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January 30, 2003
PY-CEI/NRR-2669L

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Perry Nuclear Power Plant
Docket No. 50-440
License Amendment Request Pursuant to 10 CFR 50.90: Revision to the Perry Nuclear Power Plant Reactor Pressure Vessel Material Surveillance Program

Ladies and Gentlemen:

Nuclear Regulatory Commission (NRC) review and approval of a license amendment for the Perry Nuclear Power Plant (PNPP) is requested. The proposed change revises the reactor pressure vessel material surveillance program described within the PNPP Updated Safety Analysis Report from a plant-specific program to the Boiling Water Reactor Vessel and Internals Project (BWRVIP) Integrated Surveillance Program (ISP).

The issue of whether this change from the existing PNPP surveillance program to the ISP needs to be addressed as a license amendment is not clear. This is related to the applicability of Commission Memorandum and Order CLI 96-13 and the need for license amendments, which is being addressed generically between the Nuclear Energy Institute (NEI) and the NRC. However, consistent with the process established between the NRC and the BWRVIP, this change is being processed as a license amendment to facilitate NRC review and approval.

Approval of the license amendment is requested prior to September 1, 2003, with the amendment being implemented within 90 days following the approval of the amendment. The approval date was administratively selected to allow for NRC review; however, the plant does not require this amendment to allow continued safe full power operation. Approval of this amendment reflects a cost beneficial licensing change for the BWR licensees based upon anticipated cost savings due to the sharing of material surveillance data.

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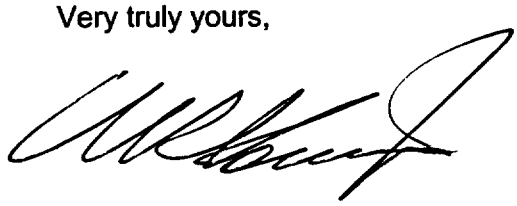
If you have questions or require additional information, please contact Mr. Vernon K. Higaki, Manager - Regulatory Affairs, at (440) 280-5294.

Very truly yours,



Attachments

1.) Notarized Affidavit
2.) Description, Background, Technical Analysis, Regulatory Analysis, and Environmental Consideration for the Proposed Change
3.) Significant Hazards Consideration
4.) Proposed Changes to the PNPP Updated Safety Analysis Report
5.) List of Commitments

cc: NRC Project Manager
NRC Resident Inspector
NRC Region III
State of Ohio

I, William R. Kanda, hereby affirm that (1) I am Vice President - Perry, of the FirstEnergy Nuclear Operating Company, (2) I am duly authorized to execute and file this certification as the duly authorized agent for The Cleveland Electric Illuminating Company, Toledo Edison Company, Ohio Edison Company, and Pennsylvania Power Company, and (3) the statements set forth herein are true and correct to the best of my knowledge, information and belief.

William R. Kanda

Subscribed to and affirmed before me, the 30th day of January, 2003

Jane E Mott

JANE E. MOTT
Notary Public, State of Ohio
My Commission Expires Feb. 20, 2005
(Recorded In Lake County)

1.0 DESCRIPTION

This license amendment request proposes to revise the reactor pressure vessel material surveillance program described within the Perry Nuclear Power Plant (PNPP) Updated Safety Analysis Report (USAR) to reflect the participation in the Boiling Water Reactor Vessel and Internals Project (BWRVIP) Integrated Surveillance Program (ISP).

2.0 PROPOSED CHANGE

This license amendment proposes the following changes to the PNPP USAR. Within USAR Section 5.3.1.6.1, "Compliance with 'Reactor Vessel Material Surveillance Program Requirements'", delete the last two paragraphs and replace with Insert 1 which describes the ISP. Within USAR Section 5.3.1.6.2, "Neutron Flux and Fluence Calculations", delete the paragraph and replace with Insert 2 which describes the use of a neutron fluence calculational methodology consistent with Regulatory Guide 1.190, "Calculational and Dosimetry Methods for Determining Pressure Vessel Neutron Fluence." Within USAR Section 5.3.4, "References for Section 5.3", Insert 3 will add the following five references:

1. Boiling Water Reactor Vessel and Internals Project (BWRVIP) BWRVIP-78, "BWR Vessel and Internals Project, BWR Integrated Surveillance Program Plan", EPRI TR-114228, dated December 1999

