

June 25, 2019  
L-19-161

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

**SUBJECT:**

Perry Nuclear Power Plant, Unit No. 1  
Docket No. 50-440, License No. NPF-58  
Deviation from BWRVIP-139 Revision 1-A: "BWR Vessel and Internals Project, Steam  
Dryer Inspection and Flaw Evaluation Guidelines"

In accordance with Nuclear Energy Institute (NEI) 03-08, "Guideline for the Management of Materials Issues," FirstEnergy Nuclear Operating Company (FENOC) is informing the Nuclear Regulatory Commission (NRC) of a deviation from BWRVIP-139 Revision 1-A.

The following is a summary of the technical justification for the deviation from the inspection frequency requirements of BWRVIP-139 Revision 1-A for the steam dryer baseline re-inspection. This information is being provided for information only by FENOC for the Perry Nuclear Power Plant (PNPP), Unit No. 1. FENOC is not requesting any action from the NRC staff.

Specifically, FENOC is deviating from BWRVIP-139 Revision 1-A, Section 5.3.4 (D) for PNPP. This guidance requires FENOC to re-inspect all key locations and a 10 percent sampling of other locations every 10 years. FENOC performed baseline inspections of the required PNPP steam dryer locations in 2009 and would be required to perform re-inspection on known locations, with the subsequent 10-year re-inspections due in 2019. The decision to extend the inspection period another two years was made for numerous financial and radiological dose considerations to align with the end of the last planned refueling cycle, which is scheduled to end in the spring of 2021. By letter dated April 25, 2018, FirstEnergy Solutions Corp. announced plans to retire the PNPP, permanently ceasing power operations by May 31, 2021. Safe and event-free operation of the steam dryer during the extended two-year period is supported by the structural integrity that was observed on the dryer during examinations completed in the 2009, 2011, 2013, 2015, and 2017 refueling outages. A review of steam dryer inspections supports the conclusion that sufficient structural integrity exists to warrant a two-year delay of re-inspection. The structural integrity of the dryer is monitored by PNPP's Chemistry Department during power operations via carryover analysis. Based upon moisture carryover trends, there has been no indication of a decrease in steam dryer structural integrity.

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The duration of this deviation is from spring 2019 to May of 2021 (planned cessation of power operations).

By letter dated June 6, 2019 the Electric Power Research Institute Boiling Water Reactor Vessel and Internals Project program manager has been notified of the aforementioned needed deviation for the PNPP steam dryer baseline re-inspection.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Phil H. Lashley, Acting Manager – Fleet Licensing at (330) 315-6808.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank R. Payne", with a horizontal line extending to the right.

Frank R. Payne  
Site Vice President

cc: NRC Region III Administrator  
NRC Project Manager  
NRC DLR Project Manager  
NRC Resident Inspector