



**CENTERIOR
ENERGY**

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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
Technical Specification Change
Request: Revising the Radioactive
Effluent Release Report Submittal
Frequency from Semiannual to Annual

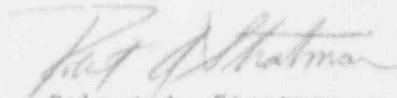
Gentlemen:

Enclosed is a request for amendment to the Perry Nuclear Power Plant (PNPP)
Unit 1 Facility Operating License NPF-58.

This License Amendment Application proposes an administrative amendment of the
PNPP Technical Specifications to incorporate the recent changes to 10 CFR
50.36a, involving the change in submittal frequency (from semiannual to
annual) for the formerly titled "Semiannual Radioactive Effluent Release
Report." This change has been determined not likely to involve significant
hazards considerations in accordance with the previously published Commission
guidance (51 FR 7751, March 6, 1986). Attachment 1 provides a Summary, Safety
Assessment, and the Significant Hazards and Environmental Considerations
for the proposed change. Attachment 2 provides a copy of the marked-up
Technical Specification pages.

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

Sincerely,


Robert A. Stratman

RAS:RAL:ss

Attachments

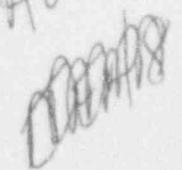
cc: NRC Project Manager
NRC Resident Inspector Office
NRC Region III
State of Ohio

Operating Companies
Cleveland Electric Illuminating
Toledo, Edison

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ADD: NRC/DOE/PRPB

ADD 1
L.A. Encl. 1/1


SUMMARY

In response to several Presidential memoranda on reducing the burden of government regulation, the Commission directed its Committee to Review Generic Requirements (CRGR) to review the existing NRC regulations to determine whether regulatory burdens could be reduced without in any way reducing the protection for the public health and safety and the common defense and security. One change to the regulations, which was approved, involved changing the submittal frequency of the "Semiannual Radioactive Effluent Release Report" from semiannually to annually as promulgated in 10 CFR 50.36a, "Technical Specifications on Effluents from Nuclear Power Reactors." Since this report and its submittal requirements are described in detail in Specification 6.9.1.7 and the report is referenced by name in many places throughout the Specifications, a Technical Specification amendment is required to implement this new annual submittal frequency.

SAFETY ASSESSMENT

Description Of The Proposed Change

The proposed change revises the PNPP Technical Specifications by changing those Specifications involving the Semiannual Radioactive Effluent Release Report, in order to be consistent with the newly revised requirements of 10 CFR 50.36a concerning submittal frequency. Refer to Attachment 2 for a marked-up copy of the subject Technical Specification pages.

The following Technical Specification changes are required:

- a. Revise the submittal frequency stated in the first paragraph of Specification 6.9.1.7 (on page 6-19) to require that an Annual Radioactive Effluent Release Report covering operation of the unit during the previous calendar year be submitted. A sentence is added which is taken directly from the revised regulation as to the allowed interval between reports. A sentence that had been included to clarify what time period was to be covered in the first report submitted for the first year of operation is deleted by this change request, since it is no longer necessary.
- b. Within the second and third paragraphs on page 6-20, information is listed that was only required to be included in the Semiannual Radioactive Effluent Release Report that was submitted in the spring of each year. Since only one report (annual) is now required, this information will be included in every report. Therefore, there is no longer a need to identify which report contains this information, and changes to these two paragraphs are made to delete specific references to the spring report. Several other editorial corrections are made to enhance readability.
- c. Throughout Specification 6.9.1.7 and various other specifications, this report is currently referred to by name as the "Semiannual Radioactive Effluent Release Report." References to this report within Specification 6.9.1.7 and the other specifications listed below should now be revised to refer to the "Annual Radioactive Effluent Release Report."