2. Boiling Water Reactor Vessel and Internals Project (BWRVIP) BWRVIP-86, "BWR Vessel and Internals Project, BWR Integrated Surveillance Program Implementation Plan", EPRI Technical Report 1000888, dated December 2000

3. Letter to U.S. NRC Document Control Desk from Mr. C. Terry, dated December 15, 2000, subject: "Project No. 704 – BWRVIP Response to NRC Request for Additional Information Regarding BWRVIP-78"

4. Letter to U.S. NRC Document Control Desk from Mr. C. Terry, dated May 30, 2001, subject: "Project No. 704 – BWRVIP Response to Second NRC Request for Additional Information on the BWR Integrated Surveillance Program"

5. Letter to Mr. Carl Terry, BWRVIP Chairman, from Mr. William H. Bateman, Nuclear Regulatory Commission, dated February 1, 2002, subject: "Safety Evaluation Regarding EPRI Proprietary Reports 'BWR Vessel and Internals Project, BWR Integrated Surveillance Program Plan (BWRVIP-78)' and 'BWRVIP-86: BWR Vessel and Internals Project, BWR Integrated Surveillance Program Implementation Plan'"

Table 1.8-1, "Conformance to NRC Regulatory Guides" will be updated to reflect conformance with Regulatory Guide 1.190, "Calculational and Dosimetry Methods for Determining Pressure Vessel Neutron Fluence."

The issue of whether this change from the existing PNPP surveillance program to the ISP requires a license amendment is related to the applicability of Commission Memorandum and Order CLI 96-13 and the need for license amendments. This issue is being addressed generically between the Nuclear Energy Institute (NEI) and the NRC. However, consistent with the process established between the NRC and the BWRVIP, this change is being processed as a license amendment to facilitate NRC review and approval.

3.0 BACKGROUND

10CFR50, Appendix A, "General Design Criteria (GDC) for Nuclear Power Plants", Criterion 31, "Fracture Prevention of Reactor Coolant Pressure Boundary", requires, in part, that the reactor coolant pressure boundary be designed with enough margin to ensure that when stressed under various conditions, the boundary will behave in a non-brittle manner and the probability of a rapidly propagating fracture is minimized. 10CFR50, Appendix H, "Reactor Vessel Material Surveillance Program Requirements", in part, implements the requirements of GDC 31. 10CFR50, Appendix H requires that reactor pressure vessels have their beltline regions monitored by a material surveillance program that complies with American Society for Testing and Materials (ASTM) E 185, "Standard Practices for Conducting Surveillance Tests for Light-Water Cooled Nuclear Power Reactor Vessels", except as modified by Appendix H. ASTM E 185 provides guidelines for developing a material surveillance program, selecting materials, and evaluating test results for Reactor Pressure Vessels (RPV). It also provides recommendations for the minimum number of material surveillance capsules and their withdrawal schedule. 10CFR50, Appendix H requires that the proposed withdrawal schedule be submitted to and approved by the NRC prior to implementation.

The PNPP reactor pressure vessel material surveillance program was developed in accordance with 10CFR50, Appendix H and the 1973 edition of ASTM E 185. The program is described in Section 5.3.1.6, "Material Surveillance", of the PNPP USAR. The current PNPP material surveillance capsule withdrawal schedule is contained in USAR Section 5.3.1.6.1.

Over the past several years, the BWRVIP developed the ISP to respond to an issue raised by the NRC staff regarding the potential lack of adequate unirradiated baseline Charpy V-notch (CVN) data for one or more materials in plant-specific reactor pressure vessel surveillance programs at several BWRs. The lack of baseline properties would inhibit a licensee's ability to effectively monitor changes in the fracture toughness properties of reactor pressure vessel materials in accordance with 10CFR50, Appendix H. It should be noted that use of an integrated surveillance program is consistent with 10CFR50, Appendix H. The BWRVIP ISP was submitted to the NRC for review and approval, to close the aforementioned issue. The NRC completed its review of the BWRVIP ISP, and by letter dated February 1, 2002, issued a safety evaluation approving the BWRVIP ISP. Within the NRC safety evaluation, the NRC incorporated two conditions. First, licensees that implement the BWRVIP ISP must use neutron fluence methodologies that are both NRC-approved and are "compatible" with one another. Second, licensees who elect to participate in the BWRVIP ISP must submit a license amendment to the NRC confirming the incorporation of the BWRVIP ISP into their licensing basis.

