THE CLEVELAND ELECTRIC ILLUMINATING COMPANY
P.O. BOX 97 ■ PERRY, OHIO 44081 ■ TELEPHONE (216) 259-3737 ■ ADDRESS-10 CENTER ROAD
Serving The Best Location in the Nation
PERRY NUCLEAR POWER PLANT

Al Kaplan
VICE PRESIDENT
NUCLEAR GROUP

June 9, 1988
PY-CEI/NRR-0848 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 on Containment
Penetration Conductor Overcurrent
Protective Devices

Dear 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 revision of Technical Specification Table 3.8.4.1-1 to delete circuit breakers from the table that are not Containment Penetration Conductor Overcurrent Protection Devices (spare breakers) and to correct typographical errors in the table.

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

Should you have any questions, please feel free to call.

Very truly yours,

Al Kaplan
Vice President
Nuclear Group

AK:cab

Attachments

cc: K. Connaughton
T. Colburn
J. Harris (State of Ohio)

A001 1/1 w/check $150 #033817

Summary

The proposed amendment deletes numerous spare circuit breakers from Table 3.8.4.1-1. The breakers are not connected to any load inside or outside Containment, and as such they do not meet the criteria for being on the Technical Specification Table. Many of these circuit breakers were originally connected to motor operated valve (MOV) space heaters used during construction, which have since been disconnected. A total of seventeen breakers are being removed. The proposed change also corrects 3 typographical errors on the table. The first involves the circuit number which corresponds to the primary circuit breaker 1R25-S043-CB21. The table incorrectly lists the circuit as 1C41-B9XB. The correct circuit number is 1C41-B8XB. The other two errors are on the last entry on Technical Specification page 3/4 8-23. Presently the load circuit and primary circuit breaker listed are 1F42-B3X and 1R25-S097-CB3, respectively. However this circuit and breaker does not supply power through any containment penetration. The correct numbers should be 1F42-B4X and 1R25-S097-CB4. This circuit and breaker supplies power to the space heater for the fuel transfer equipment hydraulic supply panel in containment, and as such is a containment penetration conductor overcurrent protective device.

Safety Analysis

As stated above, this proposed change can be divided into two separate parts. First is the deletion of spare circuit breakers from the list. General Design Criterion 50 "Containment Design Basis" requires, in part, that the reactor containment structure, including penetrations, shall be designed so that the containment structure can accomodate, without exceeding the design leakage rate, the calculated pressure, temperature, and other environmental conditions resulting from any Loss-of-Coolant Accident. When a load is connected to a circuit passing through an electrical penetration, the potential exists for an electrical fault inside containment to result in a penetration seal failure, such that a breach of containment might occur. When such a potential exists, the associated penetrations are provided with protection devices, such as circuit breakers. There are seventeen spare circuit breakers presently in Table 3.8.4.1-1. These circuit breakers were left in the table during Technical Specification development, to permit future plant modifications using these circuit breakers without requiring a Technical Specification change. However, it is now felt that it is more beneficial to remove the spare circuit breakers from the table, thereby decreasing the amount of needless surveillance testing. It is also felt that the majority of future modifications that could use these circuit breakers would require additional Technical Specification changes, and therefore, adding the circuit breakers onto the Table at that time would not be a problem. There is no safety significance to removing spare circuit breakers from the table, since no load is connected to them.

The second part of the proposed change is correction of typographical errors on the table. The first typographical error is correcting the circuit number which corresponds to circuit breaker 1R25-S043-CB21. The actual circuit number corresponding to this breaker is 1C41-B8XB not 9XB. The second typographical error involves the last circuit and circuit breaker listed on page 3/4 8-23.

As discussed above the correct circuit is 1F42-B4X, and the correct circuit breaker is 1R25-S097-CB4. The circuit and circuit breaker supply power to a space heater in the fuel transfer hydraulic supply panel on the refuel floor in containment. As such this circuit does provide containment penetration overcurrent protection. The circuit breaker has not been energized during plant operations. It has been included in the surveillance test instructions required by Technical Specification 3.8.4.1. These surveillance tests will be performed prior to energizing the circuit that includes this breaker. Energization of this circuit and breaker will be required in order to utilize the fuel transfer equipment, in preparation for the upcoming first refueling outage. Testing of this equipment could begin as early as October of 1988. Following completion of this testing, the space heater circuit will continue to be energized during plant operations, contingent upon approval of this Amendment request. Until this proposed change is approved, the 1R25-S097-CB3 circuit breaker will also remain in the surveillance test instructions. As such there is no safety significance to this proposed change.

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.

As stated above, all of the proposed changes are to either delete spare circuit breakers from the table or to correct typographical errors on the table. As such there is no increase in the probability or consequences of an accident previously evaluated. Deleting spare circuit breakers can not increase the probability or consequences of any accident. since these breakers are not energized or connected to loads inside or outside of the containment. Correcting the typographical errors assures that the right circuits and circuit breakers are tested, and thus provides assurance of proper functioning of containment penetration overcurrent protection devices.

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

Removing spare circuit breakers from the table can not create a new or different kind of accident, since these breakers do not supply electrical power to any component. Correcting the typographical errors to make the circuits and circuit breakers correct can not create a new or different kind of accident. The circuits/components being energized have not changed. There is no new component or circuit being added to the table. Therefore no new or different kind of accident has been created by this proposed change.

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

The removal of the spare circuit breakers from the table does not change the margin of safety, since these breakers do not supply power to any components. Correcting the typographical errors on the table will not change the margin of safety since the purpose of the table is to list all the containment penetration conductor overcurrent protective devices. Correcting the typographical errors does this. Thus the change involves no 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 amounts 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.