



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN  
VICE PRESIDENT  
NUCLEAR

February 13, 1985  
PY-CEI/NRR-0189 L

Mr. B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Perry Nuclear Power Plant, Units 1 & 2  
Dockets Nos. 50-440; 50-441  
Shared System Technical Specification

Dear Mr. Youngblood:

This letter provides information to address the SER requirement in Section 7.3.2.4 (p. 7-19, attached) for a Technical Specification related to shared systems.

All safety related systems required to support Unit 1 have been evaluated, and are currently in the Unit 1 Technical Specifications. There is no need for a specific individual Technical Specification on the Unit 2 equipment, as they are included in the Unit 1 Technical Specifications.

We believe that this information is responsive to staff concerns, and request that the SER be changed to delete the requirement for a Technical Specification on shared systems.

Very truly yours,

Murray R. Edelman  
Vice President  
Nuclear Group

MRE:njc

cc: Jay Silberg, Esq.  
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high containment pressure signal (1-out-of-2 logic) and a high drywell pressure signal (1-out-of-2 logic). An additional delay of 90 seconds is imposed on loop B initiation with the same signals being present. Loop A is activated from Division 1 logic and loop B is activated from Division 2 logic.

The staff finds that the design of the automatic initiation circuitry is consistent with the staff position stated in the SER-CP, and is, therefore, acceptable.

#### 7.3.2.4 Systems Shared by Units 1 and 2

During the staff review of the ESF instrumentation and controls, it was noted that several systems are shared by Units 1 and 2. For example, although each unit has its own emergency closed cooling water system (ECCWS), the control complex chiller (used in the common control complex HVAC) is cooled only by the Unit 1 ECCWS. Likewise, the fuel pool heat exchangers are cooled only by the Unit 2 ECCWS. As a consequence, each ECCWS and the emergency service water system must share the LOCA initiation signals from both units.

GDC 5 states that structures, systems, and components important to safety shall not be shared among nuclear power units unless it can be shown that such sharing will not significantly impair their ability to perform their safety functions, including, in the event of an accident in one unit, an orderly shutdown and cooldown of the remaining unit. Accordingly, the applicant was asked to identify all systems shared by Units 1 and 2 and to discuss the design criteria used for the instrumentation and controls in the shared systems.

In response, the applicant has identified 11 shared safety-related systems. The power supply source and the location of the controls and indicators for each shared system have also been identified. In addition, the applicant performed a detailed walk-through of the ECCWS drawings for the staff illustrating how the LOCA signals from each unit are routed and joined together into a combined LOCA signal. The design criteria used for the shared systems' instrumentation and controls were also discussed with the applicant. The staff concludes that the design of the instrumentation and controls shared by both units satisfy GDC 5 and, therefore, is acceptable because the sharing of these systems will not impair their ability to perform safety functions.

The applicant has committed to formally submit for staff review the design criteria used for the instrumentation and controls in the shared systems. The applicant is to document, as a Perry Technical Specification, provisions to ensure that equipment associated with one unit that may be shut down will be available, if required, for the safe operation of the second unit. This is acceptable to the staff as a confirmatory item.

#### 7.3.2.5 IE Bulletin 80-06, "Engineered Safety Features Reset Control" (LRG-II Generic Issue 4-ICSB)

The staff asked the applicant to review schematic level drawings for all systems serving safety-related functions to determine whether or not, upon reset of an engineered safety features actuation signal (ESFAS), the safety-related equipment remains in its emergency mode and to propose corrective action for those equipment items which do not. Additionally, the applicant was asked to verify by testing, that all equipment remain in the