



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN  
SR. VICE PRESIDENT  
NUCLEAR

February 20, 1987  
PY-CEI/NRR-0595 L



Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington D.C. 20555

Perry Nuclear Power Plant  
Docket No. 50-440  
Emergency Technical Specification  
Change Request

Gentlemen:

Pursuant to 10 CFR 50.59, the Cleveland Electric Illuminating Company hereby requests amendment of Appendix A to the Perry Nuclear Power Plant operating license (NPF-58).

### Summary

During Reactor Core Isolation Cooling (RCIC) system testing, CEI experienced fluctuations on indicated level channels (see attached). CEI has determined that this anomaly occurs during RCIC system injection to the vessel at low reactor power. Therefore, CEI will place administrative controls on the injection of the RCIC system to the vessel. These controls include disabling the automatic operation of the injection valve, but leaving the capability for manual operation of the injection valve with adequate procedural cautions to allow operator discretion. Since this action would render the system inoperable, CEI proposes to add a footnote to Technical Specification 3.7.3 to modify the applicable conditions during which the RCIC system is required to be operable.

This modification in required operational conditions will ensure that the reactor water level instrumentation will remain operable during present operations. In that CEI has determined by analysis that the RCIC system is not required to perform its design basis at all conditions less than 75% of rated thermal power, and that the RCIC system shall be modified to preclude this anomaly prior to reaching that power level, this proposed change is in the best interest of the company and will not result in any increased risk to the health and safety of the public.

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### 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 50.91, 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. Consistent with the design basis for the RCIC system, the most limiting transient with the RCIC system inoperable is the loss of feedwater transient. CEI has performed a conservative analysis to determine that this system is not required to mitigate the consequences of any accident or transient at reactor powers less than 75% of rated thermal power (see attached). This conservative analysis utilized decay heat generated in accordance with 10 CFR 50 Appendix K and only took credit for reduced power. This analysis resulted in Peak Clad Temperatures (PCTs) much lower than allowed under Appendix K. Since the proposed change would require the RCIC system to be operable above this thermal power, CEI has concluded that this proposed change involves no significant increase in the probability or consequences of an accident previously evaluated.

CEI has reviewed its design basis accidents and has determined that its present design basis, as presented in the FSAR (through Amendment 25), conservatively bounds operation of Perry to 75% of rated thermal power with the RCIC system inoperable. Although appropriate administrative controls will be added to the RCIC system operating instructions and the plant off normal instructions, as necessary, this amendment will not require any changes to the emergency operating procedures. Therefore, CEI has concluded that this proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

CEI has determined, by conservative analysis, that the RCIC system is not required to mitigate the consequences of any accident or transient within the proposed power limit. Therefore, CEI has concluded that this proposed change does not involve a significant reduction in a margin of safety.

For these reasons, CEI has concluded that the proposed amendment involves no significant hazards considerations.

### Environmental Impact

Cleveland Electric Illuminating 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.

#### Statement of Emergency Circumstances

CEI requires this amendment in order to continue operation and startup testing of Perry Unit 1. CEI has scheduled a short outage following Test Condition Three (TC-3) to perform preplanned inspections and maintenance activities. CEI is evaluating appropriate system modifications during this outage to eliminate the effect. By performing appropriate system modifications, operation of the RCIC system will not cause any anomalies in reactor vessel water level instrumentation. It is anticipated that such modifications can be completed by December 31, 1987.

The Perry Technical Specifications allow operation to continue for 14 days provided the High Pressure Core Spray System is operable. If this change is not granted, CEI will be forced to shutdown the plant in accordance with plant Technical Specifications. In addition, further startup testing cannot be conducted as the plant Technical Specifications do not allow CEI to make changes in Operational Conditions with the RCIC system inoperable. This action meets 10 CFR 50.91(a)(5), in that "failure to act in a timely way would result in de-rating or shutdown of a nuclear power plant, or in prevention of either resumption of operation or of increase in power output..."

#### Administration

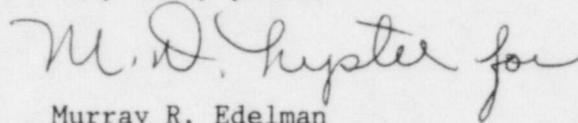
Pursuant to 10 CFR 10.12, the application fee of \$150.00 will follow under separate letter.

In accordance with 10 CFR 50.91(b)(1), the State of Ohio is provided with a copy of this license amendment request.

In order to preclude plant shutdown in accordance with the Perry Technical Specifications, and to allow for continued startup testing, it is necessary to amend the Perry TS no later than Friday, February 20, 1987. We therefore, request that this amendment be processed as an emergency request in accordance with 10 CFR 50.91(a)(5).

A marked up copy of the Technical Specification page is attached. Should you have any questions, please feel free to call me.

Very truly yours,

A handwritten signature in cursive script, appearing to read "M. R. Edelman for".

Murray R. Edelman  
Senior Vice President  
Nuclear Group

MRE:njc

Attachment

cc: Jay Silberg, Esq.  
Paul Leech (2)  
K. A. Connaughton  
USNRC, Region III  
Mr. James W. Harris (State of Ohio)