

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

October 26, 1990 PY-CEI/ACOE-0009 L

John W. Morris, Colonel Regulatory Branch U.S. Army Corps of Engineers 1776 Niagara Street Buffalo, N.Y. 14207-3199

Dear Colonel Morris:

We received your request for a response in writing to the issues raised in the letters from Ohio Department of Natural Resources (ODNR) dated 9/18/90, and the U.S. Fish and Wildlife Service (USFWS), dated 10/2/90.

The primary concern of the ODNR and USFWS is that the partially submerged barges do not constitute an appropriate shoreline protection strategy for the Perry Plant. Our response is to point out that the barges have provided effective protection for the updrift shoreline. This was demonstrated in the previously submitted shoreline and bluff monitoring records. However, after conducting an additional off-shore survey this summer, we recognize that there may be a potential weakness in relying on the barges for long term protection, and that alternatives should be examined.

Therefore, we are modifying our request for continued <u>long term</u> utilization of the barge slip for shoreline erosion control. We request that the barge installation remain in place for approximately two years to serve as interim shore protection until a permanent seawall is erected. This will allow time for CEI to evaluate options and allow for additional dialogue with the Corps. In addition, CEI will obtain any necessary permits or leases which may be required by the ODNR, prior to constructing new shoreline protection.

The details of our enhanced shore protection plan are being developed by the plant engineering department. They will be submitted for your review along with an implementation schedule prior to March 18, 1991.

Contact us if you need additional information. Please notify us of your decision at the earliest possible convenience.

Sincepaly,

Michael D. Lyster

MDL: LKB: njc

cc: USNRC Document Control Desk / USNRC Project Manager

USNRC Resident Office

Operating Units Cleveland Electric Illuminating Toledo Edison

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