4.0 TECHNICAL ANALYSIS

When the original RPV surveillance materials were selected for plant-specific material surveillance programs, the state of knowledge concerning RPV material response to irradiation and post-irradiation fracture toughness testing was not as advanced as it is today. As a result, many licencees did not include what would be identified today as the RPV's limiting materials in their material surveillance programs. Given this situation, the NRC had an issue concerning the potential lack of adequate unirradiated baseline Charpy V-notch

(CVN) data for several BWRs. This lack of data would inhibit a licensee's ability to effectively monitor changes in the fracture toughness properties of RPV materials in accordance with 10CFR50, Appendix H.

To resolve the NRC's concern, the BWRVIP developed the BWRVIP ISP. The ISP is based upon material surveillance data taken from the entire BWR-fleet. Since the operating environments within the BWR fleet are similar, use of fleet-wide data improves the quality of data used to determine the effects of radiation embrittlement on RPV materials. The ISP also includes data from the BWR Owners' Group (BWROG) Supplemental Surveillance Program (SSP) material surveillance capsules. The use of the SSP data further improves the quality of the data used to evaluate RPV materials.

The BWRVIP ISP has many benefits over a plant-specific material surveillance program. These include: 1) improvements in the knowledge of the effects of radiation embrittlement in RPVs, 2) sharing of data within the BWR fleet, and 3) reductions in cost and radiation exposure by eliminating evaluation of material surveillance specimens that have no direct bearing upon the radiation behavior of plant-specific limiting materials.

The NRC safety evaluation for the BWRVIP ISP concluded the proposed BWRVIP ISP, if implemented in accordance with the conditions within the safety evaluation, is an acceptable alternative to existing BWR plant-specific RPV material surveillance programs for the purpose of maintaining compliance with the requirements of 10CFR50, Appendix H.

As conditions of the NRC safety evaluation, each licensee is required to provide information on how they will determine RPV and/or surveillance capsule fluences. The information must show that: 1) RPV and surveillance capsule fluences will be established based on the use of an NRC-approved fluence methodology, and 2) if one methodology is used to determine the neutron fluence values for the RPV and one or more different methodologies are used to establish the neutron fluence values for the ISP surveillance capsules which "represent" that RPV in the ISP, than the results of the differing methodologies are compatible. This information is provided in the following paragraphs.

With respect to the specific fluence methodology, PNPP has used the NRC-approved General Electric NEDC 32983P-A, "General Electric Methodology for Reactor Pressure Vessel Fast Neutron Flux Evaluations", to calculate the most recent fluence values. This calculation was performed to support a revision to the PNPP RPV pressure-temperature limit curves which was submitted to the NRC for review and approval by letter dated June 4, 2002 (PY-CEI/NRR-2627L). The PNPP USAR is being revised (Attachment 4) to reflect that an NRC-approved methodology will be used which conforms with Regulatory Guide 1.190, "Calculational and Dosimetry Methods for Determining Pressure Vessel Neutron Fluence." Use of an NRC-approved methodology satisfies the first condition contained within the NRC safety evaluation.

Regarding neutron fluence methodology compatibility, the NRC provided additional clarification following issuance of the February 1, 2002 Safety Evaluation. At the August 29, 2002 "Workshop on the BWRVIP RPV Integrated Surveillance Program", the NRC staff stated that methodology compatibility is satisfied if the surveillance capsules and the RPVs are evaluated with an NRC-approved methodology that complies with Regulatory Guide (RG) 1.190. The requirement to use an NRC-approved methodology that is

consistent with RG 1.190 is being included into the PNPP USAR (Attachment 4). This should ensure compatibility of the results of the neutron fluence values. Use of an NRC-approved methodology that is consistent with RG 1.190 satisfies the second condition contained within the NRC safety evaluation.

5.0 REGULATORY ANALYSIS

5.1 SIGNIFICANT HAZARDS CONSIDERATION

The Significant Hazards Consideration for the proposed USAR changes is contained in Attachment 3.

