UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 5, 2021

Mr. Frank R. Payne
Site Vice President
Energy Harbor Nuclear Corp.
Perry Nuclear Power Plant
P.O. Box 97, SB306
Perry, OH 44081-0097

SUBJECT: PERRY NUCLEAR POWER PLANT, UNIT NO. 1 – ISSUANCE OF RELIEF REQUEST SR-2, REVISION 0, FROM CERTAIN REQUIREMENTS OF THE ASME OM CODE (EPID L-2021-LLR-0005 [COVID-19])

Dear Mr. Payne:

By letter dated January 15, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21018A004), as supplemented by letters dated February 8, 2021, February 19, 2021, February 24, 2021 (ADAMS Accession Nos. ML21039A785, ML21050A417, and ML21055A881, respectfully), Energy Harbor Nuclear Corp. (the licensee) proposed to the U.S. Nuclear Regulatory Commission (NRC) an alternative to specific requirements in the 2012 Edition of the American Society of Mechanical Engineers (ASME) Operation and Maintenance of Nuclear Power Plants, Division 1, OM Code: Section IST (OM Code) at Perry Nuclear Power Plant, Unit 1 (PNPP).

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(2), PNPP requested to use the proposed alternative in request SR-2, Revision 0, on the basis that complying with specific requirements of the OM Code for the snubbers within the scope its alternative request would result in hardship without a compensating increase in the level of quality and safety.

The NRC staff has determined that request SR-2, Revision 0, will provide reasonable assurance that the snubbers at PNPP, listed in that request, will be operationally ready to perform their safety functions until the spring 2023 refueling outage. The NRC staff finds that complying with the specific requirements of the OM Code identified in alternative request SR-2 for the specified snubbers at PNPP would result in hardship without a compensating increase in the level of quality and safety. Accordingly, the NRC staff concludes that PNPP has adequately addressed all the regulatory requirements set forth in 10 CFR 50.55a(z)(2). Therefore, the NRC authorizes the use of request SR-2 at PNPP until the next scheduled RFO in spring 2023.

All other requirements in the ASME OM Code for which relief or an alternative was not specifically requested and approved in this request remains applicable.

If you have any questions, please contact the Project Manager, Scott Wall, at 301-415-2855 or e-mail at Scott.Wall@nrc.gov.

Sincerely,

Robert F. Kuntz

Digitally signed by Robert F. Kuntz
Date: 2021.03.05 09:50:12 -05'00'

Nancy L. Salgado, Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-440

Enclosure:
Safety Evaluation

cc: Listserv

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

ALTERNATIVE REQUEST SR-2, REVISION 0

REGARDING SNUBBER TESTING FOR FOURTH 10-YEAR INSERVICE TESTING INTERVAL

ENERGY HARBOR NUCLEAR CORP.

PERRY NUCLEAR POWER PLANT, UNIT 1

DOCKET NO. 50-440

1.0 INTRODUCTION

By letter dated January 15, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21018A004), as supplemented by letters dated February 8, 2021, February 19, 2021, February 24, 2021 (ADAMS Accession Nos. ML21039A785, ML21050A417, and ML21055A881, respectfully), Energy Harbor Nuclear Corp. (the licensee) proposed to the U.S. Nuclear Regulatory Commission (NRC) an alternative to specific requirements in the 2012 Edition of the American Society of Mechanical Engineers (ASME) Operation and Maintenance of Nuclear Power Plants, Division 1, OM Code: Section IST (OM Code) for Perry Nuclear Power Plant, Unit 1 (PNPP), pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 55a, "Codes and Standards."

Specifically, pursuant to 10 CFR 50.55a(z)(2), the licensee proposed a one-time extension of snubber operational readiness testing activities from the spring 2021 refueling outage (RFO) to the spring 2023 RFO for specific snubbers in the Inservice Testing (IST) program at PNPP as listed in the alternative, "10 CFR 50.55a Request Number SR-2, Revision 0." The requested extension is due to Coronavirus Disease 2019 (COVID-19) issues.

The licensee asserts that compliance with the requirements in the ASME OM Code, Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants," paragraph ISTD-5200, "Inservice Operational Readiness Testing," to perform functional testing of specific snubbers according to the required schedule would result in a hardship without a compensating increase in the level of quality and safety in accordance with 10 CFR 50.55a(z)(2).

