designed such that curbs are not needed.
12.1-3	9	To clarify our options in movable shielding.
12.1-6b	1	The ALARA Review Committee consists of individuals from many disciplines and they only review the ALARA Reviews that requires the interface of many disciplines. Significant ALARA reviews would consist of those with greater than 5 man rem actual exposures.
12.1-6b	2	The Annual Operating Report uses generalized categories according to job function. Whereas our review of the annual and planned outage exposure allows not only for a review at a job function level but also for a review at a working group level.
12.1-6b	4	Correction of title to Radiological Control Training.
12.1-6b	5	RWP's are not limited to systems that contain, collect store or transport radioactive materials. A RWP may also be required for contamination and airborne activity. This paragraph was revised to accurately reflect our use of the RWP.
12.1-9 & 12.1-10	all	Health Physics (HP) control is based on <u>actual</u> radiological conditions <u>not</u> to design zones, e.g. certain areas within a design zone may be hotter and require more HP control than was previously shown on pages 12.1-9 and 12.1-10. These pages were revised to reflect the control we have in place, based on <u>actual</u> radiological conditions.

12.1-11	all	This page previously showed only 1 of 3 methods that can be used to monitor dose rates. This page was revised to reflect all 3 methods.
12.2-6	2	The Reactor Startup Sources over a period of time have a tendency to leak and contaminate the reactor coolant. Because of this and the fact that they are no longer required after the initial operating cycle, they are to be removed as stated in this paragraph. The last sentence of this paragraph will be revised to state, "The removal of sources will be handled in accordance with approved procedure's and specified shielding requirements."
12.2-6	12.2.1.3.1 Title	Typo.
12.3-13	1 1st line	The capacity of the floor drain system is designed such that contamination control curbs are not needed.
12.3-13	2	Typo.
12.3.13	5 Item K	To clarify our options in movable shielding.
12.3-18	Item K	A permanent hot machine shop is not presently located in the Perry design.
12.3-54	(c)	Clarification of receiving tank area terminology.
12.3-54	2	Revised because Zone II areas may contain portions of systems which could create contamination problems.
12.3-54	3	Good operational practice. To ensure positive control under varying conditions, and consistency with draft Tech. Specs.
12.3-55	4 and 5	A more representative sample is obtained by placing the samplers directly at the suspected source.
12.3-55	Last	Clarification, since sources may exist in Zone II areas.

12.3-56	Top of page	Based on good operational practice and also a high radiation area is based on actual dose rates not on design.
12.3-56	Item (a)	Based on good operational practice, to allow for locked, guarded or flashing light.
12.3-56	Item (b)	Continuous occupancy areas are based on actual radiological conditions.
12.3-56 and 12.3-57	Items (c) (d), and (e)	Health physics control is based on <u>actual radiological conditions not to design zones</u> . Air samples are taken based on the type of work being performed (clarification). Item (c) will be revised to identify both administrative and physical access controls provided.
12.5-1a	c, h, i, j, l & m	Clarification of plant area terminology and design of plant facilities.
12.5-2	1	Dosimeters will be stored in the dosimetry room.
12.5-2	1	Clarification of plant area terminology and design of plant facilities.
12.5-2	2	Protective clothing may be issued from various storage areas in the plant to allow for easy accessibility.
12.5-2	3	To allow for other storage areas and specific dedicated instruments.
12.5-2	4	To clarify location since there is more than one counting room.
12.5-2	5	To make consistent with Emergency Plan. Stretcher-borne personnel are sent to the hospital as identified in the Emergency Plan.
12.5-2	6	Reflects planned future design of plant facilities.
12.5-4	1	Operational flexibility. CEI plans to have TLD's analyzed monthly or more frequently if required, but at least quarterly in accordance with 10CFR20.

