



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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*Serving The Best Location in the Nation*  
PERRY NUCLEAR POWER PLANT

**Murray R. Edelman**

SR. VICE PRESIDENT  
NUCLEAR

September 17, 1987  
PY-CEI/NRR-0720 L

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

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

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 170.21 a check in the amount of \$150.00 is enclosed. In accordance with 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 Sections 3.0.4, 4.0.3, and 4.0.4, and the Bases section for the Technical Specifications 3.0 and 4.0. In addition, this amendment deletes numerous Technical Specification statements which presently take exception to the provisions of Specification 3.0.4. These changes use the guidance provided by the NRC staff in Generic Letter 87-09 dated June 4, 1987.

Attachment 1 provides the Summary, 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 me.

Very truly yours,

Murray R. Edelman  
Senior Vice President  
Nuclear Group

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PDR ADDCK 05000440  
P PDR

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

*Handwritten notes:*  
A001  
w/ check  
\$150  
#C38634

### Summary

On June 4, 1987 the NRC staff issued Generic Letter 87-09 dealing with recent initiatives undertaken by the NRC staff and the nuclear industry to improve Technical Specifications. The generic letter provided guidance for three specific problems encountered with the general requirements on the applicability of Limiting Conditions for Operation (LCO) and Surveillance Requirements in Sections 3.0 and 4.0. The generic letter included the NRC's modified version of Section 3.0 and 4.0 of the BWR Standard Technical Specification (STS), and provided the staff's updated version of the BWR STS Bases for these sections. The generic letter stated that the NRC staff has concluded that these modifications will improve the Technical Specifications for all plants, and encouraged licensees to propose changes to their Technical Specifications consistent with the generic letter guidance. CEI has reviewed the generic letter with its enclosures and concluded that the proposed modifications are an improvement over the present wording. Attachment 2 is the revised Technical Specification pages and the revised bases.

### 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. The changes being proposed are administrative in nature and are being made to correct inconsistencies in the present wording of the general section 3.0 and 4.0 of the Technical Specifications. As such, the proposed change does not affect any evaluated accident.

The proposed change does not create the possibility of a new or different kind of accident. As stated above, the proposed changes are administrative changes which do not create the possibility of any new accident.



The proposed change does not involve a significant reduction in the margin of safety. The changes to Section 3.0.4 allows startups under conditions which conformance to the Action Requirements establishes an acceptable level of safety for unlimited continued operation of the facility, while delaying a return to power operation when the facility is required to be shutdown as a consequence of an Action Requirement. The change to Section 4.0.3 allows appropriate time for performing a missed surveillance before shutdown requirements apply to permit the performance of the missed surveillances based on consideration of plant conditions, adequate planning, availability of personnel, and the time to perform the surveillance. The NRC staff stated in the Generic Letter that it is overly conservative to assume that systems or components are inoperable when a surveillance has not been performed.

Therefore, allowing sufficient time to perform the surveillance does not significantly reduce the margins of safety. The final changes to Section 4.0.4 is a clarification to permit passage through or to operational modes as required to comply with Action Requirements even though a surveillance requirement has not been performed. To not permit this would increase the potential for plant upsets, and would challenge safety systems. The revision would also permit mode changes when a surveillance requirement has not been met, and can only be completed after entering into a mode or specific condition. This condition does not significantly reduce the margin of safety, but in fact potentially increases the margin of safety, by permitting entry into lower modes of operation more quickly.

Thus, there is not a significant reduction in the margin of safety.

Therefore, CEI has concluded that this 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.