



*Perry Nuclear Power Plant
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440-280-5382

June 2, 2020
L-20-154

10 CFR 50.55a

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT:

Perry Nuclear Power Plant
Docket No. 50-440, License No. NPF-58
Response to Request for Additional Information for Proposed Alternative to American Society of Mechanical Engineers Boiler and Pressure Vessel Code IR-054, Revision 2 (EPID L-2020-LLR-0003)

By letter dated January 6, 2020 (Agencywide Documents Access and Management System (ADAMS), Accession No. ML20006D984), Nuclear Regulatory Commission (NRC) approval was requested for proposed alternatives to the American Society of Mechanical Engineers, Boiler and Pressure Vessel Code, for the fourth 10-year inservice inspection program for the Perry Nuclear Power Plant.

By electronic mail dated May 6, 2020, the NRC requested additional information to complete its review of Proposed Alternative Request No. IR-054, Revision 2. Energy Harbor Nuclear Corp. response to this request is attached.

There are no regulatory commitments contained in this submittal. If there are any questions or if additional information is required, please contact Mr. Thomas A. Lentz, Manager – Nuclear Licensing and Regulatory Affairs, at (330) 315-6810.

Sincerely,

Payne, Frank C63958
Payne, Frank C63958 Jun 2 2020 7:18 AM

DocuSign

Frank R. Payne

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Attachment:
Response to Request for Additional Information

cc: NRC Region III Administrator
NRC Resident Inspector
NRC Project Manager

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By electronic mail dated May 6, 2020, the Nuclear Regulatory Commission (NRC) staff requested additional information to complete its review of Proposed Alternative Request No. IR-054, Revision 2. The response for the Perry Nuclear Power Plant (PNPP) is provided below. The NRC staff request is presented in bold type, followed by PNPP's response.

RAI-NVIB-01 (IR-054)

During plant operations, the static and cyclical loads on the N7 and N8 nozzles could be assumed to be different. Provide justification for considering the N7 nozzle equivalent to the N8 nozzle for inspection purposes; or that environmental and loading conditions for the nozzle to be inspected are bounding for the other nozzle.

The PNPP BWR-6 reactor design utilizes a top head that includes two nozzles; the N8 head spray nozzle and the N7 spare nozzle. The N8 nozzle has piping attached to it and is utilized during plant operation. The N7 nozzle is a spare and has a bolted blank cover. The nozzles are alike regarding geometry and materials.

Although the BWR-6 Vessel Stress Report for PNPP does not postulate static and cyclical loads for the spare N7 nozzle, the report states that if the spare N7 nozzle is ever used, the nozzle would be subjected to loading conditions equal or less severe than N8 nozzle loading. Therefore, the N7 nozzle is bounded by the N8 nozzle loading conditions even though the N7 nozzle is not subjected to those conditions in its current configuration.

For the fourth inservice inspection (ISI) interval, the N8 nozzle is scheduled for examination during the spring 2023 refueling outage, which is the only required inspection for the N7/N8 nozzle group during the interval ending 2029.