

David B. Hamilton
Vice President

440-280-5382

July 24, 2018
L-18-174

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 Request for Additional Information Regarding a Request to Revise the Technical Specifications to Adopt TSTF-542 "Reactor Pressure Vessel Water Inventory Control" (EPID L-2017-LLA-0405)

By correspondence dated December 6, 2017 (Accession No. ML17347A788), FirstEnergy Nuclear Operating Company (FENOC) submitted a request to adopt Technical Specifications Task Force (TSTF) traveler TSTF-542, "Reactor Pressure Vessel Water Inventory Control," Revision 2, for the Perry Nuclear Power Plant.

By electronic mail dated June 28, 2018, the Nuclear Regulatory Commission (NRC) requested additional information to complete its review. FENOC's response to this request is provided in Attachment 1.

A revised Technical Specification (TS) page is provided in Attachment 2. This revised page corrects an editorial error in proposed TS 3.3.5.2. As proposed, ACTIONS CONDITION F states "Required Action and associated Completion Times of Condition C, D, E, or F not met." The revised page removed the reference to CONDITION F and now states "Required Action and associated Completion Times of Condition C, D, or E not met." This page supersedes the page submitted by FENOC on December 6, 2017.

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 – Nuclear Licensing & Regulatory Affairs, at (330) 315-6810.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 24, 2018.

Sincerely,

A handwritten signature in black ink that reads "Frank R. Payne". The signature is written in a cursive style with a large initial "F".

David B. Hamilton

Attachment 1: Response to June 28, 2018 Request for Additional Information
Attachment 2: Revised Markup of Technical Specification Page 3.3-43b

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

Response to June 28, 2018 Request for Additional Information
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By correspondence dated December 6, 2017, FirstEnergy Nuclear Operating Company (FENOC) submitted a license amendment request for Nuclear Regulatory Commission (NRC) review and approval. By electronic mail dated June 28, 2018, NRC staff requested additional information to complete its review. The requested information is presented below in bold type, followed by the FENOC response.

RAI 1:

In Attachment 2 of the amendment request, on pages 3.3-43d and 3.3-43e, proposed PNPP [Perry Nuclear Power Plant] TS [Technical Specifications] Table 3.3.5.2-1, “RPV Water Inventory Control Instrumentation,” contains values for some functions that are not consistent with the TSTF [Technical Specifications Task Force]-542 Standard TS (STS) values for the Required Channels per Function column. The table below compares PNPP’s proposed RPVWIC [Reactor Pressure Vessel Water Inventory Control] required channels per function with the corresponding entry in TSTF-542. The NRC staff reviewed the variations section of the LAR [License Amendment Request]; however, there was not a sufficient description of the variations from the STS format. The staff also reviewed Chapter 6 of the PNPP Updated Safety Analysis Report (ADAMS Accession No. ML17305A201) to determine why the selected Required Channels per Function were retained.

For the proposed PNPP TS Table 3.3.5.2-1 Functions identified in the table below, provide justification for varying from the Required Channels per Function nomenclature specified in TSTF-542, e.g., “1” as opposed to “1 per subsystem.”

Function	Required Channels Per Function	
	PNPP TS Table 3.3.5.2-1	TSTF-542 STS Table 3.3.5.2-1
1.e Manual Initiation	1	[1 per subsystem]
2.a Reactor Vessel Pressure – Low (LPCI Injection Valve Permissive)	1 per subsystem	[3]
2.c Manual Initiation	1	[1 per subsystem]

Response:

For the Functions identified in the request for additional information, TSTF-542 identified each value with brackets, indicating that plant-specific differences may be reflected. In keeping with the construct of TSTF-542, the plant specific values for each of the bracketed items are discussed below.

Function 1.e, “Manual Initiation,” applies to the low pressure coolant injection (LPCI)-A and low pressure core spray (LPCS) subsystems. For PNPP Function 1.e, there is only one manual initiation switch for both LPCI-A and LPCS subsystems, and it is located in the main control room. The “Required Channels per Function” designation of “1 per

subsystem” in TSTF-542 Table 3.3.5.2-1 is not applicable to the PNPP. Therefore, no changes are required for the Function 1.e “Required Channels Per Function” designation, as currently identified in the PNPP LAR.

Currently, PNPP’s TS Table 3.3.5.1-1, “Emergency Core Cooling System Instrumentation,” Function 2.d, “Reactor Vessel Pressure - Low (LPCI Injection Valve Permissive),” which applies to the LPCI-B and LPCI-C subsystems in Modes 1, 2, 3, 4, and 5, specifies one required channel per subsystem. The proposed license amendment relocates the Mode 4 and 5 applicability for Function 2.d to Table 3.3.5.2-1 as Function 2.a and maintains the one required channel per subsystem applicability. This is appropriate since the designation of “3” required channels per function for Function 2.a in TSTF-542 Table 3.3.5.2-1 is not applicable to the PNPP. Function 2.a applies to only two PNPP subsystems and thus it has only two channels (one per subsystem). Therefore, no changes are required for the Function 2.a “Required Channels Per Function” designation, as currently identified in the PNPP LAR.

Function 2.c, “Manual Initiation,” applies to the LPCI-B and LPCI-C subsystems. For PNPP Function 2.c, there is only one manual initiation switch for both LPCI-B and LPCI-C subsystems, and it is located in the main control room. The “Required Channels Per Function” designation of “1 per subsystem” in TSTF-542 Table 3.3.5.2-1 is not applicable to the PNPP. Therefore, no changes are required for the Function 2.c “Required Channels Per Function” designation, as currently identified in the PNPP LAR.

**Attachment 2
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**Revised Markup of Technical Specification Page 3.3-43b
(1 page follows)**

