



**CENTERIOR
ENERGY**

PERRY NUCLEAR POWER PLANT

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VICE PRESIDENT - NUCLEAR

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PY-CEI/NRR-1502 L

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

Perry Nuclear Power Plant
Docket No. 50-440
Confirmation of Incorporation
of Drywell Unidentified Leakage Rate
Increase Limit into Plant Procedures

Gentlemen:

This letter provides confirmation that the commitment contained in letter PY-CEI/NRR-1473 L dated April 14, 1992 to incorporate a new limit on Drywell unidentified leakage rate increases has been completed. The April 14, 1992 letter responded to the NRC Safety Evaluation dated February 10, 1992 regarding the Perry Nuclear Power Plant (PNPP) positions on Generic Letter 88-01 "NRC Position on IGSCC in PWR Austenitic Stainless Steel Piping."

The April 14, 1992 letter committed to include a new limit on Drywell unidentified leakage rate increases, i.e. for increases in rate of 2 gpm within 24 hours, into plant procedures. A commitment was also made to provide the wording of the procedure changes for NRC information prior to plant restart from this current refueling outage. As noted above, the first commitment has been completed, and submittal of this letter completes the second commitment.

Please find attached two pages from our plant procedures containing the wording that implements these commitments. The first page is from a procedure entitled "Conduct of Operations," and the second page is from an instruction entitled "Technical Specification Rounds."

If there are any questions, please feel free to call.

Sincerely,

Michael D. Lyster
Michael D. Lyster

MDL:BSF:ss

Attachment

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

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INFORMATION ONLY

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- 6.12.1 When it is determined that Operator Aid is needed, the preparer of the Aid will ensure that the Aid is shown as an attachment to a procedure/instruction. The procedure/instruction must list the location of the Aid. The Aid itself must include the procedure/instruction number. Approval of the procedure/instruction results in approval of the associated Operator Aids.
- 6.12.2 When possible, Operator Aids should be made in photoengraved, lamicoid, or other durable medium. Operator Aids should be posted in locations that are visible and convenient for personnel to use during performance of the related task. Informal marks, indications, or instructions that are made by pencil, pen, magic marker, or impression tape are not approved Operator Aids and are not permitted in the plant.
- 6.12.3 Posted Operator Aids shall be reviewed when revising or performing a Periodic Review on the procedure/instruction which contains the Aid as an Attachment. The preparer of the revision or Periodic review will ensure the following:
1. The Operator Aid is still needed.
 2. The information contained on the Operator Aid is current and applicable.
 3. The Operator Aid is posted in the correct location and is legible with no unauthorized markings or changes.

6.13 Reactor Coolant System Leakage <L01448>

- 6.13.1 Technical Specification 3.4.3.2, Reactor Coolant System Leakage is expected to be revised to include a requirement to direct a plant shutdown if UNIDENTIFIED LEAKAGE increases by greater than 2 gpm in any period of 24 hours or less. This is in response to Generic Letter 88-01 entitled "NRC Position on IGSCC In BWR Austenitic Stainless Steel Piping". The specific areas of concern are the service sensitive welds on the nozzles to the reactor vessel, which are classified as non-resistant to Intergranular Stress Corrosion Cracking (IGSCC).
- 6.13.2 Perry has committed to the NRC that until Technical Specifications are changed, administrative controls on UNIDENTIFIED LEAKAGE shall be established. The following controls shall be adhered to:
1. In OPERATIONAL CONDITION 1, Reactor Coolant System leakage shall be limited to a 2 gpm increase in UNIDENTIFIED LEAKAGE within any 24-hour period.
 2. With an UNIDENTIFIED LEAKAGE increase greater than 2 gpm within any 24-hour period, identify the source of the leakage increase as not being from service sensitive welds within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

