January 20, 1995

Distribution w/encls:

Docket File	GHill(2)
PUBLIC	OGC
PD3-3 Reading	CGrimes
ACRS(4)	
OPA	
OC/LFDCB	
EGreenman, RIII	
JRoe	

Mr. Robert A. Stratman
Vice President Nuclear - Perry
Centerior Service Company
P. O. Box 97, A200
Perry, OH 44081

SUBJECT: AMENDMENT NO. 68 TO FACILITY OPERATING LICENSE NO. NPF-58 - PERRY NUCLEAR POWER PLANT, UNIT NO. 1 (TAC NO. M90428)

Dear Mr. Stratman:

The Commission has issued the enclosed Amendment No. 68 to Facility Operating License No. NPF-58 for the Perry Nuclear Power Plant, Unit No. 1. This amendment revises the Technical Specifications in response to your application dated September 19, 1994.

This amendment revises the snubber visual inspection schedule.

A copy of the Safety Evaluation is also enclosed. Notice of issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

Original signed by Jon B. Hopkins

Jon B. Hopkins, Senior Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-440

Enclosures: 1. Amendment No. 68 to License No. NPF-58
2. Safety Evaluation

cc w/encls: See next page

DOCUMENT NAME: G:\PERRY\PER90428.AMD

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	LA:PDIII-3 E	PM:PDIII-3 E	PD:PDIII-3	OGC-NO	BC:EMEB C
NAME	MRushbrook	JHopkins:gll	LNorrholm	MZobler	RWessman
DATE	12/14/94	12/14/94	1/29/95	12/29/94	12/15/94

OFFICIAL RECORD COPY

1-20-95

#1-12/15

Sub Tech to noted correction change made. 1-20-95

9501270269 950120
PDR ADOCK 05000440
P PDR

DF01

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 20, 1995

Mr. Robert A. Stratman
Vice President Nuclear - Perry
Centerior Service Company
P. O. Box 97, A200
Perry, OH 44081

SUBJECT: AMENDMENT NO. 68 TO FACILITY OPERATING LICENSE NO. NPF-58 - PERRY NUCLEAR POWER PLANT, UNIT NO. 1 (TAC NO. M90428)

Dear Mr. Stratman:

The Commission has issued the enclosed Amendment No. 68 to Facility Operating License No. NPF-58 for the Perry Nuclear Power Plant, Unit No. 1. This amendment revises the Technical Specifications in response to your application dated September 19, 1994.

This amendment revises the snubber visual inspection schedule.

A copy of the Safety Evaluation is also enclosed. Notice of issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

Jon B. Hopkins, Senior Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-440

Enclosures: 1. Amendment No. 68 to License No. NPF-58
2. Safety Evaluation

cc w/encls: See next page

Mr. Robert A. Stratman
Centerior Service Company

cc:

Jay E. Silberg, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N. W.
Washington, D. C. 20037

Mary E. O'Reilly
Centerior Energy Corporation
300 Madison Avenue
Toledo, Ohio 43652

Resident Inspector's Office
U. S. Nuclear Regulatory Commission
Parmly at Center Road
Perry, Ohio 44081

Regional Administrator, Region III
U. S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4531

Lake County Prosecutor
Lake County Administration Bldg.
105 Main Street
Painesville, Ohio 44077

Ms. Sue Hiatt
OCRE Interim Representative
8275 Munson
Mentor, Ohio 44060

Terry J. Lodge, Esq.
618 N. Michigan Street, Suite 105
Toledo, Ohio 43624

Ashtabula County Prosecutor
25 West Jefferson Street
Jefferson, Ohio 44047

Regulatory Affairs Manager
Cleveland Electric Illuminating
Company
Perry Nuclear Power Plant
P. O. Box 97, E-210
Perry, Ohio 44081

James R. Williams, Chief of Staff
Ohio Emergency Management Agency
2825 West Granville Road
Worthington, Ohio 43085

Perry Nuclear Power Plant
Unit No. 1

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

Attorney General
Department of Attorney General
30 East Broad Street
Columbus, Ohio 43216

Radiological Health Program
Ohio Department of Health
Post Office Box 118
Columbus, Ohio 43266-0118

Ohio Environmental Protection
Agency
DERR--Compliance Unit
ATTN: Zack A. Clayton
P. O. Box 1049
Columbus, Ohio 43266-0149

Mr. Thomas Haas, Chairman
Perry Township Board of Trustees
3750 Center Rd., Box 65
Perry, Ohio 44081

State of Ohio
Public Utilities Commission
East Broad Street
Columbus, Ohio 43266-0573

David P. Igyarto, Plant Manager
Cleveland Electric Illuminating
Company
Perry Nuclear Power Plant
P. O. Box 97, SB306
Perry, Ohio 44081

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, ET AL.