2.0 REGULATORY EVALUATION

The NRC regulations in 10 CFR 50.55a(g)(4), "Inservice inspection standards requirement for operating plants," state, in part, that throughout the service life of a boiling or pressurized water-cooled nuclear power facility, components (including supports) that are classified as ASME Code Class 1, Class 2, and Class 3 must meet the inservice inspection (ISI) requirements, set forth in Section XI of the editions and addenda of the American Society of Mechanical

Engineers Boiler and Pressure Vessel Code (ASME Code) or ASME OM Code for snubber examination and testing that become effective subsequent to editions and addenda specified in 10 CFR 50.55a(g)(2) and (3) and that are incorporated by reference in 10 CFR 50.55a(a), to the extent practical within the limitations of design, geometry, and materials of construction of the components.

The NRC regulations in 10 CFR 50.55a(b)(3)(v)(B), "Snubbers: Second provision," state that

> Licensees must comply with the provisions for examining and testing snubbers in Subsection ISTD of the ASME OM Code and make appropriate changes to the technical specifications or licensee-controlled documents when using the 2006 Addenda and later editions and addenda of Section XI of the ASME BPV Code.

The NRC regulations in 10 CFR 50.55a(z) state, in part, that alternatives to the requirements of 10 CFR 50.55a(b) through (h) may be used, when authorized by the NRC, if the licensee demonstrates (1) the proposed alternative would provide an acceptable level of quality and safety, or (2) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Based on the above, and subject to the following technical evaluation, the NRC staff finds that regulatory authority exists for the licensee to request the use of an alternative and the NRC to authorize the use of the proposed alternative.

3.0 TECHNICAL EVALUATION

3.1 Applicable ASME OM Code

The licensee's OM Code of Record is the 2012 of the ASME OM Code, as incorporated by reference in 10 CFR 50.55a, for the snubber program at PNPP for the fourth 10-Year IST snubber program interval, which started on May 18, 2019, and is scheduled to end on May 17, 2029. The OM Code of Record is the same for both the IST program and the snubber program (ADAMS Accession No. ML20045E972).

3.2 Licensee's Alternative Request

ASME OM Code, Subsection ISTD, specifies snubber IST requirements in the following paragraphs:

- ISTD-5200, "Inservice Operational Readiness Testing," states, in part, that "Snubbers shall be tested for operational readiness during each fuel cycle [every 2 years in this case]."

- ISTD-5240, "Test Frequency," and paragraph ISTD-5260, "Testing Sample Plans," specify the test frequency and testing sample plans, respectively.

- ISTD-5261, "Sample Plans," requires that the snubbers of each Defined Test Plan Group (DTPG) shall be tested using either of (1) the 10% testing sample plan, or (2) the 37 testing sample plan.

- ISTD-5300, "The 10% Testing Sample," and ISTD-5400, "The 37 Testing Sample Plan," specify these testing sample plans.

- ISTD-6000, “Service Life Monitoring,” specifies service life monitoring (SLM) requirements.

The licensee has chosen to implement the 37 testing sample plan or the 10 percent plan for the snubbers at PNPP as described in the following Tables 1, 2, and 3. Alternative testing is requested for the following snubbers (these snubbers are listed in the PNPP response to NRC request for additional information (RAI) supplement dated February 8, 2021):

Table 1 – PSA Mechanical Snubbers:
Safety Significant Snubbers (Subject to the 37 Testing Sample Plan)