6.0 ENVIRONMENTAL CONSIDERATION

The proposed license amendment was evaluated against the criteria of 10CFR51.22 for environmental considerations. The proposed change does not significantly increase individual or cumulative occupational radiation exposures, does not significantly change the types or significantly increase the amounts of effluents that may be released off-site, and as discussed in Attachment 3, does not involve a significant hazards consideration. Based upon the preceding discussion it has been concluded that the proposed license amendment meets the criteria given in 10CFR51.22(c)(9) for categorical exclusion from the requirement for an Environmental Impact Statement.

SIGNIFICANT HAZARDS CONSIDERATION

The proposed license amendment is requesting Nuclear Regulatory Commission (NRC) review and approval of changes to the Perry Nuclear Power Plant (PNPP) Updated Safety Analysis Report (USAR) to reflect participation in the Boiling Water Reactor Vessel and Internals Project (BWRVIP) Integrated Surveillance Program (ISP).

The standards used to arrive at a determination that a request for amendment involves no significant hazards considerations are included in the NRC's Regulation, 10CFR50.92, which states that the operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any previously evaluated; or (3) involve a significant reduction in a margin of safety.

The proposed amendment has been reviewed with respect to these three factors and it has been determined that the proposed change does not involve a significant hazard because:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

   NRC regulations impose requirements upon the reactor coolant system to ensure that adequate safety margins against nonductile or rapidly propagating failures exist during normal operation, anticipated operational occurrences, and system hydrostatic tests. These requirements are set forth in 10CFR50, Appendix A, "General Design Criteria for Nuclear Power Plants", Criterion 31, "Fracture Prevention of Reactor Coolant Pressure Boundary"; Appendix G, "Fracture Toughness Requirements"; and Appendix H, "Reactor Vessel Material Surveillance Program Requirements." 10CFR50, Appendix H requires that changes in the fracture toughness properties of reactor vessel materials, resulting from the neutron irradiation and the thermal environment, are monitored by a material surveillance program. To determine the effects of neutron fluence on the nil-ductility reference temperature of reactor vessel materials, the methods provided in Regulatory Guide (RG) 1.99, "Radiation Embrittlement of Reactor Vessel Materials", Revision 2 are used.

   As described in the PNPP USAR, the current PNPP material surveillance program is a plant-specific program which complies with 10CFR50, Appendix H.

   The proposed amendment involves changing the material surveillance program from a plant-specific program to an integrated surveillance program. The use of an integrated program is consistent with the requirements of 10CFR50, Appendix H, Paragraph III.C. The integrated program proposed by PNPP is the Boiling Water Reactor Vessel Internals Program (BWRVIP) Integrated Surveillance Program (ISP). The BWRVIP ISP has been reviewed and approved by the NRC staff as an acceptable program and is in conformance with 10CFR50, Appendix H. Use of the ISP, among its many benefits, will increase the number of data points used in the evaluation of changes in vessel material properties. This will improve compliance

with the aforementioned NRC regulations. The methods contained in RG 1.99, Revision 2 will still be used to determine the effects of neutron fluence upon the nil-ductility reference temperature of the PNPP reactor vessel materials.

This change will not affect the reactor pressure vessel, as no physical changes are involved. The proposed change will not cause the reactor pressure vessel or interfacing systems to be operated outside of any design or testing limits. Furthermore, the proposed changes will not alter any assumptions previously made in evaluating the radiological consequences of any accident. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed change would not create the possibility of a new or different kind of accident from any previously evaluated.

   The proposed change revises the PNPP licensing bases to reflect participation in the BWRVIP ISP. The ISP was approved by the NRC staff as an acceptable material surveillance program which complies with 10CFR50, Appendix H. The proposed change will not impact the manner in which the plant is designed or operated. No new accident types or failure modes will be introduced as a result of the proposed change. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from that previously evaluated.

3. The proposed change will not involve a significant reduction in the margin of safety.

   The material surveillance program requirements contained in 10CFR50, Appendix H provide assurance that adequate margins of safety exist for the reactor coolant system against nonductile or rapidly propagating failures during normal operation, anticipated operational occurrences, and system hydrostatic tests. The BWRVIP ISP has been approved by the NRC staff as an acceptable material surveillance program which complies with 10CFR50, Appendix H. The ISP will provide the material surveillance data which will ensure that the safety margins required by NRC regulations are maintained for the PNPP reactor coolant system. Therefore, the proposed change does not involve a significant reduction in any margins of safety.

Based upon the reasoning presented above the requested change does not involve a significant hazards consideration.

