



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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ANSWERBACK: CEI PRYO

Al Kaplan

VICE PRESIDENT  
NUCLEAR GROUP

*Serving The Best Location in the Nation*  
PERRY NUCLEAR POWER PLANT

February 2, 1990  
PY-CEI/NRR-1126 L

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D. C. 20555

Perry Nuclear Power Plant  
Docket No. 50-440  
Follow Up to Letter on  
Seismic Margins Evaluation

Gentlemen:

This letter provides an update related to the performance of a seismic margin evaluation for the Perry Nuclear Power Plant (PNPP). The Cleveland Electric Illuminating Company (CEI) has been following the developments in technical bases for conducting seismic margin evaluations at nuclear facilities since 1982 when the ACRS first raised the issue for Perry, and again at the March 13, 1986 ACRS 311th meeting which reviewed the January 31, 1986 earthquake near Leroy, Ohio.

In our July 21, 1988 letter to the staff (PY-CEI/NRR-0876 L) we indicated our intent to carry out a seismic margins study when clear and final guidance was available, and with the understanding that the study could resolve multiple seismic issues including seismic severe accidents. Based on the knowledge available at that time we anticipated a schedule consisting of completion of the preparatory work, walkdowns and specific system/component/structure evaluations by end of the second refueling outage, and implementation of any required modifications by end of the third refueling outage. This schedule was based on final NRC guidance becoming available in 1989.

In the interim time frame we have followed closely the NRC staff's development of guidance in this area and have continued participation in the Seismic Owners Group (SOG) activities and the Seismic Issues Working Group (SIWG) of NUMARC. Additionally we reviewed and commented (through NUMARC) on the draft Generic Letter on Individual Plant Examinations of External Events (IPEEE) which addresses seismic margins as a resolution mechanism for the seismic portion of IPEEE.

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As a result of these activities, we have concluded that sufficient guidance is not available to proceed with this activity on the schedule proposed in our July 21, 1988 letter. Instead, CEI believes it prudent to await issuance of the IPEEE Generic Letter (which we understand will contain the final guidance on seismic margin methodology) before further developing our program. As noted in NRR letter dated March 30, 1989 (TAC No. 72197), there is a need to inject industry and regulatory guidance into the seismic margin study. We have informed our consultants of our intent to put this project on hold until final guidance is available.

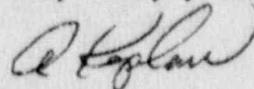
Additionally, there are several benefits to scheduling analysis of externally initiated severe accidents after preliminary development of the internal IPE which will commence in early 1990. Those benefits are (1) definition of potential "success paths" within the normal IPE development, (2) development of CEI personnel in severe accident analysis concepts and techniques which can be applied to IPEEE and (3) balancing of resources to avoid overlapping projects.

Therefore it is our intent to conduct our seismic margin study within the context of resolving severe accidents under the IPEEE program following issuance of the related Generic Letter. We will evaluate our options within this program as it evolves and may elect to identify seismic margins at PNPP by either seismic probabilistic risk assessment (SPRA) techniques or the EPRI/NRC "seismic margins" approach. Our approach will depend upon our understanding of the technical issues at that time. This represents the normal progression of conducting IPE and IPEEE studies in a logical and prudent path.

Please contact us by March 5, 1990 should this schedule change not be acceptable to the staff or the ACRS.

Should you have any questions, please feel free to call.

Very truly yours,



Al Kaplan  
Vice President  
Nuclear Group

AK:njc

Attachment

cc: T. Colburn  
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ACRS Subcommittee on Extreme External Phenomena