



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 27, 1999

Mr. Lew W. Myers
Vice President - Nuclear, Perry
FirstEnergy Nuclear Operating Company
P.O. Box 97, A200
Perry, OH 44081

SUBJECT: CLARIFICATION TO AMENDMENT NO. 105 - PERRY NUCLEAR POWER
PLANT (TAC NO. MA3487)

Dear Mr. Myers:

By letter dated March 26, 1999, the U.S. Nuclear Regulatory Commission issued Amendment No. 105 to Facility Operating License No. NPF-58 for the Perry Nuclear Power Plant, Unit 1. This amendment revised the design and licensing basis of the containment isolation valves in the feedwater system. In addition, the amendment revised (1) Surveillance Requirement 3.6.1.3.11 of Technical Specification (TS) 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)" to exclude the feedwater check valves from the hydrostatic test program, (2) TS 5.5.2, "Primary Coolant Sources Outside Containment," to stipulate that water leakage past the feedwater motor-operated containment isolation valves and the reactor water cleanup system return to feedwater line is added to the program, and (3) TS 5.5.12, "Primary Containment Leakage Rate Testing Program," to state that the feedwater check valves will be tested in accordance with the Inservice Testing Program (TS 5.5.6).

By letter dated April 14, 1999 (PY-CEI/NRR-2387L), FirstEnergy provided comments on the staff's safety evaluation (SE) supporting Amendment No. 105 along with a discussion of the leak rate testing that has been performed on the feedwater check valves during the current refueling outage.

Section 3.1, "Impact on Containment Isolation Provisions," of the staff's SE discusses the proposed leak rate testing and the acceptance criteria for the feedwater check valves. As described on page 6 of the SE, the staff concluded that an acceptance criteria of 200 gpm per feedwater penetration when tested at $\geq 1.1 P_a$ would be sufficient to ensure that the feedwater check valves would perform their safety function to preclude significant leakage for a postulated feedwater line break outside containment. The SE further discussed the staff's understanding that the existing test configuration would limit the feedwater flow to 19 gpm such that the acceptance criteria for the current refueling outage would need to be less than 19 gpm.

The staff did not intend to limit the acceptance criteria for the current refueling outage to 19 gpm. Rather, we were attempting to describe our understanding of how the tests would be performed. As stated in the safety evaluation:

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The licensee is considering changes to the feedwater penetration line to allow for tests at higher leak rates in the future, or to continue to pursue the visual inspection option by developing a means to ensure that the leakage is within the 200 gpm allowable.

Your letter of April 14, 1999, described a revised test methodology that has been used for the feedwater check valves. Your letter further states that this revised test methodology provides a more accurate means of determining leak rates and that all feedwater check valves have demonstrated leak rates less than the 200 gpm acceptance criteria.

The staff has reviewed the information in your letter and concludes that the revised test methodology provides an adequate means to demonstrate check valve leakage. In addition, the staff finds the leak rate testing for the feedwater check valves to be acceptable because they are within the acceptance criteria of 200 gpm per feedwater penetration.

Finally, discussions with your staff identified concerns about our SE referencing Option A, "Prescriptive Requirements," of 10 CFR 50, Appendix J. The staff understands that Perry has adopted Option B, "Performance-Based Requirements," of 10 CFR 50, Appendix J. The references are intended to describe the adequacy of the Perry seal water system and do not limit, or restrict, your use of the performance-based testing requirements of Option B.

Please feel free to contact me at (301)-415-1364 if I can offer any further clarifications.

Sincerely,

Original Signed By

Douglas V. Pickett, Senior Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-440

cc: See next page

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L. Myers
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