<u>Page</u>	<u>Specification or Table and Note</u>
3/4 3-84	Specification 3.3.7.9 Action b.
3/4 3-89	Specification 3.3.7.10 Action b.
3/4 11-4	Table 4.11.1.1.1-1 Note d.
3/4 11-7	Specification 3.11.1.4 Action a.
3/4 11-11	Table 4.11.2.1.2-1 Note e.
3/4 12-1	Specification 3.12.1 Action c.
3/4 12-7	Table 3.12.1-1 Note (1).
3/4 12-13	Specification 3.12.2 Actions a and b.
6-19	Specification 6.9.1.7 - Title.
6-20	Specification 6.9.1.7 - Title.
6-20	Specification 6.9.1.7 - First Paragraph.
6-20	Specification 6.9.1.7 - Second Paragraph.
6-20	Specification 6.9.1.7 - Third Paragraph.
6-20	Specification 6.9.1.7 - Fourth Paragraph.
6-20	Specification 6.9.1.7 - Note*.
6-21	Specification 6.9.1.7 - Title.
6-21	Specification 6.9.1.7 - First Paragraph.
6-21	Specification 6.9.1.7 - Second Paragraph.
6-24	Specification 6.13.2.1
6-25	Specification 6.14.2.i
6-25	Specification 6.15.1.1
xxvi	Index: Specification 6.9.1 - Change Title of the Semiannual Radioactive Effluent Release Report.

Justification For The Proposed Change

This administrative amendment would revise the Technical Specifications by changing those specifications involving the Semiannual Radioactive Effluent Release Report, in order to be consistent with the submittal frequency requirements of 10 CFR 50.36a, effective October 1, 1992, (57 FR 39353, August 31, 1992). The proposed change is purely administrative in that it removes inconsistencies between the present PNPP Technical Specifications and 10 CFR 50.36a following passage of the changes to this rule. The proposed change simply allows for the incorporation of the changes that were codified by the 10 CFR 50.36a rulemaking. Being administrative in nature, the proposed changes have no impact on plant equipment or methods of operation. This change has been determined not likely to involve significant hazards considerations in accordance with previously published Commission guidance (51 FR 7751, March 6, 1986).

SIGNIFICANT HAZARDS CONSIDERATION

The standards used to arrive at a determination that a request for amendment involves no significant hazards considerations are included in the Commission's Regulations, 10 CFR 50.92, which state that the operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any previously evaluated, or (3) involve a significant reduction in a margin of safety.

The proposed amendment has been reviewed with respect to these three factors and it has been determined that the proposed change does not involve a significant hazard because:

- (1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed change is designed to conform the PNPP Unit 1 Technical Specifications to changes in the NRC regulations (in this case 10 CFR 50.36a). The proposed change results in no changes to plant systems. The proposed change has no effect on accident conditions or assumptions. The proposed change does not affect possible initiating events for accidents previously evaluated, or any system functional requirements. As described within the discussion of the final rule, the eight proposed actions (one of which involves the frequency of radiological effluent reports) ... "will not reduce the protection of the public health and safety or the common defense and security." Hence, the proposed change is purely administrative in that it is designed to remove inconsistencies between PNPP Unit 1 Technical Specifications and 10 CFR 50.36a and does not affect plant operation in any way. Therefore, the proposed change to the subject Specifications cannot increase the probability or consequences of an accident previously evaluated.

- (2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

As stated above, the proposed change is administrative in nature and does not increase the possibility of any new or different kind of accident. The proposed change does not create the possibility of a new or different kind of accident since it does not affect the reactor coolant pressure boundary or any other plant systems or structures nor does it affect any system functional requirements or operability requirements and hence could not initiate any new or different kind of accident. Consequently, no new failure modes are introduced as a result of the proposed change.

- (3) The proposed change does not result in a significant reduction in the margin of safety.

The change does not involve a significant reduction in the margin of safety because it is administrative in nature, and does not affect any USAR design bases, accident assumptions, or Technical Specification Bases. Therefore, the proposed change does not reduce the margin of safety as defined in the basis for any Technical Specification.

Based upon the above considerations, it has been concluded that the proposed change does not involve significant hazards considerations.

ENVIRONMENTAL CONSIDERATION

The NRC determined that the final regulation (part of which involves changing the frequency of radiological effluent report) is the type of action described in categorical exclusions to 10 CFR 51.22(c)(2) and (3). As shown above, the proposed change does not involve a significant hazards consideration, nor does it increase the types and amounts of effluents that may be released offsite, nor does it increase individual or cumulative occupational radiation exposures. Based on the foregoing, it has been concluded that the proposed Technical Specification change meets the criteria given in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.