



PERRY NUCLEAR POWER PLANT
10 CENTER ROAD
PERRY, OHIO 44081
(216) 259-3737

Mail Address:
P.O. BOX 97
PERRY, OHIO 44081

Michael D. Lyster
Vice President - Nuclear

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U.S. Nuclear Regulatory Commission
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Perry Nuclear Power Plant
Docket No. 50-440
Technical Specification Change Request:
Miscellaneous Administrative Changes

Gentlemen:

Enclosed is a request for amendment to the Perry Nuclear Power Plant (PNPP) Unit 1 Facility Operating License NPF-58. In accordance with the requirements of 10CFR50.91(b)(1), a copy of this Request for Amendment has been sent to the State of Ohio as indicated below.

This Amendment Request proposes revision of PNPP Technical Specifications to incorporate miscellaneous administrative changes, including changes to the Administrative Control section, determined not likely to involve significant hazards considerations in accordance with previously published Commission guidance (51 FR 7751). Attachment 1 and 2 provide a summary of the proposed changes. Attachment 3 provides a copy of the marked up Technical Specification pages.

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

Sincerely,

Michael D. Lyster
Michael D. Lyster

9009280144 900913
PDR ADOCK 05000440
P PNU

MDL:CJF:njc

Attachments

cc: NRR Project Manager
Sr. Resident Inspector
USNRC Region III
State of Ohio

Operating Units
Cleveland Electric Illuminating
Toledo Edison

00120
A001
111

Summary/Safety Analysis

This Amendment Request proposes numerous administrative changes determined not likely to involve significant hazards considerations in accordance with previously published Commission guidance (51 FR 7751). A Summary/Safety Analysis of each proposed change along with a No Significant Hazards Analysis is provided below.

The reference to "Figure 6.2.1-1 Corporate Organization" and "Figure 6.2.2-1 Unit Organization" on page XXV of PNPP's Technical Specification index are to be deleted. These figures, along with pages 6-3 and 6-4, were deleted from the PNPP Technical Specifications on June 30, 1988 by Amendment No. 13. Therefore, the index references for Figures 6.2.1-1 and 6.2.2-1 are no longer applicable and should have been removed as part of Amendment No. 13. Removal of the index references to Figures 6.2.1-1 and 6.2.2-1 is a purely administrative change considered not likely to involve a significant hazards consideration.

Technical Specification 3.3.2, Table 3.3.2-1, Action 20 is being modified to provide the required actions to be taken during core alterations and operations with a potential for draining the reactor vessel (Operational Condition #). Per Table 3.3.2-1, the Primary Containment Isolation Trip Functions for Vessel Level 2 and Vessel Level 1 are applicable in Operational Conditions 1, 2, 3 and in Operational Condition #. However, Action 20 provides actions applicable only for Operational Conditions 1, 2 and 3 (be in at least Hot Shutdown within 12 hours and Cold Shutdown within the next 24 hours), while failing to provide actions applicable for Operational Condition #. Action 20 should also provide required actions for Operational Condition #. Therefore, Action 20 is revised to include the proper conservative actions to be taken in Operational Condition # (suspend core alterations and operations with a potential for draining the reactor vessel). This change is conservative and meets previously published Commission guidance on amendments not likely to involve a significant hazards consideration since the change constitutes an additional limitation, restriction or control not presently included in PNPP Technical Specifications.

Technical Specification Surveillance Requirement 4.3.7.7 is being changed to clarify that the traversing in-core probe system is required to be demonstrated operable prior to use when required for monitoring core thermal limits (APLHGR, LHGR, MCPR), as well as prior to recalibrating the LPRMs. Technical Specification 3.3.7.7 requires the traversing in-core probe system to be operable when used for recalibration of the LPRM detectors and when monitoring thermal limits. However, Surveillance Requirement 4.3.7.7 currently requires the in-core probe system to be demonstrated operable (by normalizing each of the required detector outputs within 72 hours prior to use) only when required for the LPRM calibration functions. After reviewing the Applicability, the Action Statements, and the Bases, it is apparent that the intent is to demonstrate TIP system operability prior to monitoring core

thermal limits, as well as prior to recalibrating the LPRMs. Therefore, Surveillance Requirement 4.3.7.7 is being revised to clarify when the TIP system shall be demonstrated operable. This change is conservative and meets the previously published guidance on amendments not likely to involve a significant hazards consideration since the change constitutes an additional limitation, restriction or control not presently included in PNPP Technical Specifications.

