



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

March 23, 2010

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 – REQUEST FOR ADDITIONAL  
INFORMATION REGARDING PROPOSED TECHNICAL SPECIFICATION  
CHANGE TO DIVISION 3 EMERGENCY DIESEL GENERATOR START TIME  
SURVEILLANCE REQUIREMENTS (TAC NO. ME1691)

Dear Mr. Bezilla:

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated June 30, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML091900387), FirstEnergy Nuclear Operating Company (FENOC or the licensee), requested an amendment to the Perry Nuclear Power Plant Unit No. 1 regarding the Technical Specification change to Division 3 Emergency Diesel Generator start time Surveillance Requirements.

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 March 9, 2010, it was agreed that you would provide a response within 60 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) 415-3302.

Sincerely,

*Araceli T. Billoch Colón*

Araceli T. Billoch Colón, Project Engineer  
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

AMENDMENT TO EMERGENCY DIESEL GENERATOR TECHNICAL SPECIFICATION

SURVEILLANCE REQUIREMENTS

PERRY NUCLEAR POWER PLANT

DOCKET NO. 50-440

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated June 30, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML091900387), the FirstEnergy Nuclear Operating Company, (the licensee) requested an amendment to the Perry Nuclear Power Plant. In the license amendment request (LAR), the licensee proposed modifying Technical Specification (TS) 3.8.1, "AC Sources - Operating." The proposed amendment will modify a Surveillance Requirement (SR) regarding the start time tests for the Division 3 Emergency Generator (EDG) to provide consistency with existing similar TS SRs related to EDG testing.

Specifically, the amendment will make the Division 3 frequency start time requirement consistent with the existing 13-second voltage requirement in the same SR, and with the existing 13-second start time requirements in SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.15, SR 3.8.1.19, and SR 3.8.1.20.

The NRC staff requests the following additional information to complete its review of the proposed amendment.

In the LAR, the licensee states that the accident analysis (SAFER/GESTR) assumes that design flow from the high-pressure core spray (HPCS) system is available 29 seconds after initiation of a Loss-of-Coolant Accident signal. The EDG start time and HPCS isolation valve stroke time are portions of the overall 29-second time. The analysis does not credit flow during partial opening of associated HPCS valve. According to the Updated Safety Analysis Report Table 6.2-22, the containment isolation motor operated valve E22F004 has a 'CLOSE' stroke time of 16 seconds. Assuming that the valve 'OPEN' stroke time is also 16 seconds (nominal voltage and frequency), that leaves 13 seconds for the HPCS EDG to attain the required voltage and frequency. In the LAR, the licensee is requesting that the HPCS EDG voltage and frequency (after 13 seconds) to be "at or above" 3900 Volts (V) and 58.8 Hertz (Hz). At this voltage and frequency, the stroke time may be longer than 16 seconds, resulting in less time available for the EDG to start.

Provide:

1. A summary of the analysis for the valve stroke time to open when the HPCS EDG voltage and frequency attain the minimum acceptable values.
2. A summary of the analysis for time required for full design flow into the reactor vessel, after initiation of an accident signal, with the HPCS valve partially open and the HPCS EDG at minimum allowable voltage and frequency.

Enclosure

3. Supporting documentation that shows how the HPCS valve stroke time has been validated.
4. Details on any plant procedures that allow operation of the HPCS EDG as a compensatory power source for other safety-related equipment during unavailability of Division 1 or Division 2 EDGs.

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Sincerely,

/RA/

Araceli T. Billoch Colon, Project Engineer  
Plant Licensing Branch III-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

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ADAMS Accession No.: ML100740652

NRR-088

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