

December 20, 2016
L-16-348

10 CFR 50.90

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

SUBJECT:

Perry Nuclear Power Plant
Docket No. 50-440, License No. NPF-58
Response to a Request for Additional Information Regarding a License Amendment Request for Upper Containment Pool (UCP) Gate Installation in MODEs 1, 2, and 3, and Drain-Down of the Reactor Cavity Portion of the UCP in MODE 3 (CAC No. MF7476)

By letter dated March 15, 2016 (Accession No. ML16075A411), FirstEnergy Nuclear Operating Company (FENOC) submitted to the Nuclear Regulatory Commission (NRC) a license amendment request for the Perry Nuclear Power Plant (PNPP). The proposed amendment would modify Technical Specification (TS) 3.6.2.2, "Suppression Pool Water Level," and TS 3.6.2.4, "Suppression Pool Makeup (SPMU) System," to allow installation of the reactor well to steam dryer storage pool gate in MODEs 1, 2, and 3. The proposed amendment would also create a new Special Operations TS, TS 3.10.9, "Suppression Pool Makeup - MODE 3 Upper Containment Pool Drain-Down," to allow draining of the reactor well portion of the upper containment pool in MODE 3.

On November 7, 2016, FENOC submitted a response to an NRC request for additional information (Accession No. ML16312A359).

On November 22, 2016, a teleconference was conducted between the NRC and FENOC staffs to discuss additional information the NRC requires to complete its review. By letter dated November 23, 2016 (Accession No. ML16327A018), the NRC issued the request for additional information. FENOC's response to this request is attached.

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There are no regulatory commitments contained in this submittal. If there are any questions or if additional information is required, please contact Mr. Thomas A. Lentz, Manager - Fleet Licensing, at (330) 315-6810.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 20, 2016.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Hamilton', with a large, stylized flourish at the end.

David B. Hamilton

Attachment:
Response to Request for Additional Information

cc: NRC Region III Administrator
NRC Resident Inspector
NRC Project Manager
Executive Director, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
Utility Radiological Safety Board

Response to Request for Additional Information
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By letter dated March 15, 2016, FirstEnergy Nuclear Operating Company (FENOC) submitted a license amendment request for Nuclear Regulatory Commission (NRC) review and approval. By letter dated November 23, 2016, NRC staff requested additional information to complete its review. The requested information is presented in bold type, followed by the FENOC response.

1. Describe any new or changed operator actions that are required as a result of the proposed installation of the reactor well to steam dryer storage pool gate in the upper containment pool in MODES 1, 2, and 3.

Response:

No new or changed operator actions are required as a result of the proposed installation of the reactor well to steam dryer storage pool gate in the upper containment pool in MODES 1, 2, and 3. Applicable procedures that will be used to perform the proposed activity will not be finalized until the implementation period following issuance of the license amendment by the NRC. The procedures will be approved and made effective, concurrent with the implementation date of the license amendment.

2. Describe any new or changed operator actions as a result of the proposed creation of the new Special Operations TS [Technical Specification], TS 3.10.9, "Suppression Pool Makeup – MODE 3 Upper Containment Pool Drain-Down."

Response:

No new or changed operator actions are required as a result of proposed TS 3.10.9, "Suppression Pool Makeup – MODE 3 Upper Containment Pool Drain-Down." Applicable procedures that will be used to perform the proposed activity will not be finalized until the implementation period following issuance of the license amendment by the NRC. The procedures will be approved and made effective, concurrent with the implementation date of the license amendment.

Additionally, during the November 22, 2016 teleconference, NRC staff requested a clarification on the use of the proposed Technical Specification Figure 3.10.9-1, "Upper Containment and Suppression Pool Levels." The figure depicts the upper containment pool and the suppression pool water levels operators are required to satisfy during the drain-down period. Water transfer will be performed in a one for one volume ratio similar to the operation of the suppression pool makeup system.

- 3. Section 3.2.1, “Reactor Well Gate Installation (MODES 1, 2, and 3),” and Section 3.2.2, “Reactor Well Drained in MODE 3,” of the enclosure to the license amendment request provides a brief discussion on current emergency operating procedures (EOPs). Describe any changes to manual operator actions covered by EOPs or abnormal procedures that may occur as a result of this amendment. If so, describe any evaluation of the EOPs for potential modifications.**

Response:

No changes to the EOPs or the off-normal (abnormal) instructions are required as a result of this license amendment request.

- 4. State if the operators will be trained on the proposed license amendment prior to the end of the implementation period.**

Response:

Operations personnel will be trained to the TS changes and applicable plant integrated operating procedures prior to the upcoming refueling outage, which is currently scheduled to start on March 5, 2017.

- 5. Based on FENOC’s response to the above requests 1 and 2, describe the verification and validation activities associated with any required changes.**

Response:

As stated in the responses to Items 1 and 2 above, no new or changed operator actions are required as a result of the proposed license amendment request. As such, no verification and validation activities are planned.

- 6. Section 3.2.1 of the enclosure to the license amendment request states that the suppression pool water level can be managed by plant operations during the short duration that the condition will exist. Explain how long the “short duration” will last.**

Response:

The reactor well to steam dryer storage pool gate will be installed during MODE 1 on the last day of normal operation prior to the start of a refueling outage. As such, the “short duration” period cited in the license amendment request is expected to be less than 24 hours.