Technical Specification 3.3.7.7, item b, Applicability (page 3/4 3-82), lists the Maximum Fraction of Limiting Power Density (MFLPD) as one of the thermal limits, along with APLHGR, LHGR and MCPR. The MFLPD is a thermal limit that was used in part to define the "T factor" in PNPP's low power operating license (Facility Operating License NPP-45), Technical Specification 3.2.2, APRM Setpoints, but was eliminated as part of the Maximum Extended Operating Domain (MEOD) changes when PNPP's full power operating license (Facility Operating License NPP-58) Technical Specifications were approved. Deletion of the APRM Setpoints specification (and approval of MEOD) is discussed in Perry Supplemental Safety Evaluation Report (SSER) Number 10, Section 16.2.1, items 2 and 3. Since this limit is no longer utilized (as this method of APRM setpoint monitoring is not applied) it is appropriate to delete MFLPD as one of the thermal limits listed under the Applicability of Specification 3.3.7.7, item b. In addition, related Technical Specification definitions 1.15, Fraction of Limiting Power Density (FLPD) and 1.16, Fraction of Rated Thermal Power (FRTP) and their corresponding references within the Technical Specification Index are also to be deleted. These definitions are applicable only to terms used within the previously deleted APRM Setpoints specification 3.2.2 described above (FRTP was used to define the T factor). Since this specification no longer exists, the above definitions are no longer necessary within PNPP's Technical Specifications, and their deletion is considered not likely to involve a significant hazards consideration.

The footnote * Surveillance Requirement 4.3.8.2.c on page 3/4 3-97 is to be deleted. This footnote extended the initial surveillance test interval on a one time basis to the first refueling outage for demonstrating operability of the turbine overspeed protection system. Since PNPP's first refueling outage was completed on July 23, 1989 (first Operational Condition entry following refueling), this extension is no longer applicable. This change therefore constitutes a purely administrative change to PNPP Technical Specifications and is considered not likely to involve a significant hazards consideration.

The asterisks (*) contained within Technical Specification 3.4.1.4 on page 3/4 4-6 are to be deleted from the 50 degree F temperature differential limitations of Technical Specifications 3.4.1.4.a and 3.4.1.4.b. The associated footnote rendered the 100 degree F temperature differential limitation of Technical Specifications 3.4.1.4 and the 50 degree F temperature differential limitations of Technical Specification 3.4.1.4.a and 3.4.1.4.b not applicable below 25 psig. Removal of this exemption from the 50 degree F temperature differential limitations of Technical Specification 3.4.1.4.a and 3.4.1.4.b is a conservative change that constitutes an additional limitation,

restriction, or control not presently included in the Technical Specifications and is therefore considered not likely to involve a significant hazards consideration. This change will in no way affect the footnote as it applies to the 100 degree F temperature differential limitation of Technical Specification 3.4.1.4.

The # footnote contained on page 3/4 6-5 applicable to Surveillance Requirements 4.6.1.2.d and 4.6.1.2.h is to be deleted. This footnote provided a one time test interval extension to the first refueling outage for containment isolation valves listed in Table 3.6.4-1, which are identified in letter PY-CEI/NRR-0714L (dated September 11, 1987) as needing a plant outage to test. Since the referenced Type C test interval extension has expired with the completion of PNPP's first refueling outage, this note is no longer applicable. This change therefore constitutes a purely administrative change determined not likely to involve a significant hazards consideration.

