



**CENTERIOR
ENERGY**

PERRY NUCLEAR POWER PLANT

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VICE PRESIDENT - NUCLEAR

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

Perry Nuclear Power Plant
Docket No. 50-440
Response to Generic Letter
91-11: Resolution of
Generic Issues 48 and 49

Gentlemen:

Generic Letter 91-11 requested information from each licensee in order to contribute to closure of Generic Issues 48, "LCOs for Class 1E Vital Instrument Buses," and 49, "Interlocks and LCOs for Class 1E Tie Breakers." As reflected in Enclosure 1 to the Generic Letter, Generic Issue 48 addresses administrative controls governing operational restrictions for Class 1E 120 volt AC vital instrument buses (VIBs) and associated inverters. Without such operational restrictions, the normal or alternate power sources for one or more VIBs could be out of service indefinitely, which leads to the concern of the Generic Issue that certain safety systems could be prevented from meeting some plant design basis scenarios, including a loss of offsite power and/or a single failure. Implementation of the BWR/6 Standard Technical Specification format has precluded the occurrence of this condition as further discussed below.

As described within the Bases to the PNPP Technical Specifications for Specification 3.8.3.1, the operability of the power sources is consistent with the initial condition assumptions of the safety analyses and is based upon maintaining at least Division 1 or 2 of the onsite AC and DC power sources and associated distribution systems operable during accident conditions coincident with an assumed loss of offsite power and single failure of the other onsite AC or DC source. Division 3 supplies the high pressure core spray (HPCS) system only and does not have any Class 1E 120 volt AC vital instrument bus associated with it.

PNPP Technical Specification Limiting Conditions for Operation (LCOs) 3.8.3.1.a.1.e and 3.8.3.1.a.2.e provide for the vital instrument buses to be normally energized from the associated division's inverter. The inverters are battery backed and are therefore operable in the event of a loss of offsite power. In the event an inverter is inoperable, Action statement 3.8.3.1.a is invoked; it requires that the Division (the inverter in this case) be restored to service within 8 hours or the plant must be in hot shutdown within the next 12 hours and in cold shutdown within the following 24 hours. Therefore, operation with an inverter out of service is severely restricted.

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Operating Companies
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The removal of an alternate power supply from service is not a concern with respect to meeting the design basis response to a loss of offsite power and/or a single failure, due to the Technical Specification controls placed upon the operability of the normal inverter supplies. This is because, as discussed above, the normal inverter supplies are required to be available for response to such events, and upon loss of an inverter continued plant operation is severely restricted.

Generic Issue 49 is concerned with the possibility of plants operating with tie breakers closed between normally independent, redundant Class 1E AC or DC buses within one unit, or between units at the same site. The PNPP design is such that there are no tie breakers between redundant safety-related AC buses (controls over DC buses were described in our response to Generic Letter 91-06). Therefore, the types of concerns described within the Generic Letter with respect to Generic Issue 49 are precluded by the PNPP design.

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

Sincerely,



Michael D. Lyster

MDL:RAL:ss

Attachment

cc: NRC Project Manager
NRC Resident Inspector Office
NRC Region III

Michael D. Lyster who, being duly sworn, deposed and said that (1) he is Vice President - Nuclear - Perry of the Centerior Service Company, (2) he is duly authorized to execute and file this report on behalf of The Cleveland Electric Illuminating Company and Toledo Edison Company, and as the duly authorized agent for Duquesne Light Company, Ohio Edison Company, and Pennsylvania Power Company, and (3) the statements set forth therein are true and correct to the best of his knowledge, information and belief.

Michael D. Lyster
Michael D. Lyster

Sworn to and subscribed before me, this 27th day of January,
1992.

Jane E. Mott
JANE E. MOTT
Notary Public, State of Ohio
My Commission expires Feb. 27, 1993
(Recorded in Lake County)