



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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Dalwyn R. Davidson

VICE PRESIDENT

SYSTEM ENGINEERING AND CONSTRUCTION

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November 30, 1981

Mr. Robert L. Tedesco
Assistant Director for Licensing
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Response to Request for
Additional Information -
Effluent Treatment Systems

Dear Mr. Tedesco:

This letter and its attachment is submitted to provide additional draft responses to the concerns identified in your letter dated August 27, 1981 in regard to Effluent Treatment Systems. This supplements our previous submittal dated October 15, 1981.

It is our intention to incorporate these responses in a subsequent amendment to our Final Safety Analysis Report.

Very Truly Yours,

Dalwyn R. Davidson
Vice President
System Engineering and Construction

DRD: mlb

Attachment

cc: G. Charnoff, Esq.
M. Dean Houston
NRC Resident Inspector

3001
S1/1
Add: Effluent Treatment
Sys Br

8112100207 811130
PDR ADDCK 05000440
A PDR

ETSB 6.5-2 No provision for control room recording of system air flow rates or pressure drops. No provision for measurement, indication, or recording of total system pressure drop ($\Sigma\Delta p$). No provision for status indication in control room of deluge valve positions, valve/damper operator position, or fan status.

Response

- a. The recording of system pressure drops is not required by ANSI N509-1976 item 4.8.2.
- b. The recording of system air flow rate is not considered to be relevant data. During proper system operation the recorder would only indicate a constant flow rate and would serve no useful purpose. Alarms are provided in the control room for the condition of either low or high air flow rate. To alarm (alarm points are pre-set prior to system operation) in the control room that either condition exists is the critical item, to record the exact flow rate at the point of alarm is not considered critical since this flow rate is already known from the alarm setpoint.
- c. Damper operation position and fan status are indicated on a control room panel as described in FSAR section 7.3.1.1.7 and Figure 9.4-1. Deluge valve actuation (control switch) is indicated via a light on a control room panel as noted in Figure 9.4-1.

ETSB 6.5-3 Total system $\Sigma\Delta p$ not provided. No provision for indication and recording of system flow rate in control room. Section 6.5.1.6, FSAR, references Section 6.5.3 for instrumentation and actuation requirements; correct reference is Section 7.3.1.

Response

- a. Recording of total system pressure drop is given as a requirement in ANSI N509-1980 but not in ANSI N509-1976 which is endorsed by Regulatory Guide 1.52 Revision 2 dated March, 1978 and used in the Perry design.
- b. With respect to indication and recording of system flow rate in the control room refer to subparagraph (b) of the response to ETSB Question 6.5.2.
- c. The referenced Section 6.5.3 will be corrected to reference the correct Section 7.3.1.

ETSB 6.5-4 Items not consistent with ANSI N509 and Regulatory Guide 1.52:

- Unit outlet flow not shown to be indicated or recorded in control room.
- Component or system pressure drops (Δp , $\Sigma \Delta p$) not indicated or recorded in control room.
- No status indication in control room of deluge valve position, valve/damper operator position.
- Section 6.5.1.5, FSAR, references Section 9.4.1 for instrumentation and actuation requirements; correct reference is Section 7.6.1.9.

Response

- a. Response to statement that the unit flow is not indicated or recorded in the control room is given in subparagraph (b) of the response to ETSB Question 6.5.2.
- b. Requirement for component or system pressure drops not indicated or recorded in the control room is discussed in sub-paragraph (a) of the response to ETSB Question 6.5.3.
- c. Deluge valve position (control switch) is indicated on a control room panel as noted in FSAR Figure 9.4-4. Dampers in the Fuel Handling Area Exhaust System are manual dampers and therefore do not have damper operators and no indication of operator position is required.
- d. Referenced Section 9.4.1 will be corrected to show the proper Section 7.6.1.9.