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Docket Nos.: 50-440
 and 50-441

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Dear Mr. Edelman:

Subject: Request for Additional Information Regarding Plant Specific
 Application of BWR Owners Group Safety/Relief Valve Operability
 Test Results to the Perry Nuclear Power Plant (Units 1 and 2)

In a letter dated October 8, 1981 (D. R. Davidson to D. G. Eisenhut), the Cleveland Electric Illuminating Company (CEI) agreed to participate in the BWR Owners Group for addressing the guidelines of TMI Action Plan Item II.D.1 (NUREG-0737), pertaining to safety and relief valve operability requirements. Since then, the BWR Owners Group submitted a final report on this subject, namely, GE Technical Report NEDE-24988-P, entitled, "Analysis of Generic BWR Safety/Relief Valve Operability Test Results."

In order for the NRC staff to complete its review of CEI's conformance with TMI Action Plan Item II.D.1 (Confirmatory Issue (7) in the Perry SER, Section 1.10), the applicability of the generic test results presented in NEDE-24988-P, specifically related to the safety/relief valves employed in the Perry plant, must be addressed and justified by CEI. In providing your justification, CEI is requested to respond to the enclosed list of concerns arising from the NRC staff's review to date of NEDE-24988-P, and thoroughly indicate the basis for your conclusion that the BWR Owners Group test results are applicable to the Perry safety/relief valves.

Please advise the project manager, John J. Stefano, when we may expect to receive a response, within 7 days after receipt of this letter.

Sincerely,

Original signed by:
 Gordon E. Edison

for
 B. J. Youngblood, Chief
 Licensing Branch No. 1
 Division of Licensing

Enclosure:
 As stated

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DATE			02/04/83	02/4/83		

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ENCLOSURE

REQUEST FOR ADDITIONAL INFORMATION BY THE
EQUIPMENT QUALIFICATION BRANCH

TMI ACTION PLAN II.D.1

Prior submittals do not provide the basis for the conclusion that the test results presented in NEDE-24988-P on safety/relief valve testing are applicable to your specific plant. Describe the basis thoroughly, as indicated below.

- 271.1 The test program utilized a "rams head" discharge pipe configuration. Most plants utilize a "tee" quencher configuration at the end of the discharge line. Describe the discharge pipe configuration used at your plant and compare the anticipated loads on valve internals in the plant configuration to the measured loads in the test program. Discuss the impact of any differences in loads on valve operability.
- 271.2 The test configuration utilized no spring hangers as pipe supports. Plant specific configurations do use spring hangers in conjunction with snubber and rigid supports. Describe the safety relief valve pipe supports used at your plant and compare the anticipated loads on valve internals for the plant pipe supports to the measured loads in the test program. Describe the impact of any differences in loads on valve operability.
- 271.3 Report NEDE-24988-P did not report any valve functional deficiencies or anomalies encountered during the test program. Describe the impact of valve safety function of any valve functional deficiencies or anomalies encountered during the program that were not reported.
- 271.4 The purpose of the test program was to determine valve performance under conditions anticipated to be encountered in the plants. Describe the events and anticipated conditions at the plant for which the valves are required to operate and compare these plant conditions to the conditions in the test program. Describe the plant features assumed in the event evaluations used to scope the test program and compare them to the features at your plant. For example, describe high level trips to prevent water from entering

the steam lines under high pressure operating conditions as assumed in the test event and compare them to trips used at your plant.

- 271.5 The valves are likely to be extensively cycled in a controlled depressurization mode in a plant specific application. Was this mode simulated in the test program? What is the effect of this valve cycling on valve performance and probability of the valve to fail open or to fail close?
- 271.6 Describe how the values of valve C_v 's in report NEDE-24988-P will be used at your plant. Show that the methodology used in the test program to determine the valve C_v will be consistent with the application at your plant.