DOCKET NO. 50-440

PERRY NUCLEAR POWER PLANT, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 68
License No. NPF-58

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by The Cleveland Electric Illuminating Company, Centerior Service Company, Duquesne Light Company, Ohio Edison Company, Pennsylvania Power Company, and Toledo Edison Company (the licensees) dated September 19, 1994, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-58 is hereby amended to read as follows:

9501270278 950120
PDR ADOCK 05000440
P PDR

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 68 are hereby incorporated into this license. The Cleveland Electric Illuminating Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented not later than 90 days after issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Jon B. Hopkins, Senior Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of issuance: January 20, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 68

FACILITY OPERATING LICENSE NO. NPF-58

DOCKET NO. 50-440

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

Remove	Insert
3/4 7-8	3/4 7-8
3/4 7-9	3/4 7-9
-------	3/4 7-12a
-------	3/4 7-12b
B 3/4 7-2	B 3/4 7-2

3/4.7.4 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.4 All snubbers shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3. OPERATIONAL CONDITIONS 4 and 5 for snubbers located on systems required OPERABLE in those OPERATIONAL CONDITIONS.

ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.4.g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.4 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

A visual inspection of all snubbers shall be performed according to the schedule determined by Table 4.7.4.1. Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently. The visual inspection for each type of snubber shall be determined based on the criteria provided in Table 4.7.4-1 and the initial inspection interval utilizing this criteria shall be 18-months, beginning from the conclusion of the last visual inspection conducted during RF04.

SURVEILLANCE REQUIREMENTS (Continued)

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that (1) there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are secure. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable; however, they may be reclassified acceptable for the purpose of establishing the next visual inspection interval, providing that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type on that system that may be generically susceptible; and/or (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specifications 4.7.4.f. For those snubbers common to more than one system, the OPERABILITY of such snubbers shall be considered in assessing the surveillance schedule for each of the related systems.

d. Transient Event Inspection

An inspection shall be performed of all snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients, as determined from a review of operational data or a visual inspection of the systems, within 72 hours for accessible systems and 6 months for inaccessible systems following this determination. In addition to satisfying the visual inspection acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.

TABLE 4.7.4-1
SNUBBER VISUAL INSPECTION INTERVAL

Population or Category (Notes 1 and 2)	NUMBER OF UNACCEPTABLE SNUBBERS Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 7)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, PNPP must make and document that decision before any inspection and shall use that decision as the basis upon which to determine the next inspection interval for that category.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use the next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

TABLE 4.7.4-1 (continued)

Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.

Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation; that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the difference in the snubbers in Columns B and C.

Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

3/4.7.4 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2-kip, 10-kip, and 100-kip capacity manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" for the purposes of this Technical Specification would be of a different type, as would hydraulic snubbers from either manufacturer.

A list of individual snubbers with detailed information of snubber location and size and of system affected shall be available at the plant in accordance with Section 50.71(c) of 10 CFR Part 50. The accessibility of each snubber shall be determined and approved by the Plant Operations Review Committee. The determination shall be based upon the existing radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location, etc.), and the recommendations of Regulatory Guide 8.8 and 8.10. The addition or deletion of any snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to each safety-related system. Therefore, the required inspection interval is determined by the number of inoperable snubbers found during an inspection of each system, the total population or category size for each snubber type, and the previous inspection interval. In order to establish the inspection frequency for each type of snubber on a safety-related system, it was assumed that the frequency of snubber failures and initiating events is constant with time and that the failure of any snubber on that system could cause the system to be unprotected and to result in failure during an assumed initiating event. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. Any inspection whose results required a shorter inspection interval will override the previous schedule.