Snubber Component Number	Snubber Model	Last Visual Exam Date	Date Last Tested or Replaced	Service Life End Date
1B21-H0013	PSA-35	3/25/2017	4/10/1999	4/30/2049
1B21-H0065 (NW)	PSA-35	3/25/2017	2/6/1993	2/6/2033
1B21-H0119 (NE)	PSA-35	3/8/2017	9/26/1997	11/18/2047
1B21-H0410	PSA-35	3/18/2017	3/2/1994	11/18/2047
1C11-H0693	PSA-1/4	3/8/2019	3/15/1999	10/30/2050
1C41-H5020	PSA-1/4	3/11/2019	4/18/1992	11/18/2047
1E12-H0325	PSA-10	3/10/2019	11/18/1987	11/18/2027
1E12-H0333	PSA-3	3/10/2019	11/18/1987	11/18/2027
1E12-H0345	PSA-3	2/20/2019	2/19/2009	11/18/2047
1E12-H0365	PSA-10	3/4/2019	11/18/1987	11/18/2027
1E12-H0383	PSA-1	3/7/2019	2/15/2005	5/12/2052
1E12-H0410	PSA-35	3/6/2019	3/25/2003	3/11/2041
1E12-H0422	PSA-3	3/7/2019	2/26/2007	11/18/2047
1E12-H0542	PSA-1/2	3/7/2019	3/26/1999	11/18/2047
1E12-H0730	PSA-35	3/7/2019	2/13/1996	11/18/2047
1E12-H0760	PSA-1	3/20/2019	2/6/2001	11/18/2047
1E12-H0762	PSA-1	3/5/2019	4/18/1992	11/18/2047
1E12-H0782 (Top)	PSA-1	3/7/2019	11/18/1987	11/18/2027
1E12-H2299	PSA-1/2	3/21/2019	5/1/1992	11/18/2047
1E21-H0004	PSA-35	3/20/2017	11/18/1987	11/18/2027
1E21-H0008	PSA-10	3/7/2019	3/21/2007	11/18/2047
1E22-H0053	PSA-3	3/8/2019	3/30/2011	11/18/2047
1E22-H0060	PSA-10	3/8/2019	3/11/2003	11/18/2047
1G33-H0219	PSA-10	3/27/2017	2/15/1996	11/18/2047

Table 1 (continued) – PSA Mechanical Snubbers:
Safety Significant Snubbers (Subject to the 37 Testing Sample Plan)

Snubber Component Number	Snubber Model	Last Visual Exam Date	Date Last Tested or Replaced	Service Life End Date
1G41-H0070	PSA-1	3/29/2019	3/10/1994	11/18/2047
1G41-H0145	PSA-10	3/4/2019	11/18/1987	11/18/2027
1G41-H0151 (Bot)	PSA-3	3/18/2019	9/29/1990	11/18/2047
1G41-H0450 (West)	PSA-3	2/27/2019	11/18/1987	11/18/2027
1G41-H5001 (Top)	PSA-3	3/4/2019	3/13/2013	11/18/2047
1N11-H0284	PSA-35L	3/14/2017	3/26/1992	11/18/2047
1N27-H0224	PSA-35	3/27/2017	3/11/2017	11/18/2047
1P11-H0063	PSA-35	3/7/2019	11/18/1987	11/18/2027
1P42-H0051	PSA-3	3/25/2019	3/20/2015	11/18/2047
1P42-H0388	PSA-1	3/18/2019	2/12/2009	11/18/2047
1P45-H0132 (N)	PSA-3	3/18/2019	2/23/2017	7/21/2043
1P45-H0183	PSA-10	3/25/2019	2/28/1996	11/18/2047
1P45-H0353 (Top)	PSA-3	3/25/2019	5/9/1992	11/18/2047

Table 2 – Lisega Hydraulic Snubbers:
Safety Significant Snubbers (Subject to the 10% Testing Sample Plan)

Snubber Component Number	Snubber Model	Last Visual Exam Date	Date Last Tested or Replaced	Service Life End Date
1B21-H0445	304256RC1	3/9/2017	3/11/2015	7/11/2023*
1B21-H0453	305253RF3	3/9/2017	6/20/2013	10/20/2021*
1E12-H0109	304256RE1	3/5/2019	2/13/2009	3/2/2039
1E12-H0790	304256RE1	2/18/2019	2/15/2019	2/18/2059
1E21-H0039	304256RE1	2/18/2019	2/15/2019	2/18/2059
1E21-H0050 (W)	306256RE2	2/20/2019	2/14/1996	2/19/2036
1E51-H0072	305253RF3	3/9/2017	3/1/2017	7/9/2025
1E51-H0073	304256RC1	3/16/2017	3/21/2013	7/21/2021*
1E51-H2078	301856RE2	3/16/2017	3/20/2013	7/20/2021*

Note for Table 2: *These four Lisega hydraulic snubbers 1B21-H0445, 1B21-H0453, 1E51-H0073, and 1E51-H2078 are scheduled to be tested and replaced during the spring 2021 RFO, and PNPP will select four different snubbers in this 10% sample plan, to replace these four replaced snubbers during spring 2023 RFO, as stated in a PNPP letter dated February 24, 2021.

