



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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PERRY NUCLEAR POWER PLANT

Al Kaplan
VICE PRESIDENT
NUCLEAR GROUP

April 3, 1988
PY-CEI/NRR-0823 L

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

Perry Nuclear Power Plant
Docket No. 50-440
Technical Specification
Change Request: Administrative
Controls and Definitions

Gentlemen:

The Cleveland Electric Illuminating Company (CEI) hereby requests amendment of Facility Operating License NPF-58 for the Perry Nuclear Power Plant, Unit 1. In accordance with the requirements of 10 CFR 170.12 a check in the amount of \$150.00 is enclosed. In accordance with the requirements of 10 CFR 50.91(b)(1), a copy of this request for amendment has been sent to the State of Ohio as indicated below.

This amendment requests miscellaneous administrative changes to the Technical Specifications, including revisions to the Administrative Controls section, wording clarifications in Sections 1.0 and 6.8.4.a, correction of typographical errors in sections 4.7.7.1 and 4.8.1.1.2.e.2, and deletion of several footnotes that are no longer applicable. It also includes the deletion of the Organization Charts per the guidelines given in Generic Letter 83-06.

Attachment 1 provides the Summary, Significant Hazards and Environmental Impact Considerations. Attachment 2 is a copy of the marked up Technical Specification pages.

Should you have any questions, please call.

Very truly yours,

Al Kaplan
Vice President
Nuclear Group

AK:cab
Attachments
cc: K. Connaughton
T. Colburn
J. Harris (State of Ohio)
U.S. NRC Region III

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Summary/Safety Analysis

On December 28, 1987 CEI submitted a letter PY-CEI/NRR-0761 L indicating that various Organizational titles had changed, and that the Technical Specifications would be revised during a subsequent Technical Specification change. The major portion of this change request is modifying Section 6 titles to come into conformance with the present organizational titles. No reduction in review or approval responsibilities have been requested via these title changes.

Numerous other administrative changes are also being requested. A brief description of each change is presented in Enclosure (1). An analysis of each general type is given below.

The Definition on page 1-7 and in section 6.6.1.a is being revised to clarify the definition of REPORTABLE EVENT making it consistent with the requirements of Generic Letter 83-43 dated December 19, 1983.

Technical Specification Surveillance Requirement 4.6.1.2.f is being revised to delete the footnote accompanying this surveillance requirement. The footnote was added in Amendment 5 to defer testing on MSIV's 1B21-F022A and 1B21-F028A. The exception expired on July 12, 1987, and is no longer applicable.

Technical Specification 3.7.3 is being modified to delete footnotes added in Amendment 1 and 4. These footnotes permitted continued operation with the automatic opening function of the RCIC injection valve disabled under certain plant conditions. The footnotes are no longer applicable, and are therefore being deleted.

A typographical error in Technical Specification surveillance requirement 4.7.7.1.b.1 is being corrected. The surveillance requirements apply to Fuel Handling Building subsystems; this is correctly reflected throughout 4.7.7.1 except for a single reference which states "system" rather than "subsystem".

Two more typographical errors are being corrected in Technical Specification surveillance requirement 4.8.1.1.2.e.2. First the load corresponding to one RHR pump for Division 1 is being corrected from 725 kw to 729 kw. The other correction is to the load corresponding to the HPCS pump on the Division 3 diesel generator. It is being changed from 2200 kw to 2400 kw. Surveillance Test data taken per 4.8.1.1.2.e verifies that the diesel generators have met the proposed requirements for 4.8.1.1.2.e.2 with the corrected loading values.

The sixth proposed change is a deletion of the organizational charts (Figure 6.2.1-1 and 6.2.2-1), and the addition of statements in Sections 6.2.1 to compensate for the organization chart deletions. These changes meet all the guidance set forth in Generic Letter 88-06. The Generic Letter noted that proposed license amendments conforming to the guidance in the Letter will be reviewed and approved without need for a detailed review.

The next change is to delete the exception to Section 6.3.1 for the Senior Operations Coordinator. The person presently filling this position meets the minimum qualifications of ANSI 18.1-1971 for comparable positions so this exception is no longer required.

