

March 31, 2003

Mr. William R. Kanda
Vice President - Nuclear
FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant
P.O. Box 97, A200
10 Center Road
Perry, OH 44081

SUBJECT: PERRY NUCLEAR POWER PLANT - REQUEST FOR ADDITIONAL
INFORMATION (RAI) FOR RELIEF REQUEST FOR THE SECOND 10-YEAR
INTERVAL INSERVICE TESTING PROGRAM AT (TAC NO. MB7343)

Dear Mr. Kanda:

By letter dated June 24, 2002, FirstEnergy Nuclear Operating Company, requested relief from certain American Society of Mechanical Engineers inservice testing requirements for check valves at the Perry Nuclear Power Plant (PNPP). The relief request VR-12 proposes to extend the exercise interval for those check valves whose safety function is to limit the amount of air leakage from the emergency service water sluice gate inflatable seals, when the seals are inflated, in the event of a loss of supply air.

During the review, the Nuclear Regulatory Commission staff has identified that additional information is needed in order to complete the review. Specific questions are presented in the enclosed RAI.

The enclosed question has already been discussed with your staff. In order to accommodate PNPP's refueling outage, please respond to this RAI by April 14, 2003. If you have any questions concerning our review, or additional time is needed to respond to the RAI, please contact me at (301) 415-3154.

Sincerely,

/RA by J. Hopkins for/

Stephen P. Sands, Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-440

Enclosure: Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION

PERRY NUCLEAR POWER PLANT (PNPP)

RELIEF REQUEST FOR THE SECOND 10-YEAR INTERVAL

INSERVICE TESTING PROGRAM

The Nuclear Regulatory Commission staff has reviewed the June 24, 2002, FirstEnergy Nuclear Operating Company submittal regarding changes to the PNPP Relief Request VR-12 and has the following question and comment concerning the submittal:

1. The proposed extension of the exercise interval does not adequately explain why the proposed alternative provides an acceptable level of quality and safety. In addition, the submittal does not demonstrate that compliance with Code requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.
2. The proposed request is to test a check valve once in a period of time vice a minimum of two times as required by code without any additional confirmation or efforts to confirm the operational status of the valve. No supporting information is provided to show that a single test provides an adequate level of safety and quality as do the performance of multiple tests.
3. On page 2 of 2 of Attachment 1 to Perry Relief VR-12, the licensee references a Safety Evaluation that states "When the seals are inflated, seal integrity will be verified twice daily." Is this statement part of the proposed Alternative Testing? Is credit for check valve operation being taken by the verification that the seal has maintained pressure?

Perry Nuclear Power Plant, Unit 1

cc:

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