Technical Specification 3.6.1.8.b is to be modified by replacing the limit for purge system operation of 3000-hours-per-365-days with a limit of 1000-hours-per-365-days (as provided in footnote ** on page 3/4 6-12) and by deletion of the footnote. According to the footnote, the 3000-hour-per-365-day limit was applicable only from initial fuel load until 3 months following the completion of the first refueling outage. Since PNPP's first refueling outage was completed July 23, 1989 (first Operational Condition 2 entry following refueling), the 3000-hours-per-365-day limit on purge system operation contained in Technical Specification 3.6.1.8.b has expired and is therefore no longer applicable. The currently applicable 1000-hour-per-365-day limit contained in the footnote is to be inserted directly into Technical Specification 3.6.1.8.b. This change is for clarification only and does not constitute a change in current Technical Specification 3.6.1.8.b limits on purge system operation, and therefore this is a purely administration change determined not likely to involve a significant hazards consideration. Note that consistent with the NRC's July 18, 1989 response to PNPP's "Containment Purge Evaluation and Technical Specification Change Request" letter PY-CEI/NRR-1025L dated June 30, 1989, PNPP has resolved to adhere to the 1000-hour-per-365-days containment purge limit contained in Technical Specification 3.6.1.8.b, unless PNPP can establish an adequate basis, based upon subsequent plant experience, that the existing limit of 1000-hours of operation per 365 days is inadequate. However, based upon second cycle containment purge system operating experience, PNPP has determined that, at this time, no current need exists to increase the current 1000-hours-per-365-day Technical Specification limit. Consequently, PNPP will not be submitting a second cycle re-evaluation of the purge system's operation as proposed in letter PY-CEI/NRR-1025L.

The Bases for Technical Specification 3/4.7.4 is to be corrected by changing the required sample size of additional snubbers required to be functionally tested for each functional test failure from 10% to 5% in Functional Test Method 1 on page B 3/4 7-3 (first sentence). This change (to 5% sample size) is consistent with the sample size requirements of Surveillance Requirement 4.7.4.e.1 which provides that "...for each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.4.f, an additional 5% of that type of snubber shall be functionally tested until no

more failures are found or until all snubbers of that type have been functionally tested." Note that Surveillance Requirement 4.7.4.e.1 contained in PNPP's low power operating license (Facility Operating License NPF-45) initially specified a 10% sample size of additional snubbers required to be tested for each functional test failure. This requirement was changed to 5% in the Technical Specifications issued with PNPP's full power operating license (Facility Operating License NPF-58). However, Bases 3/4.7.4 was never updated consistent with the change in sample size in Surveillance Requirement 4.7.4.e.1. This change to Bases 3/4.7.4 is a purely administrative change to correct the above error and to achieve consistency throughout PNPP's Technical Specifications. As such, this change is considered not likely to involve a significant hazards consideration.

Technical Specification 3.8.1.1, Action a, sentence 1 is to be revised by inserting the words "once per" to read as follows:

"With one offsite circuit of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter."

This change is a purely administrative change to achieve consistency and clarification and is considered not likely to involve a significant hazards consideration.

Table 4.8.1.1.2-1, note * on page 3/4 8-10 is to be corrected by replacing the reference to Surveillance Requirement 4.8.1.1.a.4 with 4.8.1.1.2.a.4 and by replacing the reference to Surveillance Requirement 4.8.1.1.a.5 with 4.8.1.1.2.a.5. These changes are purely administrative changes to correct existing errors and are determined not likely to involve a significant hazards consideration.

The following corrections are proposed for page B 3/4 3-5 of the Bases:

(1) In Bases Section 3/4.3.7.6, paragraph two, the third "OPERABLE" is changed to "OPERATIONAL" to read as follows: "The SRMs are required OPERABLE in OPERATIONAL CONDITION 2 to provide for rod block capability, and are required OPERABLE in OPERATIONAL CONDITIONS 3 and 4 to provide monitoring capability which provides diversity of protection to mode switch interlocks." This change maintains consistency with the term "OPERATIONAL CONDITION" as defined in Technical Specification Definition 3.30 (page 1-6).

(2) In Bases Section 3/4.3.7.7, paragraph two, sentence two, the word "be" is to be inserted between the final two words of the sentence to read as follows: "Monitoring core thermal limits may involve utilizing individual detectors to monitor selected areas of the reactor core, thus all detectors may not be required to be OPERABLE."