Technical Specification 6.5.1.2, 6.5.1.3, and 6.5.1.5 have been revised as follows:

- a) The PORC membership is being changed, for the following reasons:
 - 1) The General Manager, Perry Plant Operations Department (PPOD) and the Director, Perry Plant Technical Department (PPTD) are being removed as PORC members/chairman/vice-chairman. The function of PORC is to advise the General Manager, (PPOD) and the Director, (PPTD). It is felt that this role can better be performed if these two positions are not also major contributors to PORC itself.
 - 2) The Technical Superintendent PPTD has been assigned as the PORC Chairman, replacing the General Manager, PPOD.
 - 3) The Manager, Operations Section has been elevated to Vice Chairman/member. This is to give some flexibility so that PORC meetings can occur in the absence of the Technical Superintendent, PPTD.
 - 4) The Principal Nuclear Operations Engineer is being removed as a Vice Chairman/member. The Principal Nuclear Operations Engineer is presently functioning as the NSRC Chairman. It is felt that it is inappropriate for the same person to act as PORC Vice Chairman, and NSRC Chairman.
 - 5) The Manager, Outage Planning Section is being removed. The remaining PORC members have an adequate knowledge of the various aspects of Nuclear Power Plant operations and therefore this position is not required.
- b) Due to the deletion of the various titles above, the definition of QUORUM in 6.5.1.5 is being changed to require the Chairman or his designated alternate and at least four members including alternates. Since the Quorum has been reduced, the number of Alternates permitted by 6.5.1.3 has been reduced to no more than 2. This will maintain the present condition that there is always at least a majority at each PORC meeting who are permanent PORC members.
- c) Changes are being made to Technical Specifications 6.5.1.6.h, 6.5.1.6.i, 6.5.1.6n and 6.5.3.1.f to make these sections consistent with the Technical Specification required responsibilities of the NSRC described in Technical Specification section 6.5.2.7.

The next change moved the requirements for approval of temporary procedure changes from Technical Specification section 6.5.3.1a into a new section 6.8.3. This is to improve the readability of Section 6.5.3.1a, and also results in making the Technical Specifications more consistent with Standard Technical Specifications. Based on this new addition the old section 6.8.3 has been renumbered as 6.8.4.

The final change is a clarification to the systems addressed in Technical Specification 6.8.4.a. the "CS" is being deleted and the words "the hydrogen analyzer portion of Combustible Gas Control" is being added. This is to clarify what "CS" meant. This is consistent with the present wording in the FSAR Appendix 1A Item III.D.1.1, and the wording in Supplement 8 to the Perry Nuclear Power Plant Safety Evaluation Report Section 11.5.

None of the above changes would result in a reduction in safety. They are administrative in nature, and with the exception of the reorganization of the PORC membership, are not significant. The PORC reorganization will create a truly advisory review committee, to review safety issues and report their recommendations to the General Manager, PPOD and Director, PPTD. CEI feels this will increase overall plant safety by having the PORC and the General Manager PPOD/Director PPTD independently review and conclude on safety issues.

Significant Hazards Analysis

The standards used to arrive at a determination that a request for amendment requires no significant hazards consideration 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 accident previously evaluated, or (3) involve a significant reduction in a margin of safety. CEI has reviewed the proposed change with respect to these three factors.

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

The proposed changes as described above are administrative and as such can not involve a significant increase in the probability or consequence of an accident previously evaluated. The only non-administrative change is the reorganization of the PORC membership. The function of PORC remains the same; to advise the General Manager, PPOD and Director, PPTD on matters relating to safety. By creating a PORC independent from the General Manager, PPOD/Director, PPTD, the Committee's ability to carry out its function should be enhanced. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes does not create the possibility of a new or different kind of accident.

As stated above, most of the proposed changes are administrative changes which do not create the possibility of any new accident. The proposed changes to PORC memberships also can not create the possibility of a new or different kind of accident since the overall function of PORC remains the same.

The proposed change does not involve a significant reduction in the margin of safety.

The majority of these changes are administrative in nature, and as such involve no reduction in the margin of safety. The reorganization of PORC membership should enhance safety by creating a truly independent safety review committee to advise the plant management. Thus, there is not a significant reduction in the margin of safety.

Therefore, CEI has concluded that this proposed amendment involves no significant hazards considerations.

Environmental Impact

The Cleveland Electric Illuminating Company has reviewed the proposed Technical Specification change against the criteria of 10 CFR 51.22 for environmental considerations. As shown above, the proposed change does not involve a significant hazards consideration, nor increase the types and amount of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, CEI concludes 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.

