50-440



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 15, 1999

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

SUBJECT:

CORRECTION TO AMENDMENT NO. 101 - PERRY NUCLEAR POWER PLANT

(TAC NO. MA2290)

Dear Mr. Myers:

By letter dated March 3, 1999, the U.S. Nuclear Regulatory Commission (NRC) issued Amendment No. 101 to Facility Operating License No. NPF-58 for the Perry Nuclear Power Plant, Unit 1. This amendment revised Technical Specification 3.4.4, "Safety/Relief Valves (SRVs)," by increasing the existing ±1% tolerance on the safety mode lift setpoint for the safety relief valves to ±3%.

Your staff recently informed us of two discrepancies in the NRC's safety evaluation supporting Amendment No. 101. The first involves clarification between the as-found and as-left setpoint tolerance condition whereas the second involves overspeed protection for the reactor core isolation cooling (RCIC) turbine/pump.

As-found and As-left Setpoint Tolerance Condition

Page 2 of the staff's safety evaluation, Section 3.0, "EVALUATION," states:

The proposed modifications would provide a $\pm 3\%$ as-found tolerance and $\pm 1\%$ as-left setpoint tolerance.

The above statement correctly states that the new acceptance criteria for the as-found SRV lift setpoint will be $\pm 3\%$ and that the SRVs will be recalibrated to within $\pm 1\%$ for the as-left condition.

However, page 5 of the staff's safety evaluation, Section 3.7, "Containment Response/ Hydrodynamic Loads," states:

... when using the proposed acceptance criterion of $\pm 3\%$, an individual SRV would not need to be recalibrated provided the as-found setpoint was found to be within the $\pm 3\%$ tolerance limit. However, if the as-found setpoint was found to be outside the $\pm 3\%$ tolerance limit, the SRV would be recalibrated to within $\pm 1\%$.

The staff recognizes that the two sentences above are incorrect. As previously stated, the new acceptance criteria for the as-found SRV lift setpoint will be $\pm 3\%$. The staff understands that any SRV found to be outside of its $\pm 1\%$ setpoint limit will be recalibrated such that the as-left condition for all SRVs tested will be within $\pm 1\%$ of the setpoint limits.

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RCIC Turbine/Pump Overspeed Protection

Page 3 of the staff's safety evaluation, Section 3.4, "Reevaluation of the Performance of High Pressure Systems," describes the impact of increasing the maximum speed of the RCIC turbine/pump and states:

The RCIC turbine/pump maximum speed is increased from 4550 rpm to 4600 rpm in order for the RCIC system to perform at the new maximum reactor operating pressure. The increased speed reduces the over-speed margin from 125% to 122.3%. This reduction in margin is acceptable due to the system modifications to the turbine start feature.

The staff understands that the RCIC turbine/pump start feature was not modified as described in GE Service Information Letter No. 377. However, the staff still finds the reduction in over-speed margin to be acceptable because the probability of turbine over-speed trips has not been significantly increased.

We apologize for any inconvenience this may have caused.

Sincerely,

Douglas V. Pickett, Senior Project Manager

Project Directorate III

Division of Licensing Project Management Office of Nuclear Reactor Regulation

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cc: see next page

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Original signed by
Douglas V. Pickett, Senior Project Manager
Project Directorate III-2
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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