



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

ATTACHMENT 1

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATING TO REQUEST FOR RELIEF

CLEVELAND ELECTRIC ILLUMINATING CO.

PERRY NUCLEAR POWER PLANT - UNIT 1

DOCKET NUMBER 50-440

5.2.5 Reactor Coolant Pressure Boundary Inservice Inspection and Testing

This section was prepared with the technical assistance of DOE contractors from the Idaho National Engineering Laboratory.

5.2.5.2 Evaluation of Compliance with 10 CFR 50.55a(g) for Perry Nuclear Power Plant, Unit 1

This evaluation supplements conclusions in the corresponding sections of NUREG-0887, Supplements 7 and 8, which addresses the definition of examination requirements and the evaluation of compliance with 10 CFR 50.55a(g). In a submittal dated June 3, 1985 (M. R. Edelman to B. J. Youngblood), the Applicant requested relief from ASME Code Section XI requirements that the Applicant determined to impractical. These relief requests were supported by information pursuant to 10 CFR 50.55a(a)(3). The staff's evaluation of this submittal was reported in Appendix Q of SSER 7.

In a letter dated November 13, 1985 (M. R. Edelman to B. J. Youngblood), the Applicant revised the previously submitted Relief Request #3 and submitted two additional relief requests (#21 and #22). The Applicant clarified the revised and new relief requests in a letter dated November 26, 1985 (M. R. Edelman to B. J. Youngblood). The staff evaluation of these revised and new relief requests was reported in Appendix Q, Amendment 1, of SSER 8.

Revisions to three of the previously submitted Class 1 relief requests were received for staff review in a July 11, 1986 submittal (M. R. Edelman to W. R. Butler). Relief Requests #1, #6, and #19 were revised to include additional welds. The evaluation of the July 11, 1986 submittal of revised relief requests is included in Amendment 2 of Appendix Q to this report.

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The staff evaluation consisted of reviewing these submittals and determining if relief from the Code requirements is justified. Pursuant to 10 CFR 50, paragraph 50.55a(a)(3), relief from the Code requirements has been allowed for those requirements that, if implemented, would result in hardships or unusual difficulties without a compensating increase in the level of quality and safety. On the basis of granting relief from these preservice examination requirements, the staff concludes that the Preservice Inspection Program for Unit 1 is in compliance with 10 CFR 50.55a(g)(3).

#### 6.6 Inservice Inspection of Class 2 and 3 Components

This section was prepared with the technical assistance of DOE contractors from the Idaho National Engineering Laboratory.

##### 6.6.3 Evaluation of Compliance with 10 CFR 50.55a(g) for Perry Nuclear Power Plant, Unit 1

This evaluation supplements conclusions in the corresponding sections of NUREG-0887, Supplements 7 and 8, which addresses the definition of examination requirements and the evaluation of compliance with 10 CFR 50.55a(g). In a submittal dated June 3, 1985 (M. R. Edelman to B. J. Youngblood), the Applicant requested relief from ASME Code Section XI requirements that the Applicant determined to impractical. These relief requests were supported by information pursuant to 10 CFR 50.55a(a)(3). The staff's evaluation of this submittal was reported in Appendix Q of SSER 7.

In a letter dated November 13, 1985 (M. R. Edelman to B. J. Youngblood), the Applicant revised the previously submitted Relief Request #3 and submitted two additional relief requests (#21 and #22). The Applicant clarified the revised and new relief requests in a letter dated November 26, 1985 (M. R. Edelman to B. J. Youngblood). The staff evaluation of these revised and new relief requests was reported in Appendix Q, Amendment 1, in SSER 8.

A revision to one of the previously submitted Class 2 relief requests was received for staff review in a July 11, 1986 submittal (M. R. Edelman to W. R. Butler). Relief Request #22 was revised to correct a misidentified item. The evaluation of the July 11, 1986 submittal of the revised relief request is included in Amendment 2 of Appendix Q to this report.

The staff evaluation consisted of reviewing these submittals and determining if relief from the Code requirements is justified. Pursuant to 10 CFR 50, paragraph 50.55a(a)(3), relief from the Code requirements has been allowed for those requirements that, if implemented, would result in hardships or unusual difficulties without a compensating increase in the level of quality and safety. On the basis of granting relief from these preservice examination requirements, the staff concludes that the Preservice Inspection Program for Unit 1 is in compliance with 10 CFR 50.55a(g)(3).