Docket No. 50-440

Mr. Alvin Kaplan, Vice President Nuclear Group The Cleveland Electric Illuminating Company 10 Center Road Perry, Ohio 44081

Dear Mr. Kaplan:

DISTRIBUTION Docket File GPA/PA NRC & Local PDR's PD31 Plant Gray AD/Region Licensing Assistant

Project Manager OGC-Bethesda E. Jordan ACRS (10)

ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT -SUBJECT:

APPENDIX J EXEMPTION (TAC NO. 66286)

Re: Perry Nuclear Power Plant, Unit No. 1

Enclosed is a copy of an "Environmental Assessment and Finding of No Significant Impact" for your information. This Notice relates to your application dated September 11, 1987, for an exemption from the requirements of Appendix J to 10 CFR Part 50 for the Perry Nuclear Power Plant, Unit No. 1.

This Notice is being forwarded to the Office of the Federal Register for publication

Sincerely,

Original signed by

Timothy G. Colburn, Project Manager Project Directorate III-1 Division of Reactor Projects - III, IV, V and Special Projects

Enclosure:

Environmental Assessment

cc w/enclosure: See next page

NLA/PD31: DRSP RIngram 01/13 /88

PM/PD31: DRSP TColburn: cr 01/14/88

D/PD31:DRSP MVirgilio 01//4/88

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OFFICIAL RECORD COPY

Mr. Alvin Kaplan The Cleveland Electric Illuminating Company

cc: Shaw, Pittman, Potts & Trowbridge 2300 N Street, N.W. Washington, D.C. 20037

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Mr. James W. Harris, Director Division of Power Generation Ohio Department of Industrial Relations P.O. Box 825 Columbus, Ohio 43216

The Honorable Lawrence Logan Mayor, Village of Perry 4203 Harper Street Perry, Ohio 44081

The Honorable Robert V. Orosz Mayor, Village of North Perry North Perry Village Hall 4778 Lockwood Road North Perry Village, Ohio 44081

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UNITED STATES NUCLEAR REGULATORY COMMISSION THE CLEVELAND ILLUMINATING COMPANY, ET AL

DOCKET NO. 50-440

ENVIRONMENTAL ASSESSMENT AND

FINDINGS OF NO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an exemption from the schedular requirements of Appendix J to 10 CFR Part 50 to The Cleveland Electric Illuminating Company (CEI), Duquesne Light Company, Ohio Edison Company, Pennsylvania Power Company, and Toledo Edison Company (the licensees) for the Perry Nuclear Power Plant, Unit No. 1, located at the licensees' site in Lake County, Ohio. The exemption was requested by the licensees by letter from CEI dated September 11, 1987.

ENVIRONMENTAL ASSESSMENT

<u>Identification of Proposed Action</u>:

The exemption will provide, for 14 containment isolation valves, a one-time relief from the requirement of Section III.D.3 of Appendix J, 10 CFR Part 50, to perform Type C local leak rate tests (LLRTs) at each plant shutdown for refueling but in no case at intervals greater than two years. The licensees have proposed to conduct these tests prior to startup from the first refueling outage currently scheduled for January 1989.

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The Need for the Proposed Action:

The end of the initial 24-month testing intervals for most of the Perry Nuclear Power Plant containment isolation valves is approaching in early 1988. With the exception of these 14 valves, the licensees either have, or plan to perform the required Type C tests. Many of the tests were conducted during the maintenance outage in July/August 1987. The licensees have stated that due to plant constraints it was not possible to perform the testing of these 14 valves without extending the outage solely for the purpose of these tests.

The licensees have further indicated that it is not desirable for them to schedule an additional outage, nor to extend other scheduled outages, for the sole purpose of performing these LLRTs, as this would result in a net increase in overall outage time or would subject the plant equipment and systems to the detrimental effects inherent in an additional shutdown and startup operation.

Testing of the valves covered by the requested exemption would require one or more of the following plant conditions:

- 1) Drywell head removal.
- Both Residual Heat Removal (RHR) shutdown cooling loops rendered inoperable.
- 3) Reducing the number of Emergency Core Cooling System (ECCS) and or shutdown cooling loops below the Technical Specification required systems (when taken in conjunction with other planned necessary outage work).

The licensees do not plan to remove the drywell head until the first refueling outage. To render both loops of RHR shutdown cooling inoperable, the licensees would either be required to remove the drywell and reactor heads and flood the vessel, or wait until decay heat is reduced such that ambient losses are sufficient to maintain cold shutdown. The next scheduled outage of this duration is the first refueling outage.

Environmental Impacts of the Proposed Action:

The licensees have indicated that Type C LLRTs will have been completed for the valves covered by the requested exemption prior to their exposure to an operating environment of greater than 24 months due to the low power testing environment the valves were exposed to prior to January 1987. Further, the licensees have surveyed industry LLRT data for valves of this type and have determined that for all types of valves identified in the requested exemption, the failure rates were low (on the order of 5-6%, worst case). In cases where one-time extensions had been granted at other nuclear power plants, the majority of valves subject to the extensions exhibited the same or lower leakage rates as had been identified in previous tests. Therefore, the licensees have concluded that the granting of the requested exemption would not present a significantly increased probability of containment leakage other than contemplated in Appendix J.

The Commission's staff has determined that granting the proposed exemption would not significantly increase the probability or amount of expected containment leakage and that containment integrity would thus be maintained. Consequently, the probability of accidents would not be increased, nor would the post-accident radiological releases be greater than previously determined. Neither would the proposed exemption otherwise affect radiological plant effluents. Therefore, the Commission concludes that there are no significant radiological environmental impacts associated with the proposed exemption.

With regard to potential nonradiological impacts, the proposed exemption involves a change to surveillance and testing requirements. It does not affect nonradiological plant effluents and has no other environmental impact. Therefore, the Commission concludes that there are no significant nonradiological environmental impacts associated with the proposed exemption.

Alternatives to the Proposed Action:

Because the Commission has concluded that there is no significant environmental impact associated with the proposed exemption, any alternative would have either no or greater environmental impact. The principal alternative would be to deny the requested exemption. This would not reduce the environmental impacts attributed to the facility but would result in an outage of considerable duration with attendant costs and would result in an unnecessary loss of power to the grid when the distribution system's need for power is high.

Alternative Use of Resources:

This action involves no use of resources not previously considered in connection with the "Final Environmental Statement Related to Operation of the Perry Nuclear Power Plant, Units 1 and 2," dated August 1987.

Agencies and Persons Consulted:

The Commission's staff reviewed the licensees' request and did not consult other agencies or persons. The State of Ohio was consulted with regard to a related Technical Specification change to the Perry Nuclear Power Plant Facility Operating License.

FINDING OF NO SIGNIFICANT IMPACT

The Commission has determined not to prepare an environmental impact statement for the proposed exemption.

Based upon the foregoing environmental assessment, we conclude that the proposed action will not have a significant effect on the quality of the human environment.

For further details with aspect to this action, see the application for exemption dated September 11, 1987, which is available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C., and at the Perry Public Library, 3753 Main Street, Perry, Ohio 44081.

Dated at Bethesda, Maryland, this 19th day of January, 1988.

FOR THE NUCLEAR REGULATORY COMMISSION

Martin J. Virgilio, Director Project Directorate III-1

Division of Reactor Projects - III, IV, V and Special Projects