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United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Perry Nuclear Power Plant
Docket No. 50-440
NRC Review of Revised Accident Source Term Submittals for Operating Plants

Ladies and Gentlemen:

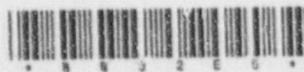
In a memorandum to the Commissioners dated September 9, 1997, the Nuclear Regulatory Commission (NRC) staff identified that they plan to defer reviews of the revised accident source term (RAST) at operating reactors until the technical reviews of the remaining advanced plant (AP600) are completed. This was based on certain task force members being involved in the final design approval for the AP600.

The consideration of significant additional resource expenditures could be halved if the NRC would avoid deferring operating plant reviews until after the advanced plant reviews, or could prioritize the reviews of the Perry Nuclear Power Plant (PNPP) RAST submittal to permit completion on a schedule that would support the start of the next PNPP refueling outage, currently scheduled to begin during the first week of April, 1999.

PNPP is one of the "pilot plants" that is seeking to apply the RAST insights in design-basis assessments. The docketed PNPP application (submitted August 27, 1996) is focused on the elimination of the Main Steam Isolation Valve Leakage Control System (MSIV-LCS) and the revision of the Main Steam Line leakage limits. One of the NRC Principles of Good Regulation is Efficiency, and it is noted therein that where several effective alternatives are available, the option which minimizes the use of resources should be adopted. Although another industry method exists for justifying elimination of MSIV-LCS and revising Main Steam Line leakage limits, which involves seismic walkdowns and design changes to qualify a piping pathway for leakage holdup in the main condenser, such an alternative is considerably more expensive and man-power intensive than the RAST method.

The announced schedule delay in the NRC pilot plant reviews noted in the September memorandum will result in the expenditure of additional PNPP resources to pursue the seismic qualification method in parallel with the RAST method. This is because NRC approval of MSIV-LCS elimination and revision of Main Steam Line leakage is considered very important to the success of the next refueling outage. Due to the pilot plant program and the possible future applications of RAST at PNPP, NRC approval of the docketed PNPP RAST calculations will be pursued regardless of whether it is the success path that completes first or not. Therefore, the

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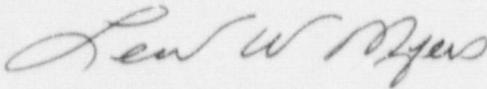
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parallel pursuit of seismic qualification would result in additional resource expenditures for the NRC as well.

The announced RAST review schedule, which places priority on advanced plant reviews, is not consistent with the needs of domestic utilities with operating plants. A meeting between NRC senior management and Nuclear Energy Institute (NEI) representatives is scheduled for December 18, 1997, which includes discussions on the NRC RAST review schedule. It is hoped that the discussions will be given appropriate consideration, so that the schedules for operating plants such as PNPP can be supported.

Actions discussed in this letter represent intended or planned actions, and are not regulatory commitments. If you have questions or require additional information, please contact Mr. Henry L. Hegrat, Manager - Regulatory Affairs, at (440) 280-5606.

Very truly yours,



cc: NRC Project Manager
NRC Resident Inspector
NRC Region III
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