

February 9, 2007

Mr. L. W. Pearce  
Site Vice President  
FirstEnergy Nuclear Operating Company  
Perry Nuclear Power Plant  
Mail Stop A-PY-A290  
P.O. Box 97, 10 Center Road  
Perry, OH 44081-0097

SUBJECT: PERRY NUCLEAR POWER PLANT, UNIT 1 - REQUEST FOR ADDITIONAL INFORMATION RELATED TO REVISING MODE 4 RESIDUAL HEAT REMOVAL SHUTDOWN COOLING REQUIREMENTS TO ADD A DEFAULT CONDITION ADDRESSING SITUATIONS WHEN CONDITION "A" CANNOT BE MET WITHIN ITS COMPLETION TIME (TAC NO. MD2140)

Dear Mr. Pearce:

By letter to the Nuclear Regulatory Commission (NRC) dated June 1, 2006, FirstEnergy Nuclear Operating Company submitted a request to revise MODE 4 residual heat removal shutdown cooling requirements to add a default condition addressing situations when Condition A cannot be met within its completion time, for the Perry Nuclear Power Plant, Unit 1.

The NRC staff is reviewing your submittal and has determined that additional information is required to complete the review. The specific information requested is addressed in the enclosure to this letter. During a discussion with your staff on January 25, 2007, it was agreed that you would provide a response within 30 days from the date of this letter.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1486.

Sincerely,

*/RA/*

Thomas J. Wengert, Project Manager  
Plant Licensing Branch III-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-440  
Enclosure:  
Request for Additional Information

cc w/encl: See next page

Mr. L. W. Pearce  
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Perry Nuclear Power Plant, Unit 1

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Perry Nuclear Power Plant, Unit 1

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REQUEST FOR ADDITIONAL INFORMATION

PERRY NUCLEAR POWER PLANT, UNIT 1

DOCKET NO. 50-440

In reviewing the FirstEnergy Nuclear Operating Company's (FENOC's) submittal dated June 1, 2006, related to a request to revise MODE 4 residual heat removal shutdown cooling requirements to add a default condition addressing situations when Condition A cannot be met within its completion time, for the Perry Nuclear Power Plant, Unit 1 (Perry), the NRC staff has determined that the following information is needed in order to complete its review:

1. Discuss how Perry could comply with the proposed Technical Specifications (TSs) while simultaneously in Condition A and proposed Condition B of TS 3.4.10, if there was no means available to work towards the establishment of an alternate method of decay heat removal.

Background: If proposed Condition B of TS 3.4.10, "RHR [Residual Heat Removal] Shutdown Cooling System - Cold Shutdown" is entered, Required Actions of Condition A must still be carried out in accordance with TS 1.3, "Completion Times." TS 1.3 states a required actions condition remains in effect and the required actions apply until the condition no longer exists or the unit is not within the limiting condition for operation (LCO) applicability. Example 1.3-2 in TS 1.3 provides a discussion on simultaneously being in two conditions, A and B, as a result of the completion time for Condition A not being met, and therefore entering Condition B.

TS 3.4.10 Condition A, Required Action A.1 states: "Verify an alternate method of decay heat removal is available for each inoperable RHR shutdown cooling subsystem" (a separate condition entry is allowed for each RHR shutdown cooling subsystem). Page 3 of the license amendment request (LAR) states: "In parallel with this LAR for TS 3.4.10, the Perry performance improvement initiative is tracking a plant design change to incorporate a new alternate decay heat removal method for Mode 4. The new method will be capable of maintaining Cold Shutdown Mode 4 conditions early in a forced outage (24 hours or more after attaining Hot Shutdown Mode 3)." Prior to making this "new alternate decay heat removal method" available, TS compliance issues could still occur. This is the result of not being able to take any required actions for Condition A because there is no means to establish an alternate method of decay heat removal for each inoperable subsystem. Per TS 1.3, Required Actions of Condition A must be worked on, even if Required Actions of proposed Condition B are completed.

Enclosure