



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN  
SR. VICE PRESIDENT  
NUCLEAR

July 30, 1987  
PY-CEI/NRR-0684 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 4.8.1.2.e.1 to agree with Revision 2 of Appendix II of the TDI Diesel Generators Owners Group Design, Review and Quality Revalidation (DRQR) Report. This report has been previously reviewed by the NRC staff.

Attachment 1 provides the Summary, Significant Hazards Review, and Environmental Impact Considerations. Attachment 2 is a marked up copy of the Technical Specification page. Attachment 3 is a marked up copy of Attachment 2 to the Operating license updating the Safety Evaluation Report reference to the July 8, 1986 Report.

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

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Check

### Summary

CEI has implemented the recommendations of Revision 2 of Appendix II of the TDI Diesel Generators Owners Group Design, Review and Quality Revalidation (DRQR) Report. Appendix II of the DRQR Report presents a schedule of maintenance and surveillance procedures recommended by the owners groups for implementation at the Perry Nuclear Power Plant. The NRC Staff's review of this program is documented in a letter from Walter R. Butler of the NRC to CEI's Murray R. Edelman dated July 8, 1986.

To bring the Technical Specifications in line with the DRQR maintenance schedule, it is requested that the diesel inspection based on manufacturer's recommendations be changed from 18 months, to every refueling outage. This same change has recently been approved by the NRC at another BWR-6 with TDI Diesels.

Also it is requested that the Safety Evaluation Report referenced in NPF-58 Attachment 2, Section 1 be revised to reference the July 8, 1986 letter. This SER was sent to CEI for comment on July 8, 1986. Comments were made by CEI on the SER and on what changes should be made to the attachment in CEI's letter to Dr. W. R. Butler dated August 25, 1986 (PY-CEI/NRR-0518L). The changes requested by this letter were incorporated in the full power license when it was issued. However, the attachment was never updated to the July 8, 1986 SER.

### Safety Analysis

In July 1986 the NRC staff's generic Safety Evaluation Report (SER) on the operability/reliability of Emergency Diesel Generators (EDGs) manufactured by Transamerica Delaval, Inc. (TDI) was transmitted to CEI via cover letter. The NRC staff concluded that compliance with the recommendations contained in the generic SER would provide an acceptable, technical resolution of the concerns regarding the performance of TDI EDGs for service at nuclear plants. The cover letter stated that technical resolution involved implementation by CEI of the following major elements.

- (1) Phase I: Resolution of 16 known generic problems areas intended by the Owners Group to serve as an interim basis for the licensing plants;
- (2) Phase II: A design review/quality revalidation (DR/QR) of a large set of important engine components to assure that their design and manufacture are adequate; and
- (3) Expanded engine tests and inspections to support Phase I and II.



The NRC staff at that time concluded that for Perry load restrictions relative to diesel engine performance discussed in Perry SER Supplement No. 8 had been addressed in the Perry Unit 1 Technical Specifications, and that the critical maintenance/surveillance actions were cited as License Conditions. As such the NRC staff noted that the only change required to be made to the Perry Nuclear Power Plant Unit 1 license would be the changing of Item 6 in Attachment 4 to the low power license. This item dealt with requiring staff approval for operation beyond the first refueling outage. Based on this recommendation this requirement was deleted when the full power license was issued (NPF-58).

CEI has addressed all three of the major elements listed above. Specifically, CEI has implemented Phase I and II as discussed in the generic SER and the maintenance and surveillance recommendations developed by the Owner's Group in Appendix II Revision 2 of the DR/QR Report for PNPP; and future TDI recommendations would be evaluated by CEI and would be implemented as appropriate. The proposed revision to the Technical Specifications would change the required interval for the TDI EDGs from once every 18 months to once every refueling outage. This is in conformance with the interval recommended by the Owner's Group in Revision 2 of the DR/QR report for PNPP.

The NRC staff has required that any future revisions to the maintenance/surveillance program would be subject to the revisions of 10 CFR 50.59 in view of the importance of this program in ensuring the operability/reliability of the engines over the long term. This was made a license condition as part of the full power license Attachment 3 requirements. This change request updates this license condition by referencing the July 8, 1986 letter and generic SER.

#### **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 because the Transamerica Delaval Inc. (TDI) Owners Group Design Review and Quality Revalidation (DR/QR) Report requires inspections that are more thorough than the inspections normally being performed in accordance with manufacturers recommendations. CEI's commitment to the DRQR Report is designed to increase reliability of the Division I and II diesel generators.

Thus, there is no increase in the probability or consequences of any accident previously evaluated.

The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated because the change clarifies existing commitments presently being adhered to. Perry Nuclear Power Plant Unit 1 Facility Operating License NPF-58 currently contains a condition that CEI shall implement the TDI requirements as incorporated within the license. By implementing the recommendations of Revision 2 of Appendix II of the TDI DRQR Report, CEI will be implementing a program that has undergone extensive industry and regulatory review. (Re: Safety Evaluation Report Re: The Operability/Reliability of the Emergency Diesel Generators Manufactured by Transamerica Delaval, Inc. - Perry Nuclear Power Plant (Unit 1 and 2) - W. R. Butler to Murray R. Edelman dated July 8, 1986).

Thus, no new or different kind of accident scenario is introduced.

The proposed change does not involve a significant reduction in the margin of safety because the change makes the Technical Specifications consistent with the approved program which ensures generators for nuclear standby service is within the range normally assumed for diesel engines designed and manufactured in accordance with General Design Criterion (GDC) 17 and 10 CFR 50, Appendix B.

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

#### **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.