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February 7, 1985

Mr. John Stefano, Project Manager
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Stefano:

This is in regard to the draft Technical Specifications for the Perry Nuclear Power Plant, as distributed to the service list by letter dated January 30, 1985. First, the copy I received is missing pages 3/4 6-38 through 3/4 7-20.

Secondly, there appears to be a significant discrepancy between Tech Spec assumptions and FSAR commitments (and the Commission's regulations) for the standby liquid control system. Applicants have committed in their FSAR to parallel 2-pump operation of the SLCs, giving a flow rate of 86 gpm. This was approved by the Staff in Section 9.3.4 of SSER 3. 10 CFR 50.62 requires SLCs flow rate to be 86 gpm, which is accomplished by simultaneous operation of both pumps. However, Tech Spec 3.1.5 (p. 3/4 1-18) treats the 2 subsystems as redundant, allowing a subsystem to remain inoperable for 7 days before shutting down the reactor. The bases section, 3/4.1.5, p. B3/4 1-4, is again inconsistent with the design in that it refers to redundant pumps and a 41.2 gpm pumping rate, characteristic of one pump.

It thus seems that the draft must be revised to comply with the requirements of 10 CFR 50.62 and Applicants' FSAR commitments by requiring BOTH SLC subsystems to be operable at all times. TS 3. should be revised to

If one (or both) subsystem is inoperable, both subsystems must be restored to OPERABLE status within 8 hours or be in at least HOT SHUTDOWN within the next 12 hours.

The bases section should be likewise revised to correspond to the parallel 2-pump, 86 gpm PNPP design.

Sincerely,

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