

October 11, 2000

Mr. John K. Wood
Vice President - Nuclear, Perry
FirstEnergy Nuclear Operating Company
P.O. Box 97, A200
Perry, OH 44081

SUBJECT: PERRY NUCLEAR POWER PLANT, UNIT 1 - ISSUANCE OF CORRECTED
TECHNICAL SPECIFICATION PAGES (TAC NO. MA8939)

Dear Mr. Wood:

The staff has provided guidance, outside the normal 10 CFR 50.90 process, for correcting typographical errors that have been inadvertently introduced in the technical specifications. This guidance, which has limited applications, is found in an internal Nuclear Regulatory Commission memorandum, subsequently made publicly available, from Roy Zimmerman to Steven Varga, Jack Roe, and Christopher Grimes, dated January 16, 1997.

Consistent with this guidance, your letter of May 11, 2000 (PY-CEI/NRR-2496L), identified a number of typographical errors in the technical specifications for the Perry Nuclear Power Plant, Unit 1. The staff has reviewed this information and concurs that the typographical errors were inadvertently introduced, were not addressed in the notice to the public, nor reviewed by the staff. Therefore, the staff finds the proposed changes acceptable.

A copy of the staff's evaluation along with revised technical specification pages are enclosed.

Sincerely,
/RA/
Douglas V. Pickett, Sr. Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-440

- Enclosures: 1. Staff Evaluation
2. Revised Technical Specification pages

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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J. Wood
FirstEnergy Nuclear Operating Company

Perry Nuclear Power Plant, Units 1 and 2

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ATTACHMENT

FACILITY OPERATING LICENSE NO. NPF-58

DOCKET NO. 50-440

Replace the following pages of the Appendix "A" Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

<u>Remove</u>	<u>Insert</u>
3.3-53a	3.3-53a
3.4-10	3.4-10
3.6-16	3.6-16
3.7-15	3.7-15
3.7-16	3.7-16
3.8-6	3.8-6
3.8-28	3.8-28
5.0-1	5.0-1

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.3.6.1.7 -----NOTE----- For Function 1.e in Table 3.3.6.1-1, this SR is applicable only to the Division 1 and 2 instruments. ----- Perform CHANNEL FUNCTIONAL TEST.</p>	<p>184 days</p>

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.4 Safety/Relief Valves (S/RVs)

LCO 3.4.4 The safety function of seven S/RVs shall be OPERABLE,
AND
The relief function of six additional S/RVs shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required S/RVs inoperable.	A.1 Be in MODE 3.	12 hours
	<u>AND</u> A.2 Be in MODE 4.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY								
SR 3.4.4.1 Verify the safety function lift setpoints of the required S/RVs are as follows: <table style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th><u>Number of S/RVs</u></th> <th><u>Setpoint (psig)</u></th> </tr> </thead> <tbody> <tr> <td>8</td> <td>1165 ± 34.9</td> </tr> <tr> <td>6</td> <td>1180 ± 35.4</td> </tr> <tr> <td>5</td> <td>1190 ± 35.7</td> </tr> </tbody> </table>	<u>Number of S/RVs</u>	<u>Setpoint (psig)</u>	8	1165 ± 34.9	6	1180 ± 35.4	5	1190 ± 35.7	In accordance with the Inservice Testing Program
<u>Number of S/RVs</u>	<u>Setpoint (psig)</u>								
8	1165 ± 34.9								
6	1180 ± 35.4								
5	1190 ± 35.7								

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.1.3.3 -----NOTES-----</p> <ol style="list-style-type: none"> 1. Only required to be met in MODES 1, 2, and 3. 2. Valves and blind flanges in high radiation areas may be verified by use of administrative means. 3. Not required to be met for PCIVs that are open under administrative controls. <p>-----</p> <p>Verify each primary containment isolation manual valve and blind flange that is located outside primary containment, drywell, and steam tunnel and is required to be closed during accident conditions is closed.</p>	<p>31 days</p>

(continued)

3.7 PLANT SYSTEMS

3.7.8 Fuel Handling Building

LCO 3.7.8 The fuel handling building (FHB) shall be OPERABLE.

APPLICABILITY: During movement of recently irradiated fuel assemblies in the FHB.

ACTIONS

-----NOTE-----
LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. FHB inoperable.	A.1 Suspend movement of recently irradiated fuel assemblies in the FHB.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.8.1 Verify all FHB floor hatches and the shield blocks adjacent to the shield building are installed, and the FHB railroad track door is closed.	24 hours
SR 3.7.8.2 Verify each FHB access door is closed, except when the access opening is being used for entry and exit.	24 hours

3.7 PLANT SYSTEMS

3.7.9 Fuel Handling Building Ventilation Exhaust System

LCO 3.7.9 Three fuel handling building (FHB) ventilation exhaust subsystems shall be OPERABLE.

APPLICABILITY: During movement of recently irradiated fuel assemblies in the FHB.

