



**CENTERIOR
ENERGY**

PERRY NUCLEAR POWER PLANT

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Robert A. Stratman
VICE PRESIDENT - NUCLEAR

July 14, 1994
PY-CEI/NRR-1818L

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

Perry Nuclear Power Plant
Docket No. 50-440
Implementation of Amendment 57

Gentlemen:

Amendment 57 to the Perry Nuclear Power Plant (PNPP) Technical Specifications was issued on March 23, 1994, and is being implemented on July 15, 1994. This amendment included changing the peak accident pressure P_a from 11.31 psig to 7.80 psig. Thus, after July 15, 1994, any new Technical Specification required leak rate testing will be performed using the 7.80 psig value.

Attachment 1 to the initial submittal requesting this change (PY-CEI/NRR-1510L dated June 24, 1992) specifically requested that acknowledgment be made in the NRC's Safety Evaluation Report (SER) that all leak tests performed using the old P_a limit continue to remain valid until the next regularly scheduled performance for each test which falls after the implementation date. Although not addressed in the SER, PNPP considers this position to be valid and necessary to avoid unneeded re-testing after July 15, 1994 due to the change in pressure limits.

The June 24, 1992 submittal also provided a formula to be used in trending to help correlate values tested using the new lower pressure limit. In order to correlate any new test data using the lower pressure with the existing test data performed at 11.31 psig, the formula presented in Attachment 1 of the June 24, 1992 submittal will be used. The total leakage limits will also be adjusted using this formula to determine whether the Technical Specification leakage requirements are being met. This adjustment will be used until applicable leak rate tests have been performed at their next Technical Specification required frequency using the newly approved P_a .

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Operating Companies
Cleveland Electric Illuminating
Toledo Edison

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These positions were discussed with Mr. J. Hopkins, Project Manager, Nuclear Reactor Regulation, at the Perry Nuclear Power Plant on July 7, 1994.

If you have questions or require additional information, please contact Mr. James D. Kloosterman, Manager - Regulatory Affairs, at (216) 280-5833.

Very truly yours,


for Robert A. Stratman

RAS:GGR:sc

cc: NRC Project Manager
NRC Resident Inspector Office
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