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10 CFR 50.90

United States Nuclear Regulatory Commission
Document Control Desk
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Subject: Perry Nuclear Power Plant
Application for a Technical Specification Improvement to Revise Technical Specification 3.1.8, "Scram Discharge Volume (SDV) Vent and Drain Valves," Using the Consolidated Line Item Improvement Process

In accordance with the provisions of 10 CFR 50.90, the FirstEnergy Nuclear Operating Company (FENOC) is submitting a request for an amendment to the Technical Specifications (TSs) for the Perry Nuclear Power Plant.

The proposed changes would revise the Required Action in TS 3.1.8, "Scram Discharge Volume (SDV) Vent and Drain Valves," for the condition of having one or more SDV vent or drain lines with one valve inoperable. These changes are based on Technical Specification Task Force (TSTF) change traveler TSTF-404 (Revision 0), which has been approved generically for the Boiling Water Reactor (BWR) BWR6 Standard Technical Specification NUREG-1434. The availability of this TS improvement was announced in the *Federal Register* on April 15, 2003, as part of the Consolidated Line Item Improvement Process (CLIIP).

Enclosure 1 provides a description of the proposed change and confirmation of applicability, the existing TS pages marked-up to show the proposed change, and the existing TS Bases pages marked-up to reflect the proposed change (for information only). There are no new regulatory commitments associated with this proposed change.

Approval of the license amendment is requested prior to December 30, 2007, with the amendment to be implemented within 90 days following its effective date.

In accordance with 10 CFR 50.91, a copy of this application, with enclosure, is being provided to the designated State of Ohio Official.

A001

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.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 29, 2006.

L.W. Pearce

Enclosure:

1. Perry Nuclear Power Plant Evaluation for a Proposed License Amendment to Revise Technical Specification 3.1.8, "Scram Discharge Volume (SDV) Vent and Drain Valves"

cc: NRC Project Manager
NRC Resident Inspector
NRC Region III
N. Dragani, Executive Director, Ohio Emergency Management Agency, State of Ohio (NRC Liaison)

PERRY NUCLEAR POWER PLANT
EVALUATION FOR A PROPOSED LICENSE AMENDMENT TO REVISE TECHNICAL SPECIFICATION 3.1.8, "SCRAM DISCHARGE VOLUME (SDV) VENT AND DRAIN VALVES"

1.0 DESCRIPTION OF PROPOSED AMENDMENT

2.0 ASSESSMENT

- 2.1 APPLICABILITY OF PUBLISHED SAFETY EVALUATION
- 2.2 OPTIONAL CHANGES AND VARIATIONS

3.0 REGULATORY ANALYSIS

- 3.1 NO SIGNIFICANT HAZARDS CONSIDERATION
- 3.2 VERIFICATION AND COMMITMENTS

4.0 ENVIRONMENTAL EVALUATION

5.0 PRECEDENT

6.0 REFERENCES

7.0 ATTACHMENTS

1. Proposed Operating License Change (Hand Mark-up)
2. Proposed Technical Specification Bases Changes (For Information Only)

1.0 DESCRIPTION OF PROPOSED AMENDMENT

The proposed license amendment would revise Required Action in Technical Specification 3.1.8, "Scram Discharge Volume (SDV) Vent and Drain Valves," for the condition of having one or more SDV vent or drain lines with one valve inoperable. These changes are based on Technical Specification Task Force (TSTF) change traveler TSTF-404 (Revision 0), which has been approved generically for the Boiling Water Reactor 6 Standard Technical Specifications, NUREG-1434. The availability of this Technical Specification improvement was announced in the *Federal Register* on April 15, 2003 (68 FR 18294) as part of the Consolidated Line Item Improvement Process (CLIIP). Refer to Attachment 1 for a mark-up of the existing TS reflecting the proposed changes.

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

FirstEnergy Nuclear Operating Company (FENOC) has reviewed the NRC safety evaluation published on April 15, 2003 (68 FR 18294) as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the information provided to support TSTF-404. FENOC has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to the Perry Nuclear Power Plant (PNPP) and justify this amendment for the incorporation of the changes into the PNPP Technical Specifications.

2.2 Optional Changes and Variations

FENOC is not proposing any variations or deviations from the Technical Specification changes described in TSTF-404 or the NRC staff's model safety evaluation published on April 15, 2003 (68 FR 18294).

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration

FENOC has reviewed the proposed no significant hazards consideration determination published on April 15, 2003 as part of the CLIIP. FENOC has concluded that the proposed determination presented in the notice is applicable to PNPP and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

There are no new regulatory commitments associated with this proposed change.

4.0 ENVIRONMENTAL EVALUATION

FENOC has reviewed the environmental evaluation included in the model safety evaluation published on April 15, 2003, as part of the CLIIP. FENOC has concluded that the NRC staff's

findings presented in that evaluation are applicable to PNPP and the evaluation is hereby incorporated by reference for this application.

5.0 PRECEDENT

This application is being made in accordance with the CLIIP. FENOC is not proposing variations or deviations from the Technical Specification changes described in the NRC staff's model safety evaluation published on April 15, 2003 (68 FR 18294).

