



Perry Nuclear Power Plant
10 Center Road
P.O. Box 97
Perry, Ohio 44081

Rod L. Penfield
Site Vice President, Perry Nuclear

440-280-5382

October 28, 2021
L-21-018

10 CFR 50.71(e)
10 CFR 50.54(a)

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

SUBJECT:
Perry Nuclear Power Plant
Docket No. 50-440, License No. NPF-58
Submittal of the Updated Safety Analysis Report, Revision 22

In accordance with the requirements of 10 CFR 50.71(e), Energy Harbor Nuclear Corporation (EHNC) is hereby submitting to the Nuclear Regulatory Commission (NRC) the Perry Nuclear Power Plant (PNPP) Updated Safety Analysis Report (USAR), Revision 22, in CD-ROM format. This submittal reflects facility and procedure changes implemented between April 4, 2019 (the end of Refueling Outage 17), and April 8, 2021 (the end of Refueling Outage 18), along with several changes implemented after Refueling Outage 18.

In accordance with 10 CFR 50.4(b)(6), Revision 22 of the PNPP USAR is submitted electronically on a total replacement basis. As required by NRC guidance for electronic submissions, Attachments 1 and 2 provide a listing of the document components that make up the two enclosed CD-ROMs. In addition to the USAR, the first enclosed CD-ROM includes the Technical Specification (TS) Bases, Revision 13, submitted to satisfy TS 5.5.11, "Technical Specifications (TSs) Bases Control Program," which requires submittal of TS Bases changes implemented without prior NRC approval.

The second enclosed CD-ROM includes the PNPP USAR, and TS Bases with information identified in accordance with NRC Regulatory Issue Summary (RIS) 2015-17, "Review and Submission of Updates to Safety Analysis Reports, Emergency Preparedness Documents, and Fire Protection Documents," removed.

Attachment 3 includes a summary of information removed from the USAR in accordance with Appendix A to Nuclear Energy Institute (NEI) 98-03, "Guidelines for Updating Safety Analysis Reports," Revision 1.

A053
NRR

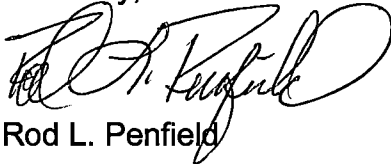
Perry Nuclear Power Plant
L-21-018
Page 2

Attachment 4 includes a summary of regulatory commitment changes to be submitted in accordance with NEI 99 04, "Guidelines for Managing NRC Commitment Changes," Revision 0, as endorsed by NRC RIS 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff."

This certifies, to the best of my judgment and belief, that Revision 22 of the PNPP USAR accurately presents changes made since the previous submittal that are necessary to reflect information and analysis submitted to the Commission or pursuant to Commission requirements.

This submittal contains no new regulatory commitments. If you have any questions regarding this report, please contact Mr. Phil H. Lashley, Manager – Fleet Licensing, at (330) 696-7208.

Sincerely,



Rod L. Penfield

Attachments:

1. List of Document Components on CD-ROM 1
2. List of Document Components on CD-ROM 2 (Information Identified Per RIS 2015-17 Removed)
3. Information Removed from the PNPP USAR
4. Commitment Change Summary Report

Enclosures:

- A. Perry Nuclear Power Plant USAR, and Technical Specification Bases (on CD-ROM 1)
- B. Perry Nuclear Power Plant USAR With Information Identified Per RIS 2015-17 Removed, and Technical Specification Bases (on CD-ROM 2)

cc: NRC Region III Administrator (without Enclosure B)
NRC Resident Inspector (without Enclosure B)
NRC Project Manager (without Enclosure B)