The above changes to Bases page B 3/4 3-5 are purely administrative changes designed to achieve consistency and correct errors and are considered not likely to involve significant hazards considerations.

For clarification, Bases Figure B3/4 3-1 on page B 3/4 3-8 is to be replaced with the figure provided in Attachment 3.

The remainder of the changes to PNPP's Technical Specifications requested by this amendment consist of changes to the Administrative Controls section necessitated by the April 1990 reorganization of CEI and its parent company, Centerior Energy Corporation (reference letter PY-CEI/NRR-1189L dated July 17, 1990). While the changes described below are in addition to those previously proposed by letter PY-CEI/NRR-1189L in response to the reorganization, the marked up pages contained in Attachment 3 have incorporated the previously proposed changes to the Administrative Controls Section for clarification. Note that the previously proposed changes consist solely of revision to the title of the Nuclear Vice President. The additional changes requested herein are as follows:

- (1) "Perry Plant Operations Department (PPOD)" has been retitled "Perry Nuclear Power Plant Department (PNPPD)." This change affects the following Technical Specifications: 6.1.1, 6.2.1.b, 6.5.1.1, 6.5.1.6.k, 6.5.1.7.a, 6.5.1.7.c, 6.5.3.1.a, 6.5.3.1.b, 6.5.3.1.c, 6.5.3.1.d, 6.5.3.1.f and 6.8.2. This change constitutes a change in title designation only.
- (2) "Nuclear Engineering Department (NED)" and "Perry Plant Technical Department (PPTD)" have been incorporated into a single department entitled "Perry Nuclear Engineering Department (PNED)" under the management of a single Director. Consequently, all references to "Nuclear Engineering Department (NED)" and "Perry Plant Technical Department (PPTD)" are to be changed to "Perry Nuclear Engineering Department (PNED)". This change affects the following Technical Specifications: 6.2.3.1, 6.2.3.4, 6.5.1.2 and 6.5.3.1.b. Included within the benefits to be gained by consolidation of the above departments are the sharing of nuclear operating experience and expertise, and more effective communication. This change has no effect on the technical qualifications necessary to operate PNPP. In addition, well defined lines of authority, responsibility and communication continue to exist for all activities assumed by the Director of the Perry Nuclear Engineering Department that affect the safe operation of the plant. The Director of the Perry Plant Technical Department has assumed the new role of Director of the Perry Nuclear Engineering Department.
- (3) Technical Specification 6.5.1.2 is to be changed to reflect the following organizational title changes: "Operations Section" is retitled "Perry Operations Section", "Technical Section" is retitled "System Engineering Section" and, "Maintenance Section" is retitled "Perry Maintenance Section." These changes are organizational title changes only and have no effect on existing lines of authority, responsibility and communications.

- (4) Technical Specification 6.5.3.1.a, sentence three is to be revised for clarification as follows: "Instructions shall be approved by appropriate management personnel as designated in writing by PORC, and approved by the appropriate section managers." This change is intended for clarification only.
- (5) Changes are also proposed to establish the plant manager, entitled "General Manager, Perry Nuclear Power Plant Department" as the single authority which Plant Operations Review Committee (PORC) advises on matters which come before it, and as the single authority responsible for approval on items addressed under Technical Specification Section 6.5.3, "Technical Review and Control" and 6.8, "Procedures/Instructions and Programs." In order to achieve this goal of establishing the General Manager, PNPPD, as single authority for the above items, the necessary changes, including removal of references to Directors of other Perry Departments, were made to the following Technical Specifications: 6.5.1.1, 6.5.1.6.k, 6.5.1.7, 6.5.3.1.a, 6.5.3.1.b, 6.5.3.1.c, 6.5.3.1.d, 6.5.3.1.f and 6.8.2.

The above changes to PNPP Technical Specification Administrative Controls section are purely administrative changes designed to provide consistency and clarification and are considered not likely to involve a significant hazards consideration.