Similar changes to Technical Specification SDV ACTIONS were approved by the NRC for the Pilgrim Nuclear Power Station (TAC NO. MC5422 – ADAMS Accession Number ML051870257) dated July 29, 2005; and for the Hope Creek Generating Station (TAC NO. MC6697 – ADAMS Accession Number ML060050304) dated January 13, 2006.

6.0 REFERENCES

1. *Federal Register*, "Notice of Availability of Model Application Concerning Technical Specifications Improvement Regarding Scram Discharge Volume Vent and Drain Valves Actions for Boiling Water Reactors Using the Consolidated Line Item Improvement Process," April 15, 2003 (68 FR 18294)

2. Technical Specifications Task Force (TSTF) Change Traveler 404, Revision 0

7.0 ATTACHMENTS

1. Proposed Operating License Change (Hand Mark-up)

2. Proposed Technical Specification Bases Changes (For Information Only)

PROPOSED OPERATING LICENSE CHANGE (HAND MARK-UP)

3.1 REACTIVITY CONTROL SYSTEMS

3.1.8 Scram Discharge Volume (SDV) Vent and Drain Valves

LCO 3.1.8 Each SDV vent and drain valve shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

---NOTE---
1. Separate Condition entry is allowed ~~for each~~ SDV vent and drain line.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more SDV vent or drain lines with one valve inoperable.	A.1 ~~Restore valve to OPERABLE status.~~ ISOLATE THE ASSOCIATED LINE.	7 days
B. One or more SDV vent or drain lines with both valves inoperable.	B.1 ~~NOTE~~ 2. An isolated line may be unisolated under administrative control to allow draining and venting of the SDV. Isolate the associated line.	8 hours
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3.	12 hours

PROPOSED TECHNICAL SPECIFICATION BASES CHANGES (FOR INFORMATION ONLY)

INFORMATION ONLY

BASES

APPLICABLE SAFETY ANALYSES (continued)

allow continuous drainage of the SDV during normal plant operation to ensure the SDV has sufficient capacity to contain the reactor coolant discharge during a full core scram. To automatically ensure this capacity, a reactor scram (LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation") is initiated if the SDV water level exceeds a specified setpoint. The setpoint is chosen such that all control rods are inserted before the SDV has insufficient volume to accept a full scram.

SDV vent and drain valves satisfy Criterion 3 of the NRC Policy Statement.

LCO

The OPERABILITY of all SDV vent and drain valves ensures that, during a scram, the SDV vent and drain valves will close to contain reactor water discharged to the SDV piping. Since the vent and drain lines are provided with two valves in series, the single failure of one valve in the open position will not impair the isolation function of the system. Additionally, the valves are required to be open to ensure that a path is available for the SDV piping to drain freely at other times.

APPLICABILITY

In MODES 1 and 2, scram may be required, and therefore, the SDV vent and drain valves must be OPERABLE. In MODES 3 and 4, control rods are not able to be withdrawn since the reactor mode switch is in the shutdown position and a control rod block is applied. Also, during MODE 5, only a single control rod can be withdrawn from a core cell containing fuel assemblies. Therefore, the SDV vent and drain valves are not required to be OPERABLE in these MODES since the reactor is subcritical and only one rod may be withdrawn and subject to scram.

ACTIONS

The ACTIONS table is modified by ~~a~~ Note 1. indicating that a separate Condition entry is allowed for each SDV vent and drain line. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable SDV line. Complying with the Required Actions may allow for continued operation, and subsequent inoperable SDV lines are governed by subsequent Condition entry and application of associated Required Actions.

INFORMATION ONLY

INSERT FROM NP 83-1-47

(continued)

The ACTIONS table is modified by a second Note stating that an isolated line may be unisolated under administrative control to allow draining and venting of the SDV.

INFORMATION ONLY

BASES

ACTIONS (continued)

A.1

associated line must be isolated to contain the reactor coolant during a scram.

When one SDV vent or drain valve is inoperable in one or more lines, the ~~valves must be restored to OPERABLE status within 7 days~~. The Completion Time is reasonable, given the level of redundancy in the lines and the low probability of a scram occurring during the time the valve(s) are inoperable. The SDV is still isolable since the redundant valve in the affected line is OPERABLE. Since the SDV is still isolable, the affected SDV line may be opened. This allows any accumulated water in the line to be drained, to preclude a reactor scram on SDV high level. During these periods, the single failure criterion may not be preserved, and a higher risk exists to allow reactor water out of the primary system during a scram.

7 day

and the line is not isolated.

B.1

If both valves in a line are inoperable, the line must be isolated to contain the reactor coolant during a scram. When a line is isolated, the potential for an inadvertent scram due to high SDV level is increased. ~~Required Action B.1 is modified by a Note that allows periodic draining of the SDV when a line is isolated.~~ During these periods, the line may be unisolated under administrative control. This allows any accumulated water in the SDV to be drained, to preclude a reactor scram on SDV high level. This is acceptable, since the administrative controls ensure the line can be isolated quickly, by a dedicated operator, if a scram occurs with the line not isolated.

MOVE TO PAGE B3.1-46

The 8 hour Completion Time to isolate the line is based on the low probability of a scram occurring while the line is not isolated and unlikelihood of significant CRD seal leakage.

C.1

If any Required Action and associated Completion Time is not met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be

(continued)

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