12.5-4	3	To reflect newer technology and 10 CFR 20 requirements.
12.5-4	3	To allow for monitoring of non-radiation workers. FSAR will be revised to reflect that direct reading pocket dosimeters will be issued to plant visitors who must enter the RCA.
12.5-4	4	Clarification of operating data collection. Plant design reduces plant areas in which neutrons would be present.
12.5-5	1	Typo.
12.5-5	3	To accurately reflect Reg. Guide 8.25.
12.5-5	4	To accurately reflect that portable continuous air monitors may be used in various areas. The FSAR will be revised to state that these monitors will normally be located in the areas specified.
12.5-5	5	Design of plant and also reflect the use of procedures <u>and</u> instructions.
12.5-5	6	Protective clothing is stored throughout the plant to make it more readily available for worker use.
12.5-5a	Whole page	The material from this page was placed on the preceding page.
12.5-8	12.5.3.2.2 Title	No change.
12.5-8	1	All Inservice Inspections do not necessarily require a RWP, i.e., some may be in a non-radiologically controlled area or not meet the radiological conditions for a RWP.
12.5-9	3	A RWP is not issued according to systems but is issued according to a combination of factors as stated. The FSAR will be revised to state, "... exposure will require a RWP, as determined by Health Physics, based on currently determined radiation, loose contamination..."

12.5-9	5	According to PNPP's organization, Health Physics can only recommend shielding, engineering must approve.
12.5-10	1	Clarification of periodic sampling.
12.5-10	2	A RWP will specify the protective measures necessary.
12.5-10	4	Did not accurately reflect PNPP's calibrators. Different calibrators may also be used.
12.5-10a	1	To make consistent with PNPP's plant area terminology.
12.5-11	1	A RWP is not issued according to systems but is issued according to a combination of factors as stated. The FSAR will be revised to state, "...exposure will require a RWP, as determined by Health Physics, based on currently determined radiation, loose contamination..."
12.5-11	2	Work can't be controlled by a manual, it can only be controlled by procedures and instructions.
12.5-11	4	To allow use of other instrumentation, e.g., portal monitors.
12.5-11	4	Areas are considered as "contaminated" or "clean," not as "potentially contaminated".
12.5-12a	Sentence under c. Form NRC-3	To allow for oral reports.
12.5-12a	Items a, b, & c	No changes.
Figure 12.5-1	N/A	Design changes.

Additional Clarification with regards to our Whole Body Counting Area:

A Whole Body Counting Area is located at the Training and Education Center of the Perry Nuclear Power Plant. A description of this center was provided to the NRC in the Perry Nuclear Power Plant Emergency Plan (see attached pages).

INFORMATION ONLY

and Radiation Survey Instruments. The use of both elevations is necessary to allow sufficient space for assembling support personnel. The OSC habitability is comparable to that of the Control Room.

The OSC will be staffed as described in Section 5.2.2.2 to provide an area for assembly and dispatch of support personnel during an emergency.

A description of the communications available in the OSC is provided in Section 7.2. The layout of OSC is shown on Figure 7-8.

7.1.3 EMERGENCY OPERATIONS FACILITY (EOF)

The EOF for PNPP is a portion of the ground floor of the Training and Education Center. The Training and Education Center is located about 1/2 mile from the Control Complex along the site access road. It is a 105' x 175', two story, filled concrete block, brick-faced building which provides a protection factor of greater than or equal to 5 for .7 MeV Gamma Radiation for the EOF portion.