No Significant Hazards Consideration

The Nuclear Regulatory Commission (NRC) has promulgated standards in 10CFR50.92(c) for determining whether a proposed amendment to a facility operating license involves no significant hazards considerations. A proposed amendment to an operating license involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment would not (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) Create the possibility of a new or different kind of accident than previously evaluated; or (3) Involve a significant reduction in a margin of safety.

This proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated since this Amendment Request proposes changes to PNPP Technical Specifications which either (1) constitute an additional limitation, restriction or control not presently included in PNPP Technical Specifications, or (2) constitute purely administrative changes designed to achieve consistency throughout PNPP Technical Specifications, provide clarification, correct existing errors, delete material no longer applicable to PNPP Technical Specifications or reflect minor changes in CEI organizational structure or title. The technical qualifications necessary to operate PNPP continue to be provided by the CEI

nuclear organization, and well-defined lines of authority, responsibility and communication continue to exist for all activities affecting the safety of the plant. Each of the proposed changes have been reviewed, and determined to result in no change to plant systems or have any affect on accident conditions or assumptions. They also do not affect possible initiating events for accidents previously evaluated, or any system functional requirements.

The proposed amendment does not create the possibility of a new or different kind of accident. As stated above, the proposed changes are either administrative in nature which do not create the possibility of any new or different kind of accident or constitute additional limitations, restrictions or control not presently included in PNPP Technical Specifications. The proposed changes do not create the possibility of a new or different kind of accident since they do not affect the reactor coolant pressure boundary or other plant systems or structures in such a manner that could initiate any new or different kind of accident. In addition, the proposed changes do not adversely affect any system functional requirements nor plant maintenance or operability requirements in such a manner that could initiate any new or different kind of accident.

The proposed amendment does not involve a significant reduction in the margin of safety since it is administrative in nature, and does not affect any USAR design or accident assumptions. And, except for the correction of errors, the proposed changes do not affect any Technical Specification Bases.

Environmental Consideration

The proposed Operating License amendment and Technical Specification changes have been reviewed against the criteria of 10CFR51.22 for environmental considerations. As shown above, the proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, CEI concludes that the proposed Technical Specification changes meet the criteria given in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

<u>TECHNICAL SPECIFICATION PAGE</u>	<u>CHANGE</u>	<u>REASON</u>
XXV	Delete reference to "Figure 6.2.1-1 Corporate Organization" and "Figure 6.2.2-1 Unit Organization"	These referenced figures along with pages 6-3 and 6-4 were deleted from PNPP Technical Specifications on June 30, 1988 by Amendment No. 13.
3/4 3-15	Change Table 3.3.2-1, Action 20 to include action applicable for Operational Condition #	Primary Containment Isolation Trip Functions for Vessel Level 2 and 1 are applicable in Op Con #, but associated Action 20 fails to provide action applicable for Op Con #.
3/4 3-82	Revise Surveillance Requirement 4.3.7.7 to require the traversing in-core probe system to be demonstrated operable prior to use when required for monitoring core thermal limits as well as when required for recalibration of LPRM detectors.	To clarify when TIP System shall be demonstrated operable.
3/4 3-82	Delete "MFLPD."	No longer applicable.
1-3	Delete definitions 1.15 (FLPD) and 1.16 (FRPT).	No longer applicable.
i (Index)	Delete references to definitions 1.15 (FLPD) and 1.16 (FRPT) in Index.	No longer applicable.
3/4 3-97	Delete note extending initial surveillance test on a one-time basis to the first refueling outage for Surveillance Requirement 4.3.8.2.c.	No longer applicable.
3/4 4-6	Remove Asterisks from 50°F temperature differential limitation of Technical Specifications 3.4.1.4.a and 3.4.1.4.b, thereby removing "below 25 psig" exception contained in note.	More restrictive.
3/4 6-5	Delete note * providing for a one-time test interval extension to the first refueling outage for Type C tests applicable to Surveillance Requirements 4.6.1.2.d and 4.6.1.2.h.	No longer applicable.
3/4 6-12	Modify Technical Specification 3.6.1.8.b by changing the time limitation for purge system operation from 3000 hours to 1000 hours per 365 days and delete note ** providing for applicability of 3000 hour limitation from initial fuel load until 3 months following completion of the first refueling outage.	For clarification only. 3000 hour limitation is no longer applicable.

