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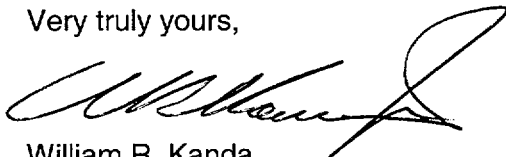
Perry Nuclear Power Plant
Docket No. 50-440
Submission of In-Service Testing Program Relief Request

Ladies and Gentlemen:

In accordance with 10 CFR 50.55a(a)(3)(i), a relief request for the Perry Nuclear Power Plant (PNPP) In-Service Testing Program is being requested. Attachment 1 contains Relief Request VR-11, which proposes implementation of American Society of Mechanical Engineers (ASME) Operations and Maintenance (OM) Code Case, OMN-2, "Thermal Relief Valve Code Case, OM Code-1995, Appendix I." Relief Request VR-11 identifies the affected components, the applicable code requirements, the description and basis of the proposed relief request, as well as the proposed alternate requirements. PNPP desires to implement Relief Request VR-11 during its second 120-month interval.

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

Very truly yours,



William R. Kanda
Vice President – Nuclear

Attachment

cc: NRC Resident Inspector
NRC Project Manager
NRC Region III

A047

Valve Relief Request

VR-11

Systems: Residual Heat Removal, Low Pressure Core Spray, High Pressure Core Spray, Reactor Core Isolation Cooling, Fuel Pool Cooling and Cleanup, Emergency Closed Cooling, Emergency Service Water, Control Complex Chilled Water, Fire Protection, Reactor Water Cleanup, Post Accident Sampling, Liquid Radwaste, Nuclear Closed Cooling and Containment Vessel Chilled Water Systems.

Valves:

1E12-F005	1E12-F017A	1E12-F017B	1E12-F017C	1E12-F025A	1E12-F025B
1E12-F025C	1E21-F031	1E22-F014	1E22-F035	1E51-F017	0G41-F548A
0G41-F548B	1G33-F646	1G50-F823	1P42-F540	1P42-F566A	1P42-F566B
1P42-F566C	1P42-F570	1P43-F851	1P43-F852	1P45-F517	1P45-F520
1P45-F543A	1P45-F543B	1P45-F571A	1P45-F571B	0P47-F574A	0P47-F574B
0P47-F574C	1P50-F606	1P54-F5604	1P87-F277		

Category: C and AC

Class: 2 and 3

Function: These devices provide pressure relief to protect isolated components from fluid expansion caused by changes in fluid temperature.

Test Requirement: Class 2 and 3 relief valves within the scope of the American Society of Mechanical Engineers (ASME) Operations and Maintenance (OM) Code 1995, Appendix I, paragraph I 1.1, shall be tested per the requirements of ASME OM Code 1995, Appendix I, paragraphs I 1.3.5(a), (b), and (c).

Basis for Relief: The ASME OM Code Committee performed a review of the Nuclear Plant Reliability Database System (NPRDS) database and determined that the failure rates of thermal relief valves was limited. As a result, the Code Committee developed Code Case OMN-2 which permits a 10-year valve test or replacement frequency as well as elimination of the test sample expansion if a test failure were to occur.

This Code Case is in the process of being approved for generic use by the NRC as documented in Draft Regulatory Guide DG-1089, "Operation and Maintenance Code Case Acceptability, ASME OM Code", December 2001.

The Perry Nuclear Power Plant (PNPP) staff desires to exercise this Code Case prior to final approval of the regulatory guide. Therefore, the PNPP staff is submitting this relief request for review and approval.

A review of the system design specifications and over pressure protection analysis generated the aforementioned list of thermal relief valves.

Alternate Testing: Implement the alternative requirements of Code Case OMN-2 for the testing or replacement of ASME Code Class 2 and 3 thermal relief valves.

Code Case OMN-2 allows Class 2 and 3 pressure relief valves to be tested or replaced once every 10 years, unless performance data indicates more frequent testing or replacement is needed to assure valve function.

Pursuant to 10 CFR 50.55a(a)(3)(i), implementation of the alternative requirements of Code Case OMN-2 will provide an acceptable level of quality and safety.