



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 15, 2020

MEMORANDUM TO: Lauren K. Gibson, Acting Chief
License Renewal Projects Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

FROM: Eric R. Oesterle, Senior Project Manager */RA/*
License Renewal Projects Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MAY 21, 2020 TELECONFERENCE WITH ENERGY
HARBOR NUCLEAR CORPORATION TO DISCUSS PLANS AND
OPTIONS FOR LICENSE RENEWAL OF THE PERRY NUCLEAR
POWER PLANT, UNIT 1

On May 21, 2020, the U.S. Nuclear Regulatory Commission (NRC) held a Category 1 public meeting with Energy Harbor Nuclear Corporation (Energy Harbor) to discuss plans and options for license renewal of the Perry Nuclear Power Plant, Unit 1. On November 27, 2018, FirstEnergy Nuclear Operating Company (now Energy Harbor) notified the NRC that they no longer planned to submit a license renewal application for Perry, Unit 1 based on their planned shutdown of Perry (ADAMS Accession No. ML18331A155). Following their re-organization as Energy Harbor, those plans have changed.

The purpose of this public meeting was for representatives from Energy Harbor to provide an update on their comprehensive plans regarding license renewal for Perry, Unit 1. In addition, in response to a request from Energy Harbor, the NRC staff shared their thoughts on risks and challenges regarding an approach proposed by Energy Harbor that contemplated concurrent applications for initial and subsequent license renewal. There were no questions or comments from members of the public.

A summary of the discussion is provided below.

CONTACT: Eric R. Oesterle, NRR/DNRL
301-415-1014

SUBJECT: SUMMARY OF MAY 21, 2020 TELECONFERENCE WITH ENERGY HARBOR NUCLEAR CORPORATION TO DISCUSS PLANS AND OPTIONS FOR LICENSE RENEWAL OF THE PERRY NUCLEAR POWER PLANT, UNIT 1 DATED JUNE 15, 2020

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ADAMS Accession No.: ML20163A627

***via email**

NRR-106

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DATE	06/15/2020	06/15/2020	

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MEETING SUMMARY

Background

The Perry Nuclear Power Plant, Unit 1, is a 3758 Mwt, boiling water reactor located in Perry, OH, approximately 35 miles northeast of Cleveland. Perry, Unit 1 received its operating license (OL) on November 13, 1986 and its OL expiration date is March 18, 2026. On May 25, 2017, FirstEnergy Nuclear Operating Company (FENOC), notified the NRC of its plans to submit a license renewal application for Perry, Unit 1 in the fourth quarter of 2020 (ADAMS Accession No. ML17145A171). On November 27, 2018, FENOC indicated that, with the planned shutdown of Perry, they no longer planned to submit a license renewal application (ADAMS Accession No. ML18331A155). In a subsequent letter to the NRC dated July 26, 2019 (ADAMS Accession No. ML19207A097), the licensee withdrew the "Certification of Permanent Cessation of Power Operations" for Perry, Unit 1.

Summary of Discussions

During the public meeting on May 21, 2020, representatives from Energy Harbor informed the NRC staff of their comprehensive plan for renewal of the Perry, Unit 1 operating license. Mr. Tom Lentz, Licensing Director, indicated that Energy Harbor had submitted three documents associated with license renewal for Perry, Unit 1:

- 1) Notice of Intent to Submit License Renewal Application, dated May 13, 2020 (ADAMS Accession No. ML20134H987), indicating the licensee's intent to submit the Perry, Unit 1 license renewal application in the third quarter of 2023.
- 2) Timely License Renewal Protection Exemption Request, dated May 15, 2020 (ADAMS Accession No. ML20136A353), which if approved would allow Energy Harbor to submit their license renewal application 3 years prior to the OL expiration date as opposed to the 5-years prior contemplated in the regulations.
- 3) License Amendment Request to Extend License Expiration Date By Recapturing Low-Power Testing Time, dated March 26, 2020 (ADAMS Accession No. ML20086K773), which would extend the OL expiration date from March 18, 2026 to November 7, 2026.

Mr. Lentz further indicated that during a telephone call in December 2019 to Mr. Eric Oesterle, then Chief of the License Renewal Projects Branch, he stated that Energy Harbor would be reassembling its license renewal project team. During this call Mr. Lentz asked about the possibility of concurrently submitting the initial and subsequent license renewal applications.

Mr. Oesterle responded that since that telephone call, the NRC staff had looked into the question and would be able to provide some insights into potential challenges and risks for several options associated with submittal of a subsequent license renewal application (SLRA) concurrent with a license renewal application (LRA). Mr. Oesterle presented the NRC staff's thoughts on the following three options:

- Option 1: Sequential submittal of Perry SLRA immediately following NRC approval of initial LRA
- Option 2: Concurrent submittal of Perry SLRA with LRA
- Option 3: Submittal of Perry LRA with an exemption request to allow for up to 40 years for the initial LRA

Discussions of the options above generally focused on the following:

- Option 1 is consistent with the normal process. The other options would likely require engagement with the Commission via policy paper, which could delay the start of any staff review pending Commission direction.
- Options 2 and 3 involve a first of a kind processes and thus include greater uncertainty regarding the technical, policy, and adjudicatory aspects of the review.
- Potential exemptions that could be required to implement Option 2 or 3.
- Potential complications that could arise from any of these Options.

Energy Harbor representatives indicated that the risks and challenges communicated for Options 1 and 2 were generally consistent with their own internal analyses, however, they had not considered Option 3. Mr. Lentz thanked the NRC staff for providing their insights into the various options and indicated that should Energy Harbor wish to discuss Option 3 further they would request another meeting.

There were no comments or questions about the discussions from the public.

The list of participants for the meeting is provided as an attachment.

MEETING PARTICIPANTS	
Name	Affiliation
Bob Caldwell	NRR/DNRL
Lauren Gibson	NRR/DNRL/NLRP
Eric Oesterle	NRR/DNRL/NLRP
Allen Hiser	NRR/DNRL
Bryce Lehman	NRR/DEX/ESEB
On Yee	NRR/DNRL/NVIB
David Rudland	NRR/DNRL
Scott Wall	NRR/DORL/LPL3
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Kevin Folk	NMSS/REFS/ERLRB
Tison Campbell	OGC
David Roth	OGC
Anita Ghosh Naber	OGC
Christina England	OGC
Nicolas Mertz	OGC
Janelle Jessie	COMM/OCMJB
Matthew Domke	R-III/DRS/EB1
Tom Lentz	Energy Harbor
Ted Hilston	Energy Harbor