<u>TECHNICAL SPECIFICATION PAGE</u>	<u>CHANGE</u>	<u>REASON</u>
B 3/4 7-3 First Sentence	Change the required sample size of additional snubbers required to be functionally tested for each functional test failure from 10% to 5% in Test Method 1 consistent with that required by Surveillance Requirement 4.7.4.e.1.	Correction.
3/4 8-1	Insert the words "once per" in the first sentence of Technical Specification 3.8.1.1 Action a as indicated in Attachment 3.	To achieve consistency.
3/4 8-10	Revise Table 4.8.1.1.2-1, note *, paragraph 2, sentence 3, by replacing the reference to Surveillance Requirement 4.8.1.1.a.4 with 4.8.1.1.2.a.4 and 4.8.1.1.a.5 with 4.8.1.1.2.a.5.	Correction.
B 3/4 3-5	Change third "OPERABLE" in Bases 3/4.3.7.6 paragraph 2 to "OPERATIONAL"	Correction
B 3/4 3-5	Insert the word "be" in Bases 3/4.3.7.7, paragraph 2, sentence 2, between the last two words "to" and "OPERABLE"	Correction
B 3/4 3-8	Replace Bases Figure B 3/4 3-1.	Clarification
6-1 6-8 6-9 6-10 6-14 6-15 6-16	Change "Perry Plant Operations Department (PPOD)" to "Perry Nuclear Power Plant Department (PNPPD)" in the following Technical Specifications: 6.1.1, 6.2.1.b, 6.5.1.1, 6.5.1.6.k, 6.5.1.7.a, 6.5.1.7.c, 6.5.3.1.a, 6.5.3.1.b, 6.5.3.1.c, 6.5.3.1.d, 6.5.3.1.f, 6.8.2	Change in title only.
6-7 6-14	Change "Nuclear Engineering Department (NED)" to "Perry Nuclear Engineering Department (PNED)" in the following Technical Specifications: 6.2.3.1, 6.2.3.4, 6.5.3.1.b.	Change in title only. ("Nuclear Engineering Department" and "Perry Plant Technical Department" have been incorporated into "Perry Nuclear Engineering Department").
6-8	Change "Perry Plant Technical Department (PPTD)" to "Perry Nuclear Engineering Department (PNED)" in the following Technical Specifications: 6.5.1.2.	"Perry Plant Technical Department (PPTD)" and "Nuclear Engineering Department (NED)" have been incorporated into "Perry Nuclear Engineering Department (PNED)".
6-8	Change "Operations Section" to "Perry Operations Section" in Technical Specification 6.5.1.2.	Change in title only.

<u>TECHNICAL SPECIFICATION PAGE</u>	<u>CHANGE</u>	<u>REASON</u>
6-8	Change "Technical Section" to "Systems Engineering Section" in Technical Specification 6.5.1.2.	Change in title only.
6-8	Change "Maintenance Section" to "Perry Maintenance Section" in Technical Specification 6.5.1.2.	Change in title only.
6-14	Revise Technical Specification 6.5.3.1.a sentence three to read as follows: "Instructions shall be approved by appropriate management personnel as designated in writing by PORC, and approved by the appropriate <u>section managers</u> ."	For clarification.
6-8 6-9 6-10 6-14 6-15 6-16	Delete reference to Director, Perry Plant Technical Department (PPTD) in Technical Specifications 6.5.1.1, 6.5.1.6.k, 6.5.1.7.a, 6.5.3.1.a, 6.5.3.1.b, 6.5.3.1.c, 6.5.3.1.d, 6.5.3.1.f and 6.8.2, and delete reference to Director, Nuclear Support Department in Technical Specification 6.5.3.1.f.	To establish General Manager, PNPPD, as single authority which Plant Operations Review Committee (PORC) advises on matters which come before it and as the single authority responsible for approval on items addressed under Technical Specifications Sections 6.5.3.6.8.