Attachment 1
L-21-018

List of Document Components on CD-ROM 1
Page 1 of 2

<u>File Name</u>	<u>Size</u>
001 LIST EFF Rev 22.pdf	146 KB
002 Chapter 00.pdf	856 KB
003 Chapter 01.pdf	14,156 KB
004 Chapter 02.0 to 02.4.pdf	14,129 KB
005 Chapter 02.5 to 02E.pdf	38,219 KB
006 Chapter 03.pdf	15,665 KB
007 Chapter 04.pdf	13,526 KB
008 Chapter 05.pdf	13,848 KB
009 Chapter 06.pdf	14,278 KB
010 Chapter 07.pdf	13,909 KB
011 Chapter 08.pdf	13,660 KB
012 Chapter 09.pdf	15,450 KB
013 Chapter 10.pdf	13,523 KB
014 Chapter 11.pdf	13,800 KB
015 Chapter 12.pdf	13,771 KB
016 Chapter 13.pdf	13,386 KB
017 Chapter 14.pdf	13,763 KB
018 Chapter 15.pdf	14,723 KB
019 Chapter 16.pdf	57 KB
020 Chapter 17.pdf	72 KB
021 FIG_LIST Rev 22.pdf	211 KB
022 Figures Section 01.pdf	17,285 KB
023 Figures Section 02 (2.1-1 to 2.5-46).pdf	28,300 KB
024 Figures Section 02 (2.5-47 to 2.5-49).pdf	20,215 KB
025 Figures Section 02 (2.5-50 to 2.5-215).pdf	26,172 KB
026 Figures Section 02D-1 to 02D-2.pdf	19,648 KB
027 Figures Section 02D-3 to 02E-1.pdf	32,280 KB

<u>File Name</u>	<u>Size</u>
028 Figures Section 03.pdf	39,005 KB
029 Figures Section 04.pdf	1,560 KB
030 Figures Section 05.pdf	4,989 KB
031 Figures Section 06.pdf	7,730 KB
032 Figures Section 07.pdf	10,280 KB
033 Figures Section 08.pdf	3,142 KB
034 Figures Section 09 (9.1-1 to 9.4-29).pdf	19,597 KB
035 Figures Section 09 (9.5-1 to 9.5-26).pdf	4,324 KB
036 Figures Section 09 (9A-1 to 9A-34).pdf	9,790 KB
037 Figures Section 10.pdf	16,875 KB
038 Figures Section 11.pdf	2,660 KB
039 Figures Section 12.pdf	18,237 KB
040 Figures Section 13.pdf	145 KB
041 Figures Section 14.pdf	241 KB
042 Figures Section 15.pdf	5,587 KB
043 PNPP TS Bases Rev 13.pdf	955 KB

Attachment 2
L-21-018

List of Document Components on CD-ROM 2
(Information Identified Per RIS 2015-17 Removed)
Page 1 of 2

<u>File Name</u>	<u>Size</u>
001 LIST_EFF Rev 22.pdf	121 KB
002 Chapter 00.pdf	1,008 KB
003 Chapter 01.pdf	14,156 KB
004 Chapter 02.0 to 02.4.pdf	14,129 KB
005 Chapter 02.5 to 02E.pdf	38,219 KB
006 Chapter 03.pdf	15,665 KB
007 Chapter 04.pdf	13,526 KB
008 Chapter 05.pdf	13,848 KB
009 Chapter 06.pdf	14,278 KB
010 Chapter 07.pdf	13,909 KB
011 Chapter 08.pdf	13,660 KB
012 Chapter 09.pdf	15,450 KB
013 Chapter 10.pdf	13,523 KB
014 Chapter 11.pdf	13,800 KB
015 Chapter 12.pdf	13,771 KB
016 Chapter 13.pdf	13,386 KB
017 Chapter 14.pdf	13,763 KB
018 Chapter 15.pdf	14,723 KB
019 Chapter 16.pdf	57 KB
020 Chapter 17.pdf	72 KB
021 FIG_LIST Rev 22.pdf	211 KB
022 Figures Section 01.pdf	5,433 KB
023 Figures Section 02 (2.1-1 to 2.5-46).pdf	28,300 KB
024 Figures Section 02 (2.5-47 to 2.5-49).pdf	20,215 KB
025 Figures Section 02 (2.5-50 to 2.5-215).pdf	26,171 KB
026 Figures Section 02D-1 to 02D-2.pdf	19,648 KB
027 Figures Section 02D-3 to 02E-1.pdf	32,280 KB