Table 3 – E-Systems Hydraulic Snubbers:
Safety Significant Snubbers (Subject to the 10% Testing Sample Plan)

Snubber Component Number	Snubber Model	Last Visual Exam Date	Date Last Tested or Replaced	Service Life End Date
1B21-G7080-S104A	50 KIP	3/27/2017	5/7/2011	5/21/2035
1B33-G7068B-S373B	100 KIP	3/27/2019	3/27/2019	3/12/2029
1E12-H0316	20 KIP	3/10/2019	2/6/2001	2/6/2041
1N27-H0001	50 KIP	3/27/2017	4/4/2013	4/4/2037
1N27-H0018	70 KIP	3/27/2017	3/22/2017	3/27/2041
1N27-H0019	70 KIP	3/27/2019	4/15/2013	4/15/2037

The licensee has proposed a one-time extension of the functional testing interval for the snubbers listed in Tables 1, 2 and 3 of this safety evaluation (SE) from the spring 2021 RFO to the spring 2023 RFO.

3.3 Reason for Request

The licensee reported that the snubbers listed in its request are functionally tested in accordance with the frequency specified in ASME OM Code (2012 Edition), Subsection ISTD, paragraph ISTD-5200, each fuel cycle (every 2 years). Therefore, these snubbers were scheduled to be functionally tested during the RFO in the spring of 2021.

On March 13, 2020, the United States Federal government declared a national emergency pursuant to the Stafford Act due to the serious public health risk of the COVID-19 and resulting pandemic. The licensee stated that the most recent guidance at that time from the Centers for Disease Control and Prevention (CDC) included recommendations for social distancing by maintaining approximately 6 feet from other personnel to limit the spread of the virus.

The licensee submitted its request considering the expected hardship of obtaining and maintaining onsite staff sufficient to prepare, perform, and recover from the examination. The licensee stated that the functional testing of the snubbers listed in its request during the spring 2021 RFO at PNPP would represent a hardship during the COVID-19 outbreak. For example, the licensee intends to reduce the amount of personnel on site to prevent the spread of COVID-19 at PNPP. Therefore, the licensee asserted that the testing of the specified snubbers at PNPP, during the spring 2021 RFO, would result in a hardship without a compensating increase in the level of quality and safety in accordance with 10 CFR 50.55a(z)(2).

3.4 Proposed Alternative

The licensee proposed an extension of the IST program testing intervals for the snubbers listed in its request, currently scheduled for testing during the RFO in the spring of 2021. In its request for a one-time extension of the operational readiness testing for the specified snubbers, the licensee provided information indicating that the service life of those snubbers extends to at least the RFO in the spring of 2023. The licensee stated that the request does not impact the SLM program and that activities associated with service life monitoring scheduled for the spring 2021 RFO will still be performed to meet operational requirements until the next refueling outage. If maintenance is unsuccessful, the licensee reported that corrective actions would be performed for those snubbers. Further, the licensee stated that based on the PNPP snubber test history, since 2011, there have been approximately 260 tests of program snubbers with only four snubbers not meeting their test criteria.

3.5 Basis for Use

The licensee stated that there have been no dynamic events or transients during plant operation since the spring 2019 RFO that might affect snubber performance. Overall, the licensee stated that the snubber population at PNPP has been operating at a high level of performance for the past 10 years. The licensee stated that there are no planned changes to the snubber environments or operating conditions that would affect the snubbers differently than represented in past surveillance testing. The licensee asserted that the performance of these snubbers supports extending the one-time operational readiness test interval and provides reasonable assurance that the snubbers are operationally ready to perform their safety functions.

The licensee stated that the visual examination interval specified in ASME OM Code, Subsection ISTD, Table ISTD-4252-1, “Visual Examination Table,” has been extended for applicable PNPP snubbers to at least once every 10 years in accordance with ASME Code Case OMN-13, “Performance-Based Requirements for Extending Snubber Visual Examination Interval at LWR [light-water reactor] Power Plants.” Since the 10-year visual examination interval began in May 2019, visual examinations can be performed at any time during the next 10 years to meet the visual examination requirement. No periodic snubber visual examinations will be performed during the spring 2021 RFO, and no alternatives to visual examination requirements are proposed.

