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August 28, 2006  
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United States Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

Perry Nuclear Power Plant  
Docket No. 50-440  
Report of Changes Pursuant to 10 CFR 50.46

Ladies and Gentlemen:

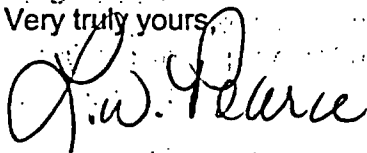
By letter dated July 28, 2006, the General Electric Company notified the FirstEnergy Nuclear Operating Company (FENOC) of a Loss Of Coolant Accident (LOCA) analysis methodology change. FENOC hereby reports this change for the Perry Nuclear Power Plant pursuant to 10 CFR 50.46(a)(3)(ii).

The nature of the change in methodology is the use of mid-peaked and top-peaked axial power shapes in the small break LOCA analyses. The effect of this change in methodology results in an additional 0° F change to the Peak Cladding Temperature (PCT). Adding the absolute value of this change in PCT to previously reported PCT errors/changes, the cumulative value of the errors/changes is greater than 50° F.

The PCT is 1565 ° F (with the cumulative errors/changes incorporated) and continues to satisfy the 10 CFR 50.46(b)(1) criteria of < 2200° F. Additionally, the maximum local oxidation is 1.0% and the metal-water reaction is .1 %, which are below the 10 CFR 50.46(b) acceptance criteria of 17% and 1.0%, respectively. Since the 10 CFR 50.46(b) criteria remain satisfied, a reanalysis is not required.

There are no regulatory commitments included in this letter or its attachments. If there are any questions or if additional information is required, please contact Mr. Gregory A. Dunn, Manager – Fleet Licensing, at (330) 315-7243.

Very truly yours,



cc: NRC Region III  
NRC Resident Inspector  
NRC Project Manager

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