UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 20, 2009

Mr. Mark B. Bezilla
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 NO. 1 - REQUEST FOR ADDITIONAL INFORMATION RELATED TO INSERVICE TESTING PROGRAM REQUESTS IN SUPPORT OF THE THIRD TEN-YEAR INTERVAL (TAC NOS. ME0191, ME0195, ME0196, ME0197, AND ME0198)

Dear Mr. Bezilla:

By letter to the Nuclear Regulatory Commission (NRC) dated November 18, 2008 (Agencywide Documents Access and Management System Accession No. ML083370198), FirstEnergy Nuclear Operating Company submitted a relief request for eight separate proposed alternatives to certain requirements associated with the inservice testing program for the Perry Nuclear Power Plant, Unit No. 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 February 13, 2009, it was agreed that you would provide a response to the attached requests for additional information by May 15, 2009.

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) 415-1020.

Sincerely,

Sean C. Meighan, 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: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

PERRY NUCLEAR POWER PLANT, UNIT NO. 1

DOCKET NO. 50-440

In reviewing the FirstEnergy Nuclear Operating Company's (FENOC) submittal dated November 18, 2008 (Agencywide Documents Access and Management System Accession No. ML083370198), in which FENOC submitted a relief request (RR) for eight separate proposed alternatives to certain requirements associated with the in service testing program for the Perry Nuclear Power Plant, Unit No. 1 (PNPP), the Nuclear Regulatory Commission (NRC) staff has determined that the following information is needed in order to complete its review:

Request for Additional Information (RAI)

1. RR PR-1

PR-1-1
What are the rated flows and discharge pressures for the waterleg pumps?

PR-1-2
Are there annunciator alarms in the control room that alarm if the pump discharge header pressure drops below a preset value? If so, at what percentage of the pumps' differential pressure do they alarm?

PR-1-3
Is there a technical specification surveillance requirement to periodically verify that the headers are filled with water by venting the piping at high point vents?

PR-1-4
Are the waterleg pumps currently being monitored in a vibration monitoring program? What are the reference values of vibration velocity for these pumps?

2. RR VR-3

VR-3-1
Licensee reason for request states "Code Case OMN-1 has been determined by the NRC to provide an acceptable level of quality and safety when implemented in conjunction with the conditions imposed in RG [Regulatory Guide] 1.192. Since the NRC staff recommends licensees implement ASME Code [American Society of Mechanical Engineers Boiler and Pressure Vessel Code] Case OMN-1, PNPP proposed to implement Code Case OMN-1, Revision 1 in lieu of the stroke-time provisions specified in ISTC-5120 for MOVs [motor-operated valves] as well as the position verification testing in ISTC-3700."

The NRC staff review of ASME OM Code cases noted that OMN-1 was first published with the 1995 Edition of the Code. Minor changes were made when it was re-published with the 2002 Addenda. OMN-1 was later revised in its entirety in the 2006 Addenda publication.

However, the title of OMN-1 in any of the code case publication years has no reference to current revision number status. Does PNPP's request to apply Code Case OMN-1 Revision 1 refer to the version of OMN-1 published with the 2001 Edition through 2003 Addenda, or the major revision of OMN-1 published with the 2006 Addenda?

3. RR VR-4

VR-4-1
PNPP RR VR-4 proposes to use a performance-based testing program for various valves. The performance-based testing program is patterned on an approved methodology that was developed for containment leak rate testing. Title 10 of the *Code of Federal Regulation* (10 CFR), Part 50 Appendix J details the testing requirements for primary reactor containment leakage testing for water-cooled power reactors. There are two options in Appendix J for meeting the containment leakage test requirements. Option A is a prescriptive requirement and Option B is a performance-based requirement. RG 1.163 "Performance-Based Containment Leak-Test Program," approved the use of the Option B method. Are the valves listed in VR-4 considered to be applicable to 10 CFR Part 50 Appendix J? If not, please explain why the Appendix J, Option B methodology and the supporting analysis for containment system leakage testing requirements would also apply to valves that are not considered part of the Appendix J scope.

4. RR VR-5

VR-5-1
The RR proposes timing the slowest valve in a group to demonstrate functionality of all valves in the group. If the slowest valve exceeds the maximum stroke time of two seconds, then the valves will be re-timed to ensure the failure is properly attributed to the correct valve. ISTC-5153(b) requires that "Valves with measured stroke times that do not meet the acceptance criteria of ISTC-5152 shall be immediately retested or declared inoperable...If the second set of data meets the acceptance criteria, the cause of the initial deviation shall be analyzed and the results documented in the record of tests." Please describe plans for positively identifying which individual valve or valves exceeded the limiting stroke time during the original test, so the cause of the initial deviation can be determined as required.

5. RR VR-6

VR-6-1
The ASME Code has developed a Code Case addressing test frequencies of ASME Class 1 pressure safety/relief valves (SRV). The Code Case provides a 72 month test interval with a 6 month grace period to accommodate extended shutdown periods provided certain requirements are implemented. One of the requirements is that each valve is disassembled and inspected after as-found set pressure testing to verify that parts are free of defects resulting from time related degradation or service induced wear. Based on this inspection, the owner shall determine the need for additional inspections or testing to address any generic concerns. Please discuss the feasibility of implementing the criteria established by the ASME OM Code for extending the SRV test interval beyond 5 years.

VR-6-2
The RR states that four as-found setpoint tests exceeded the ASME Code tolerance of plus or minus 3 percent. Please provide the as-found setpoint data for the four failed tests, identify the cause of the failure if known, and identify any corrective actions taken to improve valve performance following the failed tests.

VR-6-3
Please provide a summary of the SRV testing conducted for the last 5 refueling outages (valve, date tested, as-found setpoint, interval since previous test).

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/RA/
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ADAMS Accession No. ML090650529 NRR-088

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