ACTIONS

-----NOTE-----
LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required FHB ventilation exhaust subsystem inoperable.	A.1 Restore FHB ventilation exhaust subsystem to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Place two OPERABLE FHB ventilation exhaust subsystems in operation.	Immediately
	<u>OR</u> B.2 Suspend movement of recently irradiated fuel assemblies in the FHB.	Immediately
C. Two or three FHB ventilation exhaust subsystems inoperable.	C.1 Suspend movement of recently irradiated fuel assemblies in the FHB.	Immediately

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.3 -----NOTES-----</p> <ol style="list-style-type: none"> 1. DG loadings may include gradual loading as recommended by the manufacturer. 2. Momentary transients outside the load range do not invalidate this test. 3. This Surveillance shall be conducted on only one DG at a time. 4. This SR shall be preceded by, and immediately follow, without shutdown, a successful performance of SR 3.8.1.2 or SR 3.8.1.7. <p>-----</p> <p>Verify each DG operates for ≥ 60 minutes at a load ≥ 5600 kW and ≤ 7000 kW for Division 1 and 2 DGs, and ≥ 2600 kW for Division 3 DG.</p>	<p>31 days</p>
<p>SR 3.8.1.4 Verify each day tank contains ≥ 316 gal of fuel oil for Divisions 1 and 2 and ≥ 279 gal for Division 3.</p>	<p>31 days</p>
<p>SR 3.8.1.5 Check for and remove accumulated water from each day tank.</p>	<p>31 days</p>
<p>SR 3.8.1.6 Verify the fuel oil transfer system operates to automatically transfer fuel oil from the storage tank to the day tank.</p>	<p>31 days</p>

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.5 DC Sources—Shutdown

LCO 3.8.5 The following DC electrical power subsystems shall be OPERABLE:

- a. One Class 1E DC electrical power subsystem capable of supplying one division of the Division 1 or 2 onsite Class 1E electrical power distribution subsystem(s) required by LCO 3.8.8, "Distribution Systems - Shutdown";
- b. One Class 1E battery or battery charger, other than the DC electrical power subsystem in LCO 3.8.5.a, capable of supplying the remaining Division 1 or Division 2 onsite Class 1E DC electrical power distribution subsystem when required by LCO 3.8.8; and
- c. The Division 3 DC electrical power subsystem capable of supplying the Division 3 onsite Class 1E DC electrical power distribution subsystem, when the Division 3 onsite Class 1E DC electrical power distribution subsystem is required by LCO 3.8.8.

APPLICABILITY: MODES 4 and 5.
During movement of recently irradiated fuel assemblies in the primary containment or fuel handling building.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The plant manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

The plant manager, or his designee, shall approve, prior to implementation, each proposed test, experiment, or modification to systems or equipment that affect nuclear safety, and all administrative procedures.

5.1.2 The shift supervisor (SS) shall be responsible for the control room command function. During any absence of the SS from the control room while the unit is in MODE 1, 2, or 3, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the SS from the control room while the unit is in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO FACILITY OPERATING LICENSE NO. NPF-58

FIRSTENERGY NUCLEAR OPERATING COMPANY

PERRY NUCLEAR POWER PLANT, UNIT 1

DOCKET NO. 50-440

1.0 INTRODUCTION

The staff has provided guidance, outside the normal 10 CFR 50.90 process, for correcting typographical errors that have been inadvertently introduced in the technical specifications (TSs). This guidance, which has limited application, is found in an internal Nuclear Regulatory Commission (NRC) memorandum, subsequently made publicly available, from Roy Zimmerman to Steven Varga, Jack Roe, and Christopher Grimes, dated January 16, 1997.

In general, correction of a typographical error discovered in the TSs must be treated the same as any request to amend the license. Thus, typographical errors, discovered in the TSs for which the origin of the error is unknown must be corrected through the normal processing of a license amendment request. An exception to this general rule is the case in which the staff or licensee can demonstrate that the error was introduced inadvertently in a particular license amendment, and that the erroneous change was not addressed in the notice to the public nor reviewed by the staff. Under these limited circumstances, the change that introduced the typographical error was not a proper amendment to the license because it was neither addressed in the notice nor reviewed, and correction of the typographical error is not a "change" to the TSs. Accordingly, the typographical error may be corrected by a letter to the licensee from the NRC staff, instead of an amendment to the license. The limitation on tracing the introduction of a typographical error to a specific license amendment application is necessary to establish that the change introduced by the error was in fact improperly made.

2.0 EVALUATION

In accordance with the staff's guidance, the licensee's letter of May 11, 2000, identified a number of typographical errors in the TSs for the Perry Nuclear Power Plant, Unit 1. The staff has reviewed this information and concurs that the typographical errors were inadvertently introduced, were not addressed in the notice to the public, nor reviewed by the staff. Therefore, the changes should not have been included as part of the license amendments and the staff finds their correction to be appropriate and acceptable.

The individual technical specification changes are identified as follows:

TS Page 3.3-53a

Amendment No. 79, issued on January 29, 1996, introduced page 3.3-53a when revising the TSs to reflect a conversion from analog temperature instrumentation associated with leak detection to digital equipment.

