

## NRR-DMPSPEm Resource

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**From:** Green, Kimberly  
**Sent:** Thursday, August 16, 2018 8:55 AM  
**To:** Lashley, Phil H. (phlashley@firstenergycorp.com)  
**Subject:** Perry Nuclear Power Plant, Unit No. 1 - Transmittal of Audit Plan and Request for Set Up of Online Reference Port related to FENOC Request to Extend Containment Leakage Test Frequency (EPID L-2018-LLA-0055)  
**Attachments:** Perry ILRT Audit Plan.docx

Dear Mr. Lashley:

By letter dated March 7, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18066A648), FirstEnergy Nuclear Operating Company (FENOC) submitted a license amendment request (LAR) regarding the Perry Nuclear Power Plant, Unit No. 1 (PNPP). The proposed amendment would revise Technical Specification 5.5.12, "Containment Leakage Rate Testing Program," to follow the guidance provided in Nuclear Energy Institute (NEI) 94-01, Revision 3-A, "Industry Guideline for Implementing Performance Based Option of Title 10 of the Code of Federal Regulations (10 CFR), Part 50, Appendix J," with conditions and limitations specified in NEI 94-01, Revision 2-A (having the same title as Revision 3-A).

To improve the efficiency of the U.S. Nuclear Regulatory Commission's (NRC) review, the NRC staff have discussed with FENOC the use of an audit using an online reference portal that would allow the NRC staff limited read-only access to documents cited in the application. The staff plans to initially conduct a desk audit to review the documentation provided on the portal. The online reference portal would allow the NRC staff to audit documents to determine whether the information included in the documents is necessary to reach a safety conclusion on the application. FENOC will be formally requested to submit those documents on the NRC docket. Use of the online reference portal is acceptable, as long as the following conditions are met:

- the online reference portal will be password-protected and passwords will be assigned to those directly involved in the review on a need-to-know basis;
- the online reference portal will be sufficiently secure to prevent staff from printing, saving, or downloading any documents; and
- conditions of use of the online reference portal will be displayed on the login screen and will require concurrence by each user.

The NRC staff would like to request that the portal be populated with the document(s) listed in the attachment. This is the initial list identified by the NRC staff. The staff may request additional documents during the review, which will be transmitted to you via email. This audit will potentially obviate the need for an onsite audit and potential requests for additional information. Please provide NRC staff access to the portal and send me the information needed to access the portal, such as username and password, as soon as possible.

The conditions associated with the online reference portal must be maintained throughout the duration of the review process. Please provide written confirmation that FENOC agrees to the terms and conditions set forth in this email.

If you have any questions, please contact me.

Kimberly Green  
(301) 415-1627  
[kimberly.green@nrc.gov](mailto:kimberly.green@nrc.gov)

**Hearing Identifier:** NRR\_DMPS  
**Email Number:** 523

**Mail Envelope Properties** (Kimberly.Green@nrc.gov20180816085400)

**Subject:** Perry Nuclear Power Plant, Unit No. 1 - Transmittal of Audit Plan and Request for Set Up of Online Reference Port related to FENOC Request to Extend Containment Leakage Test Frequency (EPID L-2018-LLA-0055)

**Sent Date:** 8/16/2018 8:54:49 AM

**Received Date:** 8/16/2018 8:54:00 AM

**From:** Green, Kimberly

**Created By:** Kimberly.Green@nrc.gov

**Recipients:**

"Lashley, Phil H. (phlashley@firstenergycorp.com)" <phlashley@firstenergycorp.com>

Tracking Status: None

**Post Office:**

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	2836	8/16/2018 8:54:00 AM
Perry ILRT Audit Plan.docx		40770

**Options**

**Priority:** Standard

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**

**AUDIT PLAN**  
**LICENSE AMENDMENT REQUEST TO EXTEND CONTAINMENT LEAKAGE TEST**  
**FREQUENCY**  
**FIRSTENERGY NUCLEAR OPERATING COMPANY**  
**PERRY NUCLEAR POWER PLANT**

I. BACKGROUND

By letter dated March 7, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18066A648), FirstEnergy Nuclear Operating Company (FENOC, the licensee) submitted a license amendment request (LAR) regarding the Perry Nuclear Power Plant, Unit No. 1 (PNPP). The proposed amendment would revise Technical Specification 5.5.12, "Containment Leakage Rate Testing Program," to follow the guidance provided in Nuclear Energy Institute (NEI) 94-01, Revision 3-A, "Industry Guideline for Implementing Performance Based Option of Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Appendix J," with conditions and limitations specified in NEI 94-01, Revision 2-A (having the same title as Revision 3-A). The NRC staff has reviewed FENOC's submittal and determined that a regulatory audit of the PNPP independent assessment, performed as part of the PRA model process, would assist in the timely completion of the subject LAR review process.

II. REGULATORY AUDIT BASES

The audit will be performed consistent with NRC Office of Nuclear Reactor Regulation Office Instruction LIC-111, "Regulatory Audits," dated December 29, 2008 (ADAMS Accession No. ML082900195). An audit was determined to be the most efficient approach toward a timely resolution of issues associated with this LAR review, and will enable the staff to minimize the potential for multiple rounds of requests for additional information (RAIs) and ensure no unnecessary burden will be imposed by requiring FENOC to address issues that are not necessary to make a safety determination.

The NRC staff is requesting an initial set of documentation to be reviewed at the NRC headquarters via an online reference portal. Upon completion of this desk audit, the staff is expected to achieve the following.

1. Determine the need for additional documentation.
2. Develop an RAI as needed.
3. Decide if a site audit is required to verify information.

Any RAIs will be issued soon after the audit, with an expected response being submitted by FENOC by an agreed upon date. Any information reviewed during the audit that is needed to support the NRC staff's safety evaluation will be requested to be submitted on the docket.

III. PURPOSE AND SCOPE

The purpose of the audit is to gain a more detailed understanding of the FENOC's independent assessment as part of the PRA model process used by the licensee to support the

categorization process, and to gain more information relevant to the review of the subject LAR. Specifically, the NRC staff will be given an overview of the licensee's independent assessment as part of the PRA process, discuss the identified issues related to acceptability of the licensee's independent assessment for this application, the unique technical aspects of using this independent assessment in the licensee's categorization process, and gain better understanding of the licensee's approach to identify and address the key assumptions and key sources of uncertainty for this application.

#### IV. AUDIT TEAM

The members of the audit team are anticipated to be:

- Kimberly Green, Project Manager, NRC
- Keith Tetter, technical reviewer, PRA, NRC

#### V. LOGISTICS

The audit will be started once the online reference portal is set up and the documentation is made available to the NRC staff. The desk audit will be conducted over a few weeks consistent with the internal review schedule for the issuance of the request for additional information. FENOC will be kept informed on a regular basis during bi-weekly discussions with the project manager regarding the progress.

#### VI. DOCUMENTS REQUESTED FOR STAFF REVIEW

The following documentation should be available on the online reference portal:

- PNPP independent assessment as mentioned in Section 3.3.2.1 of the LAR
- Documents that include discussions on identification of key assumptions and sources of uncertainty for the PNPP independent assessment with licensee disposition relevant to this application

#### VII. DELIVERABLES

An audit summary will be prepared within 90 days of the completion of the audit. If information evaluated during the audit is needed to support a regulatory decision, the NRC staff will identify it in a request for additional information. The NRC staff will provide the request for additional information to FENOC in separate docketed correspondence.