<u>TECHNICAL SPECIFICATION PAGE</u>	<u>CHANGE</u>	<u>REASON</u>
1-7	Delete reference to 10 CFR 50.72	Make Specifications consistent with Generic Letter 83-43
3/4 6-5	Delete ** from 4.6.1.2.f and delete footnote ** at bottom of the page	This footnote expired July 12, 1987
3/4 7-6	Deletion of # sign and accompanying footnote	Footnote no longer applicable
3/4 7-6a	Deletion of entire page	Note no longer applicable
3/4 7-17	Change surveillance requirement 4.7.7.1.b.1 wording from system to to subsystem	To correct designation and make it consistent with rest of the LCO 3.7.7.1/4.7.7.1
3/4 8-5	Change surveillance requirement 4.8.1.1.2.e.2 from 725 kw to 729 kw	Correct typographical error
3/4 8-6	Change surveillance 4.8.1.1.2.e.2 from 2200 kw to 2400 kw	Correct typographical error
6-1	Change Manager to General Manager	Title Change
	Delete references in 6.2.1 and 6.2.2 to organization charts (Figures 6.2.1-1 and 6.2.2-1) Add 6.2.1a,b,c and d statements	To comply with Generic letter 88-06 guidance for deletion of organization charts
6-3	Delete figure 6.2.1-1	To incorporate guidance of Generic Letter 88-06
6-4 and 6-5	Delete figure 6.2.2-1	To incorporate guidance of Generic Letter 88-06.
6-7	Section 6.2.3.1 changed Manager to Director	Title change
	Section 6.2.3.4 changed Manager to Director	Title change

TECHNICAL SPECIFICATION PAGE

CHANGE

REASON

	Deleted the exception for the Senior Operations Coordinator to meet the minimum qualifications of ANSI N18.1-1971 for first cycle.	Person holding job meets qualifications
6-8	Section 6.4.1 changed General Supervisor to Manager	Title change
	Section 6.5.1.1 changed Managers to General Manager PPOD and Director PPTD	Title change
	Section 6.5.1.2 changed PORC composition by	
	a) Deleting General Manager PPOD/Director PPTD, Principal Nuclear Engineer and Manager Outage Planning	To make PORC independent from NSRC and from General Manager/Director
	b) Establishing Technical Superintendent as Chairman	Needed Chairman
	c) Establishing Manager, Operations Section as Vice-Chairman/member	Alternate Chairman
	d) Changing titles from General Supervisor/General Supervising Engineer to Manager	Title change
	Section 6.5.1.3 changed number of alternates from 3 to 2	Reduction in PORC membership requires similar reduction in Alternates
6-9	Section 6.5.1.5 reduced Quorum from six to four (plus the Chairman)	Reduction in PORC membership requires similar reduction in Quorum

TECHNICAL SPECIFICATION PAGE

CHANGE

REASON

	Section 6.5.1.6h, i, & j deleted requirement to send these changes to NSRC	There is no accompanying requirement for NSRC to review these changes
	Section 6.5.1.6k changed Manager to General Manager/ Director	Title changes
6-10	Section 6.5.1.7a changed Managers to General Manager/ Director	Title changes
	Section 6.5.1.7c changed Manager to General Manager	Title change
6-14	Section 6.5.3.1a: a) Changed Managers to "both the General Manager PPOD and the Director PPTD" b) Deleted last 4 sentences of paragraph	Title changes Moved these requirements into a new Section 6.8.3
	Section 6.5.3.1b changed Manager NED to Director NED and changed managers IPD to "both the General Manager PPOD/Director PPTD"	Title change
	Section 6.5.3.1c changed Managers PPD to "both the General Manager PPOD/ Director PPTD"	Title change
6-15	Section 6.5.3.1d changed appropriate Manager PPD to "General Manager PPOD or the Director PPTD as appropriate"	Title change
	Section 6.5.3.1f: (a) Changed Manager to Director in line 4 and 6	Title change

TECHNICAL SPECIFICATION PAGE

CHANGE

REASON

6-16

(b) Deleted "and 6.5.2.7" on line 6.

There is no accompanying Technical Specification requirement in section 6.5.2.7 for NSRC to review these changes

(c) Added General Manager, Perry Plant Operations Department to line 6.

Add additional Technical Specification requirement to have General Manager, PPOD approve Security Plan and Emergency Plan

Section 6.6.1a delete "pursuant to the requirements of Section 50.72 to 10 CFR Part 50"

To clarify requirements and make them consistent with Generic Letter 83-43

Section 6.8.2 changed Managers PPD to "General Manager PPOD and the Director, PPTD

Title change

Inserted new section 6.8.3 dealing with Temporary changes that was deleted from Section 6.5.3.1a. No change was made to the wording.

Reorganized section to make it conform more closely with standard Technical Specifications

Renumbered old 6.8.3 to 6.8.4

Due to inserting of new 6.8.3

6.8.4a deleted "CS" and added "the hydrogen analyzer portion of Combustible Gas Control"

This is to clarify what "CS" meant as identified in FSAR Appendix 1A Item III.D.1.1 and SER Supplement 8 Section 11.5