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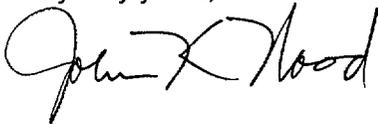
Perry Nuclear Power Plant
Docket No. 50-440
Response to Request for Additional Information Regarding
Containment Spray License Amendment Request

Ladies and Gentlemen:

A license amendment request to revise the surveillance frequency for containment spray nozzle inspections was submitted in a letter dated November 1, 1999 (PY-CEI/NRR-2442L). In a subsequent telephone conference, questions from the Nuclear Regulatory Commission (NRC) technical reviewer were resolved. Documentation of the response to those questions is contained in Attachment 1.

If you have questions or require additional information, please contact Mr. Gregory A. Dunn, Manager - Regulatory Affairs, at (440) 280-5305.

Very truly yours,



Attachment

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

ADD1

Response to Questions on Containment Spray Nozzle Surveillance Frequency

A telephone conference was held with the Nuclear Regulatory Commission (NRC) staff on February 29, 2000. The purpose of the conference was to resolve questions/issues raised by the NRC technical reviewer regarding a proposed amendment that would revise the Containment Spray Surveillance Requirement (SR) frequency for SR 3.6.1.7.4, from "once per 10 years", to "following maintenance which could result in nozzle blockage". The reviewer asked what type of maintenance work would be expected to trigger this surveillance.

The response was that normal plant operation and maintenance practices at the Perry facility are not expected to trigger this surveillance requirement. Only an unanticipated circumstance would initiate this surveillance, such as an inadvertent spray actuation, or a loss of foreign material control when working within the affected boundary. Per the established corrective action program, either of these events would trigger a high level investigation (e.g., Condition Report). The Condition Report would include remedial actions to ensure the spray nozzles are operable prior to being returned to service, and actions to prevent recurrence would address long term operability.

Current procedures require a pre-job and post-job Foreign Material Exclusion (FME) evaluation of maintenance activities that breach systems. In addition, the Post Maintenance Test Instructions for these sections of the piping systems will specifically address the need for an engineering evaluation to determine whether a Containment Spray Nozzle Test is necessary to ensure the nozzles remain unobstructed.

When a test is determined necessary, a visual inspection (e.g., boroscope) of the nozzles could be utilized in lieu of either a smoke or air test. Such inspections would be proceduralized.

Commitments

The Post Maintenance Test Instructions for these sections of the piping systems will specifically address the need for an engineering evaluation, to determine whether a Containment Spray Nozzle Test is necessary to ensure the nozzles remain unobstructed.
