

50-440



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

March 17, 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. 97 - PERRY NUCLEAR POWER PLANT
(TAC NO. MA2217)

Dear Mr. Myers:

By letter dated February 8, 1999, the U.S. Nuclear Regulatory Commission issued Amendment No. 97 to Facility Operating License No. NPF-58 for the Perry Nuclear Power Plant, Unit 1. This amendment revised Technical Specification 3.1.7, "Standby Liquid Control System," by increasing the boron concentration in the Standby Liquid Control System for Cycle 8 fuel design.

Your staff recently informed us of an apparent discrepancy in the NRC's safety evaluation supporting Amendment No. 97. Specifically, the sixth paragraph of section 3.0, "Evaluation," discusses the staff's belief that a test would be performed during your upcoming refueling outage to demonstrate the adequacy of the net positive suction head (NPSH) of the standby liquid control system pump. This paragraph reads as follows:

Since the boron concentration is increased, the required pump flow is reduced from 41.2 gpm to 32.4 gpm. The licensee verified by calculation that there is sufficient NPSH margin for the pump taking into consideration the new flow rate and system losses. The licensee verified that the existing minimum discharge pressure of 1220 psig is not impacted. The margin for the system relief valve is not reduced. The licensee has informed us that they will perform tests to verify the pump NPSH and the relief valve setting before the start-up of Cycle 8.

Your staff has informed us that pump NPSH was determined by calculation and that it was never your intent to perform tests to demonstrate pump NPSH. In order to perform tests, the sodium pentaborate of the standby liquid control system tanks would have to be flushed out and replaced with water. This would represent an operational and economic hardship with minimal practical benefit. The only tests of the standby liquid control system for the upcoming outage are those to demonstrate relief valve setting.

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L. Myers

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While the pump NPSH could be tested using the test tank and demineralized water, the staff concurs that tests to demonstrate pump NPSH are not necessary. Furthermore, as stated in the staff's safety evaluation, pump NPSH has been verified by calculation. We apologize for any inconvenience this may have caused.

Sincerely,

A handwritten signature in black ink that reads "Douglas V. Pickett". The signature is written in a cursive style with a checkmark-like flourish above the 'V'.

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

Docket No. 50-440

cc: see next page

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Sincerely,

Original signed by:

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

Docket No. 50-440

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

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L. Myers
FirstEnergy Nuclear Operating Company

cc:

Mary E. O'Reilly
FirstEnergy Corporation
76 South Main St.
Akron, OH 44308

Resident Inspector's Office
U.S. Nuclear Regulatory Commission
P.O. Box 331
Perry, OH 44081-0331

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

Sue Hiatt
OCRE Interim Representative
8275 Munson
Mentor, OH 44060

Henry L. Hegrat
Regulatory Affairs Manager
FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant
P.O. Box 97, A210
Perry, OH 44081

William R. Kanda, Jr., Plant Manager
FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant
P.O. Box 97, SB306
Perry, OH 44081

Mayor, Village of North Perry
North Perry Village Hall
4778 Lockwood Road
North Perry Village, OH 44081

Donna Owens, Director
Ohio Department of Commerce
Division of Industrial Compliance
Bureau of Operations & Maintenance
6606 Tussing Road
P. O. Box 4009
Reynoldsburg, OH 43068-9009

Perry Nuclear Power Plant, Units 1 and 2

James R. Williams
Chief of Staff
Ohio Emergency Management Agency
2855 West Dublin Granville Road
Columbus, OH 43235-7150

Mayor, Village of Perry
P.O. Box 100
Perry, OH 44081-0100

Radiological Health Program
Ohio Department of Health
P.O. Box 118
Columbus, OH 43266-0118

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

Chairman
Perry Township Board of Trustees
3750 Center Road, Box 65
Perry, OH 44081

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