<u>File Name</u>	<u>Size</u>
028 Figures Section 03.pdf	27,846 KB
029 Figures Section 04.pdf	1,560 KB
030 Figures Section 05.pdf	4,989 KB
031 Figures Section 06.pdf	7,540 KB
032 Figures Section 07.pdf	10,280 KB
033 Figures Section 08.pdf	2,746 KB
034 Figures Section 09 (9.1-1 to 9.4-29).pdf	18,370 KB
035 Figures Section 09 (9.5-1 to 9.5-26).pdf	4,324 KB
036 Figures Section 09 (9A-1 to 9A-34).pdf	616 KB
037 Figures Section 10.pdf	16,875 KB
038 Figures Section 11.pdf	2,660 KB
039 Figures Section 12.pdf	1,968 KB
040 Figures Section 13.pdf	145 KB
041 Figures Section 14.pdf	241 KB
042 Figures Section 15.pdf	5,587 KB
043 PNPP TS Bases Rev 13.pdf	955 KB

Attachment 3
L-21-018

Information Removed from the PNPP USAR
Page 1 of 1

In accordance with Nuclear Energy Institute (NEI) 98-03, Revision 1, "Guidelines for Updating Safety Analysis Reports," licensees periodically report a brief description of information removed from the Updated Safety Analysis Report (USAR) and the basis for its removal. The following provides a summary of the information removed from the PNPP USAR and the basis for removal.

1. The acronym "FENOC" was removed throughout the USAR for occasions that referred to the FENOC Quality Assurance Program Manual (QAPM) or other programs such as the corrective action program. These programs are company programs required by regulations. Rewording from "FENOC" to "company" is simply rewording text without changing the scope, meaning, or level of detail. Letters, programs, and manuals that previously included FENOC are now referred to as "company." Where appropriate, when referring to the specific name, "FENOC" was replaced with "Energy Harbor Nuclear Corp." and "FirstEnergy" was replaced with "Energy Harbor Corp." Section 4.5.1.4.1 contained information relative to General Electric engineering representation that is beyond the level of necessary detail and is not important to providing and understanding the plant's design and operation from either a general or system functional perspective.
2. Removed obsolete information from Section 13.1.1.2, Table 13.1-1, and Figure 13.1-2 related to the Perry Engineering Organization. The Manager, Technical Services Engineering, and Manager, Plant Engineering, are obsolete position titles that no longer reflect the current organization. These positions have been consolidated into one position, Manager, Strategic Engineering. The responsibilities assigned to the engineering organization have not changed but have been rearranged to reflect the current organizational structure. Section 13.1.1.2 contained descriptive information that is not important to providing and understanding the plant's design and operation from either a general or system functional perspective.

Attachment 4
L-21-018

Commitment Change Summary Report
Page 1 of 1

COMMITMENT NUMBER / SOURCE / DATE	COMMITMENT DESCRIPTION	CHANGE	REASON FOR CHANGE
PY-L02090 PY-CEI/NRR-1861L, 9/20/1994 NRC BL 90-01, Supplement 1, 12/22/1992	A current special pressure transient check, which would identify transmitter failure due to loss of sensor fill-oil, will remain in calibration procedures after the enhanced 24 month monitoring program is completed.	Closed.	The subject transmitters associated with this commitment have been replaced with those that are not susceptible to the failure mechanism (loss of fill-oil) identified in NRC BL 90-01, Supplement 1. As replacement of the transmitters with a non- susceptible transmitter was the alternative to maintaining an enhanced surveillance program per BL 90-01, Supplement 1, the commitment is no longer applicable.

List of Abbreviations Used:

BL	Bulletin
NRC	Nuclear Regulatory Commission