The licensee stated that this request does not impact the SLM program at PNPP. Within the provisions of ASME OM Code, Subsection ISTD, paragraph ISTD-6200, “Service Life Evaluation,” service life is evaluated each fuel cycle and may be increased or decreased, if warranted**.**

Further, the licensee indicated that SLM activities would be performed during the spring 2021 RFO to ensure the snubber service life will not be exceeded. If maintenance is unsuccessful, corrective actions will be performed as appropriate to ensure service life is not exceeded. The licensee stated that inservice testing of the PNPP snubbers specified in Tables 1, 2, and 3 will resume in the spring 2023 RFO in accordance with paragraph ISTD-5200 of the ASME OM Code, Subsection ISTD. The PSA Mechanical Snubbers specified in Table 1 will be functionally tested in accordance with the 37 sample plan. Whereas, the Lisega Hydraulic Snubbers specified in Table 2, and E-System Hydraulic Snubbers specified in Table 3 will be functionally tested in accordance with 10% sample plan. The licensee also stated that SLM program activities as required by the paragraph ISTD-6000 will be performed at PNPP, during the spring of 2023 RFO.

3.6 Duration of Proposed Alternative

For request SR-2, Revision 0, the licensee requested an alternative to allow a one-time extension of the operational readiness testing interval for the snubbers listed in Tables 1, 2, and 3 of this SE at PNPP during the spring 2021 RFO. The licensee stated that it will resume the normal outage examination frequency at the next opportunity, currently expected to be the next RFO in the spring of 2023.

3.7 NRC Staff Evaluation

As incorporated by reference in 10 CFR 50.55a, ASME OM Code (2012 Edition), Subsection ISTD, requires that snubbers shall meet (1) the inservice visual examination requirements in paragraph ISTD-4000, "Specific Examination Requirements," (2) the inservice operational readiness testing requirements in paragraph ISTD-5000, "Specific Testing Requirements," and (3) the SLM requirements in paragraph ISTD-6000. Paragraph ISTD-5200 requires that snubbers within the scope of the ASME OM Code that have specific inservice operational readiness requirements are required to be functionally tested at least once every fuel cycle (2 years, in this case). As a result, the PNPP snubbers listed in Tables 1, 2 and 3 of this SE are required to be functionally tested during RFO in the spring of 2021.

In its supplemental letter dated February 8, 2021, the licensee reported that the service life expiration date for all snubbers specified in its request is at least 2027, except four Lisega hydraulic snubbers 1B21-H0445,1B21-H0453, 1E51-H0073, and 1E51-H2078, as listed in the Table 2. In response to the NRC staff's request for clarification, the licensee stated in letters dated February 19, 2021, and February 24, 2021, that these four snubbers were selected for replacement in accordance with ISTD-5311, "Initial Sample Size and Composition," subparagraph (b), due to their service life end dates in 2021 and 2023. Hence, the licensee stated that PNPP will select four different snubbers in place of these four replaced snubbers, prior to the spring of 2023 RFO to ensure compliance with the Code requirement to meet ISTD-5300 for the 10 percent sample plan. The evaluation determined that the service life of snubbers as specified in Tables 1, 2 and 3, did not require reduction due to any environmental conditions and that the snubbers have experienced very few failures in the last 10 years. These failures are evaluated under the licensee's corrective action program for cause and extent of condition.

Further, the licensee stated that based on the PNPP snubber test history since 2011, there have been approximately 260 tests of program snubbers with only four snubbers not meeting their test acceptable criteria. In its supplemental letter dated February 8, 2021, the licensee stated that one of the four snubber 1E12H0280 failures was under the 37 sample plan during spring 2017 RFO and resulted in a random selection of 19 more snubbers from the corresponding snubber population at PNPP for operational readiness testing as required by the ASME OM Code, paragraph ISTD-5412, "Additional Sample Size," and paragraph ISTD-5420, "The 37 Testing Sample Plan Additional Testing." The licensee reported that all 19 of those snubbers passed their tests with no additional failures. Two of the snubbers (1N22H0127 and 1E12H0322) that failed were under the 37 sample plan during the spring of 2015 RFO. The failure of snubber 1N22H0127 resulted in a random selection of 18 more snubbers from the corresponding snubber population at PNPP for operational readiness testing. The licensee reported that all 18 of these snubbers passed their tests with no additional failures. The fourth snubber 1H22H0365 failure was under the 37 sample plan during the spring of 2013 RFO, and resulted in an additional random selection of 19 more snubbers from the corresponding snubber population at PNPP for operational readiness testing. The licensee reported that all 19 of these

snubbers passed their tests with no additional failures. The NRC staff considers this to be acceptable because this meets the requirements of the ASME OM Code, Subsection ISTD, paragraph ISTD-5430, "The 37 Testing Sample Plan Completion."