Changes made to page 3.3-53 caused surveillance requirements to roll-over to the new page 3.3-53a. When surveillance requirements roll-over to a subsequent page, the format of the improved Technical Specifications (iTS) calls for a header that reads, "Surveillance Requirements (continued)." Page 3.3-53a of Amendment No. 79 was issued without this header. The staff concludes that deletion of this header was inadvertently introduced, not addressed in the notice to the public, and not reviewed by the staff.

TS Page 3.4-10

Amendment No. 101, issued on March 3, 1999, revised page 3.4-10 of TS 3.4.4, "Safety/Relief Valves (SRVs)," by increasing the existing $\pm 1\%$ tolerance on the safety mode lift setpoint for the safety relief valves to $\pm 3\%$.

Page 3.4-10 previously included a footer with the word "continued" which indicated that surveillance requirements rolled-over to page 3.4-11. Staff review has determined that the footer on page 3.4-10 was included in the licensee's submittal of July 13, 1998, but inadvertently deleted when reissued as Amendment No. 101. The staff concludes that deletion of this footer was inadvertently introduced, not addressed in the notice to the public, and not reviewed by the staff.

TS Page 3.6-16

Amendment No. 100, issued on February 24, 1999, revised page 3.6-16 of TS Surveillance Requirement 3.6.1.3.4 to permit removal of the inclined fuel transfer system primary containment blind flange while primary containment integrity is required.

Page 3.6-16 previously included a header that read "Surveillance Requirements (continued)" indicating that surveillance requirements on this page rolled-over from the previous page. Staff review has determined that the header on page 3.6-16 was included in the licensee's submittal of August 31, 1998, but inadvertently deleted when reissued as Amendment No. 100. The staff concludes that deletion of this header was inadvertently introduced, not addressed in the notice to the public, and not reviewed by the staff.

TS Page 3.7-15

Amendment No. 69, issued on June 23, 1995, revised the entire TSs to reflect conversion to the iTS.

The format of the iTS calls for a solid, double horizontal line both above and below the ACTION statements of each Limiting Condition for Operation (LCO). When issuing page 3.7-15 in Amendment No. 69, a single horizontal line substituted for the double horizontal line located just above the ACTION statements. The staff concludes that substitution of a single horizontal line was inadvertently introduced, not addressed in the notice to the public, and not reviewed by the staff.

TS Page 3.7-16

Similar to the item above, Amendment No. 69 also substituted a single horizontal line for a double horizontal line located just above the ACTION statements on page 3.7-16. The staff concludes that substitution of a single horizontal line was inadvertently introduced, not addressed in the notice to the public, and not reviewed by the staff.

TS Page 3.8-6

Amendment No. 92, issued on March 12, 1998, revised page 3.8-6 of TS 3.8.1, "A.C. Sources - Operating," consistent with the recommendations of NRC Generic Letter 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators."

Page 3.8-6 previously included a header that read "Surveillance Requirements (continued)" indicating that surveillance requirements on this page rolled-over from the previous page. Staff review has determined that the header on page 3.8-6 was included in the licensee's submittal of December 23, 1997, but inadvertently deleted when reissued as Amendment No. 92. The staff concludes that deletion of this header was inadvertently introduced, not addressed in the notice to the public, and not reviewed by the staff.

TS Page 3.8-11

Amendment No. 99, issued on February 24, 1999, revised page 3.8-11 of TS 3.8.1, "AC Sources - Operating," to increase diesel generator allowable outage times.

While the licensee concluded that the staff's formatting on page 3.8-11 was inconsistent with the standard formatting of the ITS, the staff corrected this error in Amendment No. 115, issued on August 29, 2000.

TS Page 3.8-21

Amendment No. 69, issued on June 23, 1995, revised the entire TSs to reflect conversion to the ITS.

When surveillance requirements roll-over to a subsequent page, the format of the ITS calls for a footer with the word "continued" to indicate that surveillance requirements continue to the next page. When page 3.8-21 was issued in Amendment No. 69, the footer with the word "continued" was deleted. The staff corrected this error in a correction letter to Amendment Nos. 111 and 112 dated July 20, 2000.

TS Page 3.8-28

Amendment No. 102, issued on March 11, 1999, revised page 3.8-28 of TS 3.8.5, "DC Sources - Operating," to modify the Applicability statement of the LCO.

The format of the ITS calls for indenting the second and each succeeding line of text that further defines the Applicability of the LCO. Staff review concludes that the second line of text on page 3.8-28 was indented in the licensee's submittal of November 2, 1995, but was not indented when reissued as Amendment No. 102. The staff concludes that deleting this

indentation was inadvertently introduced, not addressed in the notice to the public, and not reviewed by the staff.

TS Page 5.0-1

Amendment No. 69, issued on June 23, 1995, revised the entire TSs to reflect conversion to the ITS.

When issuing page 5.0-1, a single horizontal line was introduced across the bottom of the page. This line serves no apparent purpose and is inconsistent with the format of the ITS. The staff concludes that this horizontal line was inadvertently introduced, not addressed in the notice to the public, and not reviewed by the staff.

Principal Contributor: Douglas Pickett, NRR

Date: October 11, 2000