The acceptance criteria are to be used in the visual inspection to determine OPERABILITY of the snubbers.

To provide assurance of snubber functional reliability one of three functional testing methods is used with the stated acceptance criteria:

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 68 TO FACILITY OPERATING LICENSE NO. NPF-58

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, ET AL.

PERRY NUCLEAR POWER PLANT, UNIT NO. 1

DOCKET NO. 50-440

1.0 INTRODUCTION

By letter dated September 19, 1994, the Cleveland Electric Illuminating Company, et al. (licensees), proposed changes to the Technical Specifications (TSs) for the Perry Nuclear Power Plant, Unit No. 1. The proposed changes involve TS 3/4.7.4, "Snubbers," and its bases. The proposed changes provide alternative requirements for snubbers based on the guidance contained in NRC Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated December 11, 1990.

By Telecon of December 12, 1994, the licensee (R. Cook) requested NRC (J. Hopkins) that the two footnotes on the bottom of TS page 3/4 7-9 also be deleted. This change is administrative in nature, and does not significantly change the application as noticed in the Federal Register, and does not change the staff's evaluation of the application. Therefore, the application is not being renoticed.

2.0 EVALUATION

Technical Specifications impose surveillance requirements for visual inspection and functional testing of all safety-related snubbers. A visual inspection is the observation of the condition of installed snubbers to identify those that are damaged, degraded, or inoperable as caused by physical means, leakage, corrosion, or environmental exposure. To verify that a snubber can operate within specific performance limits, the licensees perform functional testing that typically involves removing the snubber and testing it on a specially-designed test stand. Functional testing provides a 95 percent confidence level that 90 to 100 percent of the snubbers operate within the specified acceptance limits. The performance of visual examinations is a separate process that complements the functional testing program and provides additional confidence in snubber operability.

Existing schedules for snubber visual inspections are based only on the number of inoperable snubbers found during the previous visual inspection, irrespective of the size of the snubber population. Licensees having a large number of snubbers find that the visual inspection schedule to be excessive. Some licensees have spent a significant amount of resources, and have subjected plant personnel to unnecessary radiological exposure to comply with the visual examination schedule.

9501270289 950120
PDR ADOCK 05000440
P PDR

The alternate inspection schedule contained in GL 90-09 is based on the number of unacceptable snubbers found during the previous inspection, in proportion to the sizes of the various snubbers' populations or categories. The staff stated in GL 90-09, that the alternate schedule for visual inspections maintains the same confidence level as the existing schedule and generally will allow the licensee to perform visual inspections and corrective actions during plant outages. This will reduce future occupational radiation exposure.

The requested amendment differs slightly from the model TS contained in GL 90-09, in that the initial inspection period is proposed to be 18 months from the last visual snubber inspection, in order to perform the next inspection during its next refueling outage. The model TS would have the next inspection of inaccessible snubbers 12 months from the last inspection, based on initially using the old inspection schedule and on finding one inoperable snubber, which would result in a mid-cycle shutdown. Based on the model TS, the next inspection of accessible snubbers would be 6 months from the last inspection based on initially using the old inspection schedule, and on finding two inoperable snubbers. The three inoperable snubbers have had corrective action taken to make them operable. Perry has a total of approximately 1200 snubbers divided fairly, evenly between accessible and inaccessible. Previously, except for the first and most recent visual inspection, Perry performed visual inspections based on their inspection plan, which was a 10 percent sample of snubbers. Converting to the GL 90-09 inspection criteria is an improvement over the 10 percent sample inspection plan. Also, a total of three inoperable snubbers out of 1200 snubbers is not a large percentage, and does not warrant a mid-cycle shutdown. Lastly, an 18-month interval is commensurate with the future inspection schedule. Therefore, the NRC staff finds that the initial visual inspection interval of 18 months is acceptable.

The NRC staff has reviewed the licensee's proposed TS changes and finds that except as discussed above, they are consistent with the guidance contained in GL 90-09. Therefore, the license amendment is acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Ohio State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluent that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding

(59 FR 53843). Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

5.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: J. Hopkins

Date: January 20, 1995