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September 23, 1988
PY-CEI/OIE-0331 L

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

Perry Nuclear Power Plant
Docket No. 50-440
Updated Information to
Letter PY-CEI/OIE-0330 L

Dear Mr. Davis:

As requested by members of your staff this letter provides additional information regarding the commitments made in our letter PY-CEI/OIE-0330L, dated September 23, 1988.

Based on information provided to date, we plan to restart the plant on September 25, 1988. We understand that the NRC Senior Resident Inspector has the authority to grant permission for entry into Operational Condition 2 (Startup/Hot Standby) following satisfactory completion of items A, B, and C of the attachment and entry into Operational Condition 1 (Power Operation) following satisfactory completion of item D. If you have any questions, please feel free to call.

Very truly yours,

M. D. Kaplan for

Al Kaplan
Vice President
Nuclear Group

AK/sc
Attachment

cc: T. Colburn
K. Connaughtor
Document Coat ol Desk

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With respect to corrective actions described in our previous correspondence, PY-CEI/OIE-0330L dated September 23, 1988, the following clarifications are provided:

A. These items will be completed prior to plant startup:

1. (Previously item A6) The preheater inlet low point "Y" drain strainers and drain traps will be backflushed to ensure that they are free and clear of restrictions.

2. (Previously item A7) The drive flow instruments N64-N102A/B will be flushed and backfilled to ensure that they are free and clear of restrictions.

3. (Previously item A8) The 1N62-F170B valve which malfunctioned during the troubleshooting process was repaired. Repairs consisted of inspection and rebuilding of the solenoid operated valve (1N62-F171B) which controls air flow to the 1N62-F170B pneumatic operator. Functional testing demonstrated proper automatic opening and manual closure of the valve.

4. (Previously item A9) The intercondenser loop seal drain system will be modified into a passive system as follows:

   (a) The automatic isolation valve actuations on both the high and low level signals will be deleted.
   (b) The isolation valve actuation will be restricted to a local remote operated manual valve. This valve function will be administratively controlled, as necessary, to establish adequate loop seals during system startup.
   (c) The low level alarm switch tap will be lowered to eliminate the cycling of a nuisance alarm.

5. (Previously item A13) All other vacuum instrument lines attached to the main condenser will be blowndown with air.

6. (Previously item A14) The slight bows in both the "A" and "D" main condenser low vacuum instrument lines will be corrected.

B. These items will be completed prior to plant startup and made available to the NRC Senior Resident Inspector:

1. (Previously item A1) ARIs for N62 and N64 will be revised to reference the off normal instruction for loss of condenser vacuum (ONI-N62) ir order to achieve a power reduction consistent with the ability to maintain condenser vacuum.

2. (Previously item A2) SOIs for N62 and N64 will be revised to require drive flow to be established in order to preheat and dry out the offgas piping, specifically the recombiner, prior to introducing flow of non-condensables.

3. (Previously item A3) SOIs for N62 and N64 will be revised to provide valve sequencing as well as precautions as to the significance of system drainage.

4. (Previously item A4) ONI-N62 for loss of condenser vacuum will be revised to caution the operator to review all main condenser vacuum indicators during extended operations under degraded main condenser vacuum conditions, and to evaluate the need to vent the instruments found not tracking accurately.

5. (Previously item A10) The procedure for the integrated operational test of the Condenser Air Removal and Offgas System discussed in D. below.

C. Operator training described below and training to the procedure changes described in Items B1-B5 will be completed by each shift prior to resuming the watch with the plant in Operational Condition 1, 2, or 3:

1. (Previously item A5) Operator training will be conducted to provide guidance regarding local system manipulation in conjunction with control room actions and indications.

D. The following items will be completed during the upcoming plant startup:

1. (Previously item A11) As directed by a daily instruction, the main condenser vacuum transmitter indicators will be monitored to assure that all instruments are tracking properly.

2. (Previously item A10) Prior to entering Operational Condition 1 (Power Operation) an integrated operational test will be performed to demonstrate proper functioning of the Condenser Air Removal and Off-Gas Systems. This testing will include:

   (a) Operational test of both SJAEs including shifting between the A and B trains and verification of proper system drainage.
   (b) Verification of proper intercondenser level control.
   (c) Verification of proper operation of SJAE steam supply flow switch.

E. The following item will be completed prior to the next performance of the Channel Functional Test following plant startup:

1. (Previously item A12) On a monthly basis the pin vents on each main condenser transmitter required by Technical Specifications will be opened for a period of at least one minute. This will be done as part of the monthly channel functional testing and will continue until the first refueling outage.

F. The following items will be evaluated by the end of the first refueling outage and any necessary actions implemented:

1. (Previously item B1) Modifications to the drive steam flow instrumentation to provide a low flow alarm only at the existing setpoint. The isolation signal will be provided either at the minimum flow setpoint for SJAE performance or at minimum dilution flow.

2. (Previously item B2) An evaluation of the need for periodic backflush of instrument lines.

3. (Previously item B3) Design changes will be evaluated to improve reliability of the preheater inlet low point drain which may include, enlarging the size of the drain line, installing a drainpot, and/or installing remote (control room) manual operational capability.

4. (Previously item B4) Modifications to the intercondenser loop seal increasing the overall length to provide enhanced operating margin to prevent pressure perturbations from clearing the loop seal. Additionally, relocation of the new loop seal control switch to the control room for remote operation.

5. (Previously item B5) Evaluate the sealing capability of the SJAE condenser suction valves to minimize backflow through the offgas system.

6. (Previously item B6) Modifications to the main condenser low vacuum instrumentation sensing lines to increase pipe diameter and line slope.

7. Evaluate the need for preventive maintenance to replace/rebuild the solenoid control valves to the SJAE condenser suction isolation valves.