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PY-CEI/NRR-3042LATTN: Document Control Desk
United States Nuclear Regulatory Commission
Washington, D.C. 20555Subject: 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:

In a letter dated July 31, 1989 (PY-CEI/NRR-1044L), the Perry Nuclear Power Plant (PNPP) staff responded to a U.S. Nuclear Regulatory Commission (NRC) Request for Additional Information (RAI) related to the PNPP response to Generic Letter (GL) 88-01, "NRC Position on IGSCC In BWR Austenitic Stainless Steel Piping." In the July 31 letter, the PNPP staff outlined its positions and plans on meeting the thirteen NRC Staff positions outlined in GL 88-01. Attached to the letter was the PNPP inspection schedule for piping susceptible to Intergranular Stress Corrosion Cracking (IGSCC). The inspection schedule is tracked as a part of the PNPP commitments to GL 88-01.

The FirstEnergy Nuclear Operating Company is committed to the Boiling Water Reactor Vessel and Internals Project (BWRVIP) project for the Perry Nuclear Power Plant (PNPP). In a letter dated May 30, 1997, the BWRVIP reaffirmed the BWR Utility commitments to the NRC and agreed that timely notification will be provided to the NRC staff of a decision by a participating utility to not fully implement applicable BWRVIP guidance.

BWRVIP-75-A, "BWR Vessel and Internals Project Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules" requires 25% of GL 88-01 Category C welds, which are welds susceptible to IGSCC, to be inspected every ten (10) years following completion of two (2) qualified inservice examinations. Sixteen (16) of the 25 PNPP Category C welds were last examined in April of 1996 during the 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 were addressed in the PNPP corrective action program and notification of this deviation to BWRVIP guidelines and revision to GL 88-01 inspection schedule commitments was provided in a December 4, 2006 letter to the NRC (PY-CEI/NRR-2998L). The inspections of the 16 Category C welds were scheduled for Refuel Outage 11 (RFO 11).

Fifteen (15) of the 16 Category C welds were examined in RFO11 with acceptable results, but due to the inability to perform a chemical decontamination of the Reactor Recirculation system and the significant dose that would be required to remove interferences and access

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the 1B13-N1B-KB (N1B) weld, a decision was made to extend the frequency of this one Category C weld from 10 years to 13 years. The N1B weld is a nozzle to safe-end weld located on a Reactor Recirculation outlet nozzle and is the most difficult of all the Category C welds to access and would require as much as 15 REM of dose to examine. The frequency extension of the N1B weld is consistent with the PNPP ongoing program to keep personnel dose As Low As Reasonably Achievable (ALARA). A chemical decontamination of the Reactor Recirculation system piping is planned for RFO 12.

American Society of Mechanical Engineers (ASME) Section XI, Table IWB-2500-1, Examination Category B-F, contains the inspection requirements for Class 1 dissimilar metal piping welds. These requirements consist of surface and/or volumetric examination of 100% of the welds over a ten-year inspection interval. Because the second inspection interval for the PNPP ends in May 2009, completion of the N1B weld examination in RFO 12 will fulfill the ASME inspection requirements for this Class 1 weld.

In accordance with the guidance provided in BWRVIP-94, Revision 1, "BWR Vessel and Internals Project Program Implementation Guide" and NEI 99-04, "Guidelines for Managing NRC Commitment Change," notification is hereby being provided of a deviation from a "needed" element of the BWRVIP program and a revision of the commitments made to Generic Letter (GL) 88-01. This is a notification only and no action from the NRC is being requested.

The deviations from the BWRVIP guidelines and revision to 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 three year extension to the re-examination frequency for only one of PNPP's 25 Category C welds is negligible given the excellent performance history of non-flawed welds stress improved with Mechanical Stress Improvement Process (MISP), the favorable chemistry regime that has been implemented at the PNPP since the eighth operating cycle, the continued compliance with ASME Code inspection requirements, and the acceptable results for 15 RFO 11 Category C weld examinations, which included the similar weld on the "A" loop (1B13-N1A-KB).

If there are any questions or if additional information is required, please contact Mr. Henry L. Hegrat, FENOC Fleet Licensing Supervisor, at (330) 374-3114.



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