



FirstEnergy Nuclear Operating Company

Perry Nuclear Power Station
10 Center Road
Perry, Ohio 44081

Mark B. Bezilla
Vice President

440-280-5382
Fax: 440-280-8029

March 31, 2009
L-09-084

10 CFR 50.48

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject:

Perry Nuclear Power Plant Unit No. 1

Docket No. 50-440, License No. NPF-58

Clarification of Intention to Adopt NFPA 805, Performance Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition

By letter dated December 22, 2005 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML0600402590) FirstEnergy Nuclear Operating Company (FENOC) indicated the intent to adopt National Fire Protection Association Standard 805, "Performance - Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition" (NFPA 805), in accordance with 10 CFR 50.48(c), at the Perry Nuclear Power Plant (PNPP), following implementation at the Beaver Valley Power Station Units 1 and 2 (BVPS) and the Davis-Besse Nuclear Power Station Unit 1 (DBNPS). By letter dated May 11, 2006 (ADAMS Accession No. ML060970062), the NRC staff confirmed its understanding that all four of the above listed plants intend to submit license amendment requests to make the transition to NFPA 805 starting in 2010.

The transition to NFPA 805 is being implemented as a fleet initiative, and the current schedules for transition activities at BVPS and DBNPS have been provided to the NRC. In order to properly align NRC resources for the upcoming NFPA 805 license amendment applications, the NRC requested confirmation of FENOC's intentions for transition activities at PNPP by letter dated February 13, 2009.

FENOC remains committed to consistency among its fleet fire protection programs, and intends to complete NFPA-805 transition activities at PNPP. Active PNPP transition activities will begin upon approval of the license amendments for the other FENOC plants, with submittal of the associated license amendment application approximately two years later. In the interim, a robust design and effective Appendix R Fire Protection Program allows FENOC to continue to maintain fire safety at PNPP in accordance with the Facility Operating License.

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There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Thomas A. Lentz, Manager – Fleet Licensing, at (330) 761-6071.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark B. Bezilla". The signature is written in a cursive style with a large, stylized initial "M".

Mark B. Bezilla

cc: NRC Region III Administrator
NRC Resident Inspector
NRR Project Manager