



FirstEnergy Nuclear Operating Company

Perry Nuclear Power Plant
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September 10, 2001
PY-CEI/NRR-2592L

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Perry Nuclear Power Plant
Docket No. 50-440
Submittal of Revision 11 to the Updated Safety Analysis Report
And Summary of Changes Made to the Quality Assurance Program

Ladies and Gentlemen:

Pursuant to 10 CFR 50.71(e), enclosed please find one (1) original and ten (10) copies of Revision 11 to the Updated Safety Analysis Report (USAR) for the Perry Nuclear Power Plant (PNPP). This submittal reflects facility and procedure changes made between May 3, 1999 (the end of the PNPP seventh refueling outage) and March 23, 2001 (the end of the PNPP eighth refueling outage), and, in selected cases, more recent information.

The changes are identified by sidebars. Please replace the revised pages in accordance with the Instruction Sheet included in the revision package. A List of Effective Pages has also been included for use in verifying the USAR content following insertion of the revised pages.

Regulatory Guide 1.181, "Content of the Updated Final Safety Analysis Report in Accordance with 10 CFR 50.71(e)", endorses NEI 98-03, "Guidelines for Updating Final Safety Analysis Reports", as providing guidelines for updating USARs. The guidelines include a requirement for periodically reporting information that has been deleted from the USAR. Attachment 2 contains a description of the information that has been deleted from the PNPP USAR.

This submittal also reports changes to the PNPP Quality Assurance Program pursuant to 10 CFR 50.54(a). A summary of the Quality Assurance changes is provided in Attachment 1.

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No regulatory commitments are contained within this letter, attachment, or enclosures. If you have questions or require additional information, please contact Mr. Gregory A. Dunn, Manager - Regulatory Affairs, at (440) 280-5305.

Very truly yours,

A handwritten signature in black ink, appearing to read "John K. Hood". The signature is fluid and cursive, with the first name "John" and last name "Hood" clearly distinguishable.

Enclosure

Attachments

cc: NRC Project Manager
NRC Resident Inspector
NRC Region III

Changes to the Quality Assurance Program

- A. The changes to the Updated Safety Analysis Report (USAR) described below were implemented under 10 CFR 50.59. The changes were determined not to be reductions in commitment to the Quality Assurance (QA) Program pursuant to 10 CFR 50.54(a).
1. USAR Appendix 1A and Section 13.4: Clarified the staffing requirements and responsibilities associated with performing the Independent Safety Engineering function.
 2. USAR Section 1.8: Clarified the descriptions of Regulatory Guides 1.2, 1.31, and 1.44 contained in Table 1.8-1. The clarifications are considered editorial.
 3. USAR Section 1.8: Revised the descriptions of Regulatory Guides 1.108 and 1.129 contained in Table 1.8-1. The descriptions changed as a result of implementing License Amendment 115, dated August 29, 2000.
 4. USAR Sections 13.1 and 13.4: Revised the on-site and off-site organizations to incorporate the Oversight and Process Improvement Department and transferred the site quality assurance functions to this Department.
- B. The changes to the USAR described below were determined to be reductions in commitment to the QA Program in accordance with 10 CFR 50.54(a). These changes require NRC review and approval prior to implementation.
1. USAR Section 17.2: The QA Program description was deleted and replaced with the FirstEnergy Nuclear Operating Company (FENOC) Quality Assurance Program Manual (QAPM). The QAPM was implemented by FENOC as a standard QA Program for the FENOC nuclear facilities. The incorporation of the FENOC QAPM was requested from the NRC by letters dated August 19, 1999, November 11, 1999, and October 14, 1999. The NRC, as documented in a letter dated December 8, 1999, approved the request. The change was implemented on January 10, 2000.
 2. USAR Section 1.8 and the FENOC QAPM: The QA Program has been updated to incorporate several revised positions. This update also replaced the Beaver Valley Units 1 and 2 (FENOC nuclear facilities) QA Programs with the FENOC QAPM. These actions were requested from the NRC by letters dated December 27, 2000, June 4, 2001, and June 28, 2001. The NRC, as documented in letter dated August 17, 2001, approved the request. These changes have not yet been implemented at the FENOC facilities.

Information Removed From the Updated Safety Analysis Report


In accordance with NEI 98-03, Revision 1, "Guidelines for Updating Final Safety Analysis Reports", licensees are required to 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 listing of the major information removed from the USAR and the basis for removal.

1. USAR Section 3.2: Eliminated the location of components tabulated on a list that contains the safety and seismic classifications of the components. The locations provided were excessively generic. More accurate component location information is provided on USAR drawings or within the text descriptions of the system with which the component is associated.
2. USAR Section 4.1: Provides descriptions of the computer codes used in the analysis of reactor vessel internal components. The descriptions of the code version, history of use, and extent of application were deleted. The computer code descriptions are not being altered. The deleted information is not important to obtain an understanding of the reactor vessel internals analyses.
3. USAR Sections 4.3 and 4.4: Provides information regarding the nuclear (fuel) and thermal-hydraulic designs of the Perry Nuclear Power Plant (PNPP). The Sections are based upon the General Electric fuel topical report. The information deleted ensures the PNPP USAR better aligns with the topical report. The topical report is incorporated by reference, as such, is considered an integral part of the nuclear and thermal-hydraulic design descriptions.
4. USAR Section 9.2: Eliminated the Potable Water System drawing. The text provides a description of the significant features of the Potable Water System. This description is consistent with the recommendations of Regulatory Guide 1.70 and the Standard Review Plan. The drawing was redundant to this text description.
5. USAR Section 17.2: The QA Program description was deleted and replaced with a reference to the FirstEnergy Nuclear Operating Company (FENOC) Quality Assurance Program Manual (QAPM). The QAPM was implemented by FENOC as a standard QA Program for the FENOC nuclear facilities. The incorporation of the FENOC QAPM was requested from the NRC pursuant to 10 CFR 50.54(a), by letters dated August 19, 1999, November 11, 1999, and October 14, 1999. The NRC, as documented in a letter dated December 8, 1999, approved the request. The change was implemented on January 10, 2000.
6. Various USAR Sections: Eliminated references and information associated with PNPP Unit 2. PNPP Unit 2 was not completed. Therefore, the Unit 2 information is extraneous and is not needed to understand the design or operation of Unit 1.

I, John K. Wood, hereby affirm that (1) I am Vice President - Perry, of the FirstEnergy Nuclear Operating Company, (2) I am duly authorized to execute and file this certification as the duly authorized agent for The Cleveland Electric Illuminating Company, Toledo Edison Company, Ohio Edison Company, and Pennsylvania Power Company, and (3) the statements set forth herein are true and correct to the best of my knowledge, information and belief.


John K. Wood

Subscribed to and affirmed before me, the 10th day of September, 2001



Sheryl A. Eckelberry
Notary Public
State of Ohio
My Commission Expires:
June 10, 2004