TABLE 1.8-1 (Continued)

Regulatory Guide (Rev.;RRRC Category)	Degree of Conformance	USAR Section/ Reference
1.163 (Continued)	The containment isolation check valves in the Feedwater penetrations are tested per the Inservice Testing Program.	
8.1 - (Revision 0 - 2/73)		
Radiation symbol	PNPP conforms to this guide.	
1.190 - (REVISION 0 - 4/01)		
CALCULATIONAL AND DOSIMETRY METHODS FOR DETERMINING PRESSURE VESSEL NEUTRON FLUENCE	NEUTRON FLUENCE METHODOLOGIES USED BY PNPP WILL CONFORM TO THIS GUIDE.	4.1, 4.3, 5.3

Attachment 4
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5.3.1.6 Material Surveillance

5.3.1.6.1 Compliance with "Reactor Vessel Material Surveillance Program Requirements"

The materials surveillance program monitors changes in the fracture toughness properties of ferritic materials in the reactor vessel beltline region resulting from their exposure to neutron irradiation and thermal environment.

Reactor vessel materials surveillance specimens are provided in accordance with requirements of ASTM E-185-73 and 10 CFR 50, Appendix H. Materials for the program are selected to represent materials used in the reactor beltline region. Specimens are manufactured from a plate actually used in the beltline region and a weld typical of those in the beltline region and thus represent base metal, weld material, and the weld heat affected zone material. The plate and weld are heat treated in a manner which simulates the actual heat treatment performed on the core region shell plates of the completed vessel.

Each in-reactor surveillance capsule contains Charpy-V-Notch specimens with base metal, weld metal and heat affected zone material as shown in the following tables. A set of out-of-reactor baseline Charpy-V-Notch specimens and archive material are provided with the surveillance test specimens.

	Number of Charpy V-Notch Specimens		
Capsule Location	Base	Weld	HAZ
3°(1)	12	12	12
177°	12	12	12
183°	12	12	12
3° Reconstituted(2)	12	12	n/a

(1) Removed in RF05 at 5.5 EFPY (effective full power years)

(2) Installed in RF06

INFORMATION ONLY

Three capsules are provided in accordance with Case A requirements of 10 CFR 50 Appendix H since the predicted (at time of design) increase in reference temperature of the reactor vessel steel was less than 100°F at end of life.

INFORMATION ONLY

The proposed withdrawal schedule is in accordance with 10 CFR 50, Appendix H.

Capsule	EFPY**
First capsule*:	6
Second capsule:	15
Third capsule:	Standby
3° azimuth reconstituted capsule:	Standby

INSERT 1

* withdrawn 1/96 after 5.5 EFPY (3° azimuth)

** effective full-power years

Fracture toughness testing of irradiated capsule specimens will be in accordance with requirements of 10 CFR 50, Appendix H.

5.3.1.6.2 Neutron Flux and Fluence Calculations

A description of the analytical methods and resulting neutron fluence used to predict irradiation effects is contained in Sections 4.1.4.5 and 4.3.2.8. The peak fluence at 1/4 wall thickness (1/4 T) of the vessel beltline material after 32 EFPY of service is used for this purpose.

5.3.1.6.3 Predicted Irradiation Effects on Vessel Beltline Materials

INSERT 2

Estimated maximum changes in nil ductility temperature (RT_{NDT}) and upper shelf fracture energy at end of plant life are listed for selected reactor vessel materials in Table 5.3-3. Reference nil ductility temperatures were established in accordance with 10 CFR 50, Appendix G and NB-2330 of the ASME Code.

INSERT 1

The program for implementation of the scheduling, withdrawal, and testing of the material surveillance specimens is governed and controlled by the Boiling Water Reactor Vessel and Internals Project (BWRVIP) BWRVIP-78, "BWR Vessel and Internals Project, BWR Integrated Surveillance Program Plan" (Reference 7); BWRVIP-86, "BWR Vessel and Internals Project, BWR Integrated Surveillance Program Implementation Plan" (Reference 8); NRC letter dated December 15, 2000, "Request for Additional Information Regarding BWRVIP-78" (Reference 9); NRC letter dated May 30, 2001, "Project No. 704 – BWRVIP Response to Second NRC Request for Additional Information on the BWR Integrated Surveillance Program" (Reference 10); and the NRC Safety Evaluation (Reference 11) which approved BWRVIP-78 and BWRVIP-86. The BWRVIP Integrated Surveillance Program (ISP) complies with the requirements of 10 CFR 50, Appendix H.