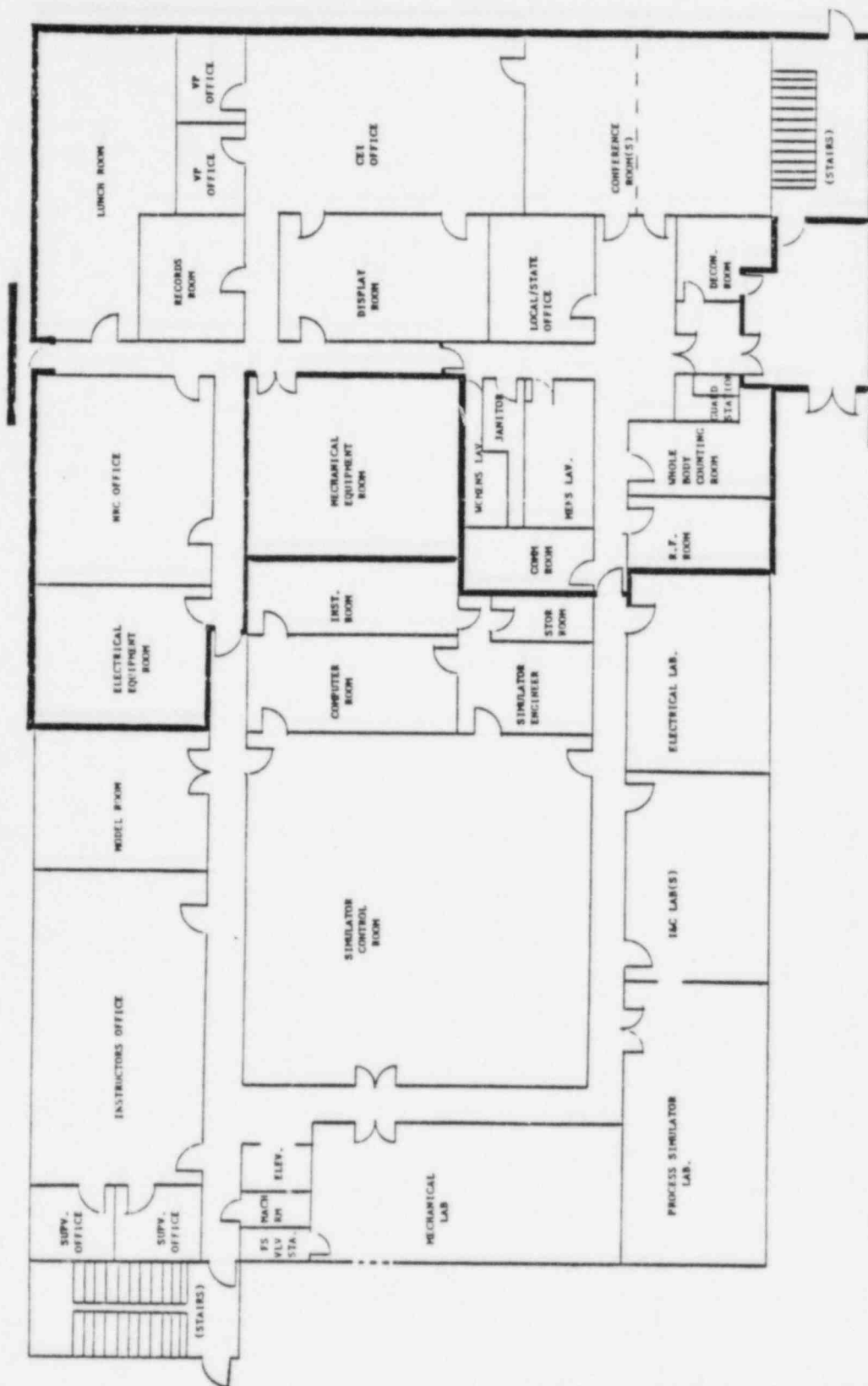
The EOF will be staffed as described in Section 5.2.2.4 to provide overall management of emergency response, coordination of offsite radiological and environmental assessment activities, determination of public protective action recommendations, and coordination of emergency response activities with Federal, State, and Local agencies. The EOF is also the central point for receipt and analysis of field monitoring data and coordination of sample media during an emergency.

The EOF has been sized to provide adequate space to perform all required functions including space for designated Federal, State, and Local officials which may be sent to the EOF. There is a personnel decontamination room in the EOF for decontamination of site evacuees should it be necessary. The General Employee Training room on the second floor of the Training Center can be used for conducting small news media briefings. The layout of the EOF is shown in Figure 7-3.

The EOF has an isolable, high-efficiency particulate air filtered ventilation system which functions in a manner comparable to the Control Room ventilation system. Included in the ventilation system is a particulate, iodine, and noble gas radiation monitor which will distinguish radioiodines at concentrations as low as 10^{-7} microcuries/cc. This monitor provides continuous indication and has an alarm which activates when levels increase to a predetermined value. An area radiation monitor will also be installed to indicate the radiation dose rate inside the EOF and provide an alarm when levels increase above a predetermined value.

A description of the communications available in the EOF is provided in Section 7.2.

The technical data and instrumentation available in the EOF include computer terminals from the Emergency Response Information System and the Radiation Protection Data Information System which are described in Sections 7.3.1 and 7.3.2 respectively.



