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Subject: Perry Nuclear Power Plant
Notification of Deviation from BWRVIP-75-A guidance and Notification of
Commitment Change Related to Generic Letter 88-01 Inspection Frequency

Ladies and Gentlemen:

This letter is to provide notification to the NRC of a deviation from the Boiling Water Reactor Vessel and Internals Project (BWRVIP) guidelines for the Perry Nuclear Power Plant (Perry). This letter also serves as the notification of a revision to the commitments made to Generic Letter (GL) 88-01, "NRC Position on IGSCC In BWR Austenitic Stainless Steel Piping." This is a notification of a change only and no action from the NRC is being requested.

The deviation is from a "needed" element of the BWRVIP program. The needed element is performing inspections in accordance with the guidance of BWRVIP-75-A, "BWR Vessel and Internals Project Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules." BWRVIP-75-A, approved by the NRC (refer to NRC letter dated March 16, 2006, ADAMS Accession Number ML060750725), requires existing non-overlaid GL 88-01 Category E welds to be inspected every six (6) years following completion of two (2) qualified inservice examinations (refer to BWRVIP-75-A Table 3-1). The Category E weld inspection frequency is also tracked as part of Perry's commitments related to GL 88-01.

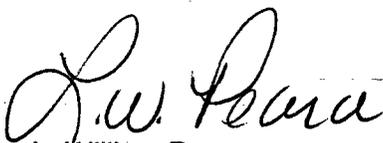
Feedwater weld 1B13-N4E-KB (weld N4E) is an existing non-overlaid Category E weld that was last inspected in May 1999 during Perry's seventh refuel outage. In order to comply with the 6 year inspection frequency specified within BWRVIP-75A and the committed GL 88-01 inspection schedule, the next inspection for weld N4E should have been performed in the tenth refuel outage in March 2005, but it was not. This missed inspection has been addressed in the Perry corrective action program. The inspection for weld N4E is now scheduled for the eleventh refuel outage, planned for the spring of 2007. Therefore, a deviation to the BWRVIP-75-A inspection frequency and a revision to prior commitments to the GL 88-01 inspection schedule are required.

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BWRVIP-75-A also requires 25% of GL 88-01 Category C welds, which are welds susceptible to Intergranular Stress Corrosion Cracking (IGSCC), to be inspected every ten (10) years following completion of two (2) qualified inservice examinations (See Table 3-1 of BWRVIP-75 A). Note that in accordance with Perry's Risk-Informed Inservice Inspection Program for Class 1 welds, 100% of the Category C welds are selected for examination. The Category C weld inspection frequency is also tracked as part of Perry's commitments to GL 88-01. Sixteen (16) of Perry's 25 Category C welds were last examined in April of 1996 during Perry's fifth refuel outage. In order to be within the 10 year inspection requirement, the next inspection should have been performed in the tenth refuel outage in March 2005, but was not. The missed examinations have also been addressed in the Perry corrective action program. The inspection of the 16 Category C welds are now scheduled for the eleventh refuel outage, planned for the spring of 2007. Therefore, a deviation to the BWRVIP-75-A inspection frequency and a revision to prior commitments to the GL 88-01 inspection schedule are required.

The deviations from the BWRVIP guidelines and GL 88-01 commitments have been documented, reviewed, and approved in accordance with PNPP procedures and NEI 99-04 guidance. The review provides assurance that the risk associated with the approximate two year extension to the examination frequency for the Category E weld (N4E-KB) and the approximate one year extension to the examination frequency for the Category C welds is negligible given the excellent performance history of stress improved flawed welds, the favorable chemistry regime that has been implemented at Perry, the continued compliance to ASME Code inspection requirements, and the risk determined using the Risk-Informed Inservice Inspection methodology. It is therefore concluded that extending the volumetric inspections for the associated welds beyond BWRVIP-75-A guidance and as specified in the committed GL 88-01 inspection schedule is acceptable.

If there are any questions or if additional information is required, please contact Mr. Gregory A. Dunn, Manager – FENOC Fleet Licensing, at (330) 315-7243.



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cc: NRC Project Manager
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