The NRC staff also requested additional information regarding the visual examination history of the snubber population in a request for additional information dated February 1, 2021, as this information was not included in the initial submittal. In its response dated February 8, 2021, the licensee provided the visual examination date for all the snubbers under the scope of this alternative request and included in Tables 1, 2 and 3, and found acceptable, because this meets the requirement of the ASME OM Code Subsection paragraph ISTD-4200, "Inservice Examination," and the ASME OM Code Case OMN-13.

The licensee reported that there are no planned changes to the snubber environmental or operating conditions that would affect the snubbers in a different manner than represented during the past surveillance testing. The licensee indicated that no deficiencies, adverse trends, or maintenance work orders have been identified that would impact or degrade any snubber's performance capability. The licensee stated that there have been no dynamic events or transients during plant operation since the previous RFO that might affect snubber performance. The NRC staff further confirmed that the population of snubbers within the scope of this proposed alternative request will remain within the predicted service life interval through the end of the spring 2023 RFO.

In its request, the licensee provided justification that compliance with the requirements in the ASME OM Code, Subsection ISTD, paragraph ISTD-5200, as incorporated by reference in 10 CFR 50.55a, to conduct functional testing of specific snubbers at PNPP during the spring 2021 RFO would result in a hardship without a compensating increase in the level of quality and safety in accordance with 10 CFR 50.55a(z)(2). For example, the licensee indicated that the functional testing of snubbers during the spring 2021 RFO would represent a hardship during this COVID-19 outbreak because the licensee intends to reduce the amount of personnel on site to prevent the spread of COVID-19 at PNPP. The licensee was also contingency planning in case some of its workforce became unavailable due to the COVID-19 outbreak.

Based on the information described above for the specific snubbers at PNPP listed in the licensee's request, the NRC staff finds that: (1) snubber population testing during the past 10 years indicates their acceptable historical performance; (2) ongoing inservice visual examination and testing activities have not identified snubber performance concerns; (3) SLM activities of all snubbers are performed every RFO, and service life maintenance activities will continue as needed; and (4) a hardship existed for certain IST program activities related to these snubbers during the RFO in the spring of 2021 that would be contrary to the health and safety of plant personnel.

Therefore, the NRC staff finds that the licensee's proposed alternative for a one-time extension of operational readiness testing for the specified snubbers at PNPP, in accordance with 10 CFR 50.55a(z)(2) will provide reasonable assurance that the snubbers will be operationally ready to perform their safety functions until the spring 2023 RFO.

4.0 CONCLUSION

The NRC staff concludes that proposed alternative SR-2, Revision 0, will provide reasonable assurance that the snubbers at PNPP listed in the licensee's request are operationally ready to perform their safety functions until the spring 2023 RFO. The NRC staff finds that complying

with certain requirements of the ASME OM Code would result in hardship without a compensating increase in the level of quality and safety. Accordingly, the NRC staff concludes that the licensee has adequately addressed all the regulatory requirements set forth in 10 CFR 50.55a(z)(2). Therefore, the NRC authorizes the use of proposed alternative SR-2, Revision 0, at PNPP, until the next scheduled RFO in the spring of 2023.

All other requirements in the ASME OM Code for which relief or an alternative was not specifically requested and approved in this request remain applicable.

Principal Contributor: Gurjendra Bedi

Date: March 5, 2021

SUBJECT: PERRY NUCLEAR POWER PLANT, UNIT NO. 1 – ISSUANCE OF RELIEF REQUEST SR-2, REVISION 0, FROM CERTAIN REQUIREMENTS OF THE ASME OM CODE (EPID L-2021-LLR-0005 [COVID-19]) DATED MARCH 5, 2021

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