INFORMATION ONLY

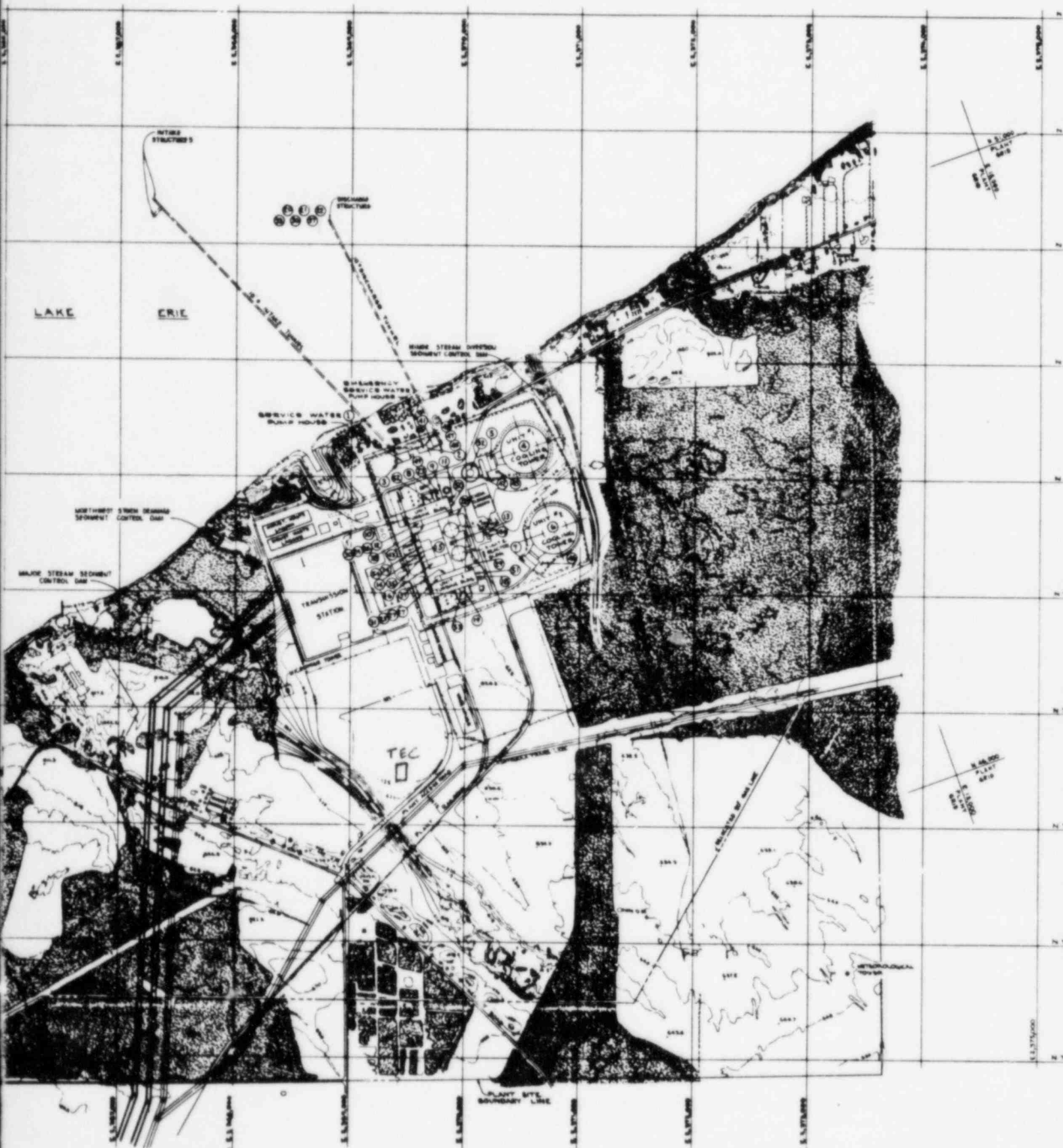


PERRY NUCLEAR POWER PLANT
THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY

Training and Education Center/
 Emergency Operations Facility
 (First Floor Layout)

Figure 7-3

INFORMATION ONLY



SITE LAYOUT SHOWING TEC