The specimens will be pulled in accordance with the test matrix included in BWRVIP-86 as modified by the NRC's safety evaluation.

Capsule	ISP Capsule ID	Date
First Capsule	PY1 3°	Withdrawn 1/96 after 5.5 Effective Full-Power Years
Second Capsule	PY1 177°	2012
Third Capsule	PY1 183°	2026
Reconstituted Capsule	PY1 3°	Standby

INSERT 2

A neutron fluence calculation methodology which has been approved by the NRC staff and conforms with U.S. Nuclear Regulatory Commission Regulatory Guide 1.190, "Calculational and Dosimetry Methods for Determining Pressure Vessel Neutron Fluence", will be used for the determination of neutron fluence values for the PNPP.

conditions. Therefore, it is concluded that the vessel integrity will be maintained during the most severe postulated transients, since all such transients are evaluated in the design of the reactor vessel. The postulated transient for which the vessel has been designed is shown on Figure 5.2-3 and discussed in Section 5.2.2.

5.3.4 REFERENCES FOR SECTION 5.3

1. Cooke, F., "Transient Pressure Rises Affecting Fracture Toughness Requirements for BWR," NEDO-21778-A, dated December 1978.

2. Watanabe, H., "Boiling Water Reactor Feedwater Nozzle/Sparger, Final Report," (NEDE-21821-2 and NEDO-21821-2), dated August 1979.

3. Caine, T. A., "Implementation of Regulatory Guide 1.99, Revision 2 for Perry Nuclear Power Plant Unit 1," November 1989 (SASR 89-76/DRF 137-0100).

4. "Radiation Effects in Boiling Water Reactor Pressure Vessel Steels," (NEDO-21708), dated October 1977.

5. Tilly, L. J., "Perry Unit 1 RPV Surveillance Materials Testing and Analysis," November 1996 (GE-NE-B1301793-01, Revision 0)

6. American Society for Testing and Materials (ASTM) E 185-73, Standard Recommended Practice for Surveillance Tests for Nuclear Rector Vessels, 1973.

INSERT 3

INSERT 3

7. Boiling Water Reactor Vessel and Internals Project (BWRVIP) BWRVIP-78, "BWR Vessel and Internals Project, BWR Integrated Surveillance Program Plan", EPRI TR-114228, dated December 1999.

8. Boiling Water Reactor Vessel and Internals Project (BWRVIP) BWRVIP-86, "BWR Vessel and Internals Project, BWR Integrated Surveillance Program Implementation Plan", EPRI Technical Report 1000888, dated December 2000.

9. Letter to U.S. NRC Document Control Desk from Mr. C. Terry, dated December 15, 2000, subject: "Project No. 704 – BWRVIP Response to NRC Request for Additional Information Regarding BWRVIP-78."

10. Letter to U.S. NRC Document Control Desk from Mr. C. Terry, dated May 30, 2001, subject: "Project No. 704 – BWRVIP Response to Second NRC Request for Additional Information on the BWR Integrated Surveillance Program."

11. Letter to Mr. Carl Terry, BWRVIP Chairman, from Mr. William H. Bateman, Nuclear Regulatory Commission, dated February 1, 2002, subject: 'Safety Evaluation Regarding EPRI Proprietary Reports "BWR Vessel and Internals Project, BWR Integrated Surveillance Program Plan (BWRVIP-78)" and "BWRVIP-86: BWR Vessel and Internals Project, BWR Integrated Surveillance Program Implementation Plan."'.

Commitments

The following table identifies the actions that are considered to be regulatory commitments. Any other actions discussed in this document represent intended or planned actions, are described for the NRC's information, and are not regulatory commitments. Please notify the Manager - Regulatory Affairs at the Perry Nuclear Power Plant (PNPP) of any questions regarding this document or any associated regulatory commitments.

Commitments
1. The reactor pressure vessel material surveillance program, as described within the Perry Nuclear Power Plant Updated Safety Analysis Report, will be revised from a plant-specific program to the Boiling Water Reactor Vessel and Internals Project (BWRVIP) Integrated Surveillance Program (ISP).