FEB 0 7 1986

Docket Nos.: 50-440/441

DISTRUBUTION
Docket File
NRC PDR
Local PDR
PRC System
PD#4 Reading
MRushbrook
WButler
OELD
EJordan

BGrimes

JPartlow.

JStefano ACRS (10)

Mr. Murray R. Edelman Vice President - Nuclear Group The Cleveland Electric Illuminating Company P.O. Box 5000 Cleveland, Ohio 44101

Dear Mr. Edelman:

SUBJECT: CHANGES TO FSAR CHAPTER 14 INCORPORATED BY FSAR

AMENDMENTS 21 THUR 24 - PERRY NUCLEAR POWER PLANT (UNITS 1 & 2)

Enclosed for your immediate attention and action are NRC staff comments pertaining to the subject FSAR changes. Since the enclosed comments involve plant startup test abstracts documented in FSAR Chapter 14, it is essential that any required test abstract changes be made prior to Perry Unit 1 initial criticality.

Your letter attesting to the accuracy of the FSAR for Perry Unit 1 licensing may be used to address your commitment to make the required FSAR changes; however, if time permits, it would be preferable that an FSAR amendment, documenting changes relative to the enclosed comments, be docketed prior to issuance of the low power operating license for Perry Unit 1.

To minimize any impact on licensing, an advance copy of the enclosed comments was provided to your staff. Should there be any questions or need to consult with the NRC staff, please contact the Perry Project Manager, John J. Stefano.

Sincerely,

Walter R. Butler, Director BWR Project Directorate No. 4 Division of BWR Licensing

Enclosure: As stated

cc: See next page

bcc w/enclosure: G. Lainas

R. Becker

C. Woodhead, OELD

PD#4/PM JStefano:dh 04/6/86

PD#4/D WRButler 02/ (/86

8603030522 860207 PDR ADOCK 05000440 A PDR Docket Nos.: 50-440/441

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## UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

FEB 0 7 1986

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Enclosure: As stated

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Mr. Murray R. Edelman The Cleveland Electric Illuminating Company

cc: Jay Silberg, Esq. Shaw, Pittman, & Trowbridge 1800 M Street, N. W. Washington, D. C. 20006

Donald H. Hauser, Esq. The Cleveland Electric Illuminating Company P. O. Box 5000 Cleveland, Ohio 44101

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Regional Administrator, Region III U. S. Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, Illinois 60137

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John G. Cardinal, Esq. Prosecuting Attorney Ashtabula County Courthouse Jefferson, Ohio 44047 Perry Nuclear Power Plant Units 1 and 2

Mr. Larry O. Beck
The Cleveland Electric
Illuminating Company
P. O. Box 97 E-210
Ferry, Ohio 44081

## STAFF POSITIONS AND REQUEST FOR ADDITIONAL INFORMATION PERRY NUCLEAR POWER STATION, UNIT 1 AND 2

- 14A The following startup test abstracts should specify the criteria to be used by Gilbert Associates, Inc. or the vendor to determine appropriate acceptance criteria or reference appropriate design specifications.
  - (1) FSAR Subsection 14.2.12.2.37 (Test Number 100 Integrated HVAC)
  - (2) FSAR Subsection 14.2.12.2.39 (Test Number 114 Emergency Closed Cooling System)
  - (3) FSAR Subsection 14.2.12.2.42 (Test Number 117 Emergency Service Water)
- 14B The responses to the following questions should be revised as the referenced abstracts are no longer appropriate.
  - (1) 640.17
  - (2) 640.18
  - (3) 640.19
  - (4) 640.38
  - (5) 640.39
  - (6) 640.49
  - (7) 640.41
  - (8) 644.42
  - (9) 640.44
  - (10) 640.45
  - (11) 640.50
- 14C The response to Question 643.58 should reference Question 643.65 as the questions are identical.
- 14D Clarification or technical justification should be provided for the -2 percent deviation from rated power allowance in FSAR Subsection 14.2.12.2.10 (Test Number 12-APRM calibration), Acceptance Criteria for Level 2.
- The response to Question 640.17 and FSAR Table 1.8-1 should be revised to indicate and to provide technical justification for the specific items of Regulatory Guide 1.68.1 for which you do not intend to comply. Additionally, FSAR Subsection 14.2.12.2.47 (Test Number 122-BOP Piping Expansion and Vibration) should be revised to reinstate the specific acceptance criteria and the systems to which they apply.