



FirstEnergy Nuclear Operating Company

Perry Nuclear Power Plant
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L-17-068

10CFR50.4, 10CFR50.54(q), 10CFR72.44(f)

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555-0001

Perry Nuclear Power Plant
Docket No. 50-440, License No. NPF-58
EMERGENCY PLAN FOR PERRY NUCLEAR POWER PLANT DOCKET No's. 50-440

Pursuant to 10CFR50.4, enclosed is a summary of changes for Rev. 50 to the Emergency Plan for the Perry Nuclear Power Plant (PNPP).

The changes have been reviewed in accordance with 10CFR50.54 (q), and it has been determined that the changes do not result in a reduction of the effectiveness of the Emergency Plan. It has also been determined that the Plan, as changed, continues to meet the standards of 10CFR50.47 (b) and 10CFR50 Appendix E.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Rick O'Connor, Manager, Emergency Response Section, at (440) 280-5693.

Sincerely,

David Hamilton

Enclosure:
Summary of Changes

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cc: United States Regulatory Commission

United States Nuclear Regulatory Commission Document Control Desk

U.S. Nuclear Regulatory Commission NRC Project Manager

United States Environmental Protection Agency, Mr. Steve Ostrodka, Chief

Division of Spent Fuel Storage and Transportation Office of Nuclear Material Safety
and Safeguards NRC Regional Response Center

Regional Administrator United States Nuclear Regulatory Commission, Region III -
Incident Response Center

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Summary of Changes

ENCLOSURE

Perry Nuclear Power Plant EP 0000 Revision 50 Change Summary

Revision 50 of EP 0000, Emergency Plan for Perry Nuclear Power Plant Docket Nos. 50-440 contained the following changes.

Several changes were made to the Emergency Plan to implement NEI 99-01 Revision 6 Emergency Action Levels as authorized by the Commission in License Amendment 173 to Operating License NPF-58 for the Perry Nuclear Power Plant Unit 1 in Letter dated September 14, 2016. These changes were evaluated in 10CFR50.54(q) PY-2016-017-00 and incorporated due to prior Commission approval.

1. All references to the NUMARC/NESP-007 emergency action level scheme were removed. These included Initiating Conditions, Entry Criterion, Cross-Reference Matrix.

The NEI 99-01 Revision 6 scheme for Initiating Conditions, Emergency Action Level, and Cross-Reference are contained in the bases implementing procedure PSI-0019, EAL and EAL Bases Document. Each category, subcategory and applicable plant condition were incorporated into the Emergency Plan.

2. The PSI-0019, EAL and EAL Bases Document and EPI-A1, Emergency Action Levels were incorporated by reference in the Emergency Plan. EPI-A1 implements the EAL Classification Matrix.
3. Minor editorial changes to the definitions of Unusual Event, Alert, Site Area Emergency and General Emergency were made to match the definitions in the bases procedure (PSI-0019).

Some additional changes were incorporated into Revision 50 that were evaluated in 10CFR50.54(q) PY-2017-004-00 and found to be consistent with 10CFR50.47(b) and 10CFR50, Appendix E requirements and did not cause a reduction in effectiveness of the Emergency Plan These additional changes include:

1. Changed Severe Accident Guidelines (SAGs) to Severe Accident Management Guidelines (SAMGs) throughout the Emergency Plan to align with updated site procedures and current industry standards. This change was determined to be editorial in nature and therefore does not result in a decrease in effectiveness of the Emergency Plan.
2. Added Table 8-2 to describe topical training requirements for key on-site Emergency Response Organization (ERO) personnel. The table format used aligns more consistently with Table 8-1, which describes training requirements for off-site responders, and with the requirements of NUREG-0654, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants. The addition of this table does not change any existing training requirements, but rather packages them in a table format which provides more content detail and anchors them administratively in the Emergency Plan.