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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

March 10, 1986
PY-CEI/NRR-0427 L



Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Perry Nuclear Power Plant
Docket Nos. 50-440;
Technical Specification Certification

Dear Mr. Denton:

In your letter dated November 19, 1985, transmitting the Final Draft Perry Unit 1 Technical Specifications, you requested that CEI certify that the document is consistent with the Final Safety Analysis Report (FSAR), the NRC Safety Evaluation Report (SER) and the as-built facility as a prerequisite for issuance of an operating license. CEI had long been aware this would be required, and had begun implementing programs to ensure that the resources and processes used would provide a detailed and comprehensive basis for certification. These programs are described in Attachment 1.

Further technical specification changes were identified in your letters dated November 29, 1985, December 30, 1985, and March 7, 1986. We have continued to work with the NRC staff during the latest review cycle to address their concerns and assure the latest as-built information was included in these technical specification changes. Examples of such changes resulting from the NRC technical staff review are the addition of neutron flux and containment isolation valve position indication instrumentation to the Accident Monitoring Instrumentation table in the technical specifications. Although these changes to the technical specifications have been included, they are not applicable prior to exceeding 5% power and we recognize the need for further discussion with the staff to resolve this issue. Another change resulted from additional information having been supplied to a staff reviewer followed by an on-site visit. The requirement for a routine high-pressure test of the drywell airlock has been deleted.

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Mr. H. R. Denton

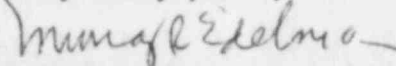
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In summary, based on all the programs described herein, the Perry Nuclear Power Plant Technical Specifications are consistent with the FSAR, SER and its supplements, and the as-built plant.

If you have any questions, please let me know.

Very truly yours,



Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

cc: Jay Silberg, Esq.
John Stefano (2)
J. Grobe
S. Brown, NRR

D. Eisenhut
R. Bernero
W. Houston
W. Butler

Technical Specification Review Programs

The Perry Technical Specifications were initially developed using the BWR/6 Standard Technical Specifications (NUREG-0123, proposed Rev. 4) and have been modified by Perry specific design values, FSAR information and preoperational test results. The Perry Technical Specifications have been updated to reflect modifications to plant design and are traceable to design documents. The Technical Specifications have undergone numerous extensive reviews by both CEI and the NRC, including two early draft reviews, the proof and review phase and two final draft reviews.

The Perry FSAR has undergone a verification review. This was performed by representatives of the utility, the architect/engineer, and the NSSS vendor. The purpose of this review was to ensure the information in the FSAR was accurate and traceable to design documents. To ensure consistency between the FSAR and Technical Specifications, a detailed review of the Technical Specifications against the FSAR and the SER was conducted in June 1985. Each individual Limiting Condition for Operation (LCO), action statement, surveillance requirement and bases section was reviewed against the FSAR descriptive material related to the specification under review. All apparent discrepancies were identified and resolved. The SER and its supplements were also reviewed for descriptive material related to the specification under review. Prior to the review, seven items identified in the SER as requiring technical specifications were requested to be revised in letters dated February 11, February 12, February 13 and February 19, 1985. The results of the SER review showed consistency with the Safety Evaluation Report through Supplement No. 9. The results of this total intensive review have been compiled in a matrix format to support our certification letter. Through an on-going process of plant walkdown, the conduct of preoperational tests which demonstrated the acceptance criteria of technical specifications, where practical, and our program of performing dry runs of surveillance requirements of the technical specifications, we have confirmed the technical specifications are consistent with the as-built facility.

During the week of November 18, 1985 a regional inspection team conducted an audit of the Perry Technical Specifications. The audit team reviewed the Technical Specifications against the FSAR and the as-built plant for selected systems (Reference Inspection Report 50-440/85082). During the review, an apparent discrepancy was identified. Our response was provided to NRC Region III by letter dated December 12, 1985. Although previously accomplished through the development of the FSAR/Technical Specifications matrix described above, an additional sample review of FSAR and Technical Specifications consistency was performed in response to the inspection. The values chosen were representative of the key input variables in the Containment Response Analysis (Chapter 6), the Accident Analyses (Chapter 15), and the Instrumentation and Controls Section (Chapter 7). The additional comparison of the Technical Specifications values and respective FSAR parameters has been completed and the results further demonstrate that the Perry Technical Specifications are consistent with or conservative with respect to the Perry FSAR.