



*Energy Harbor Nuclear Corp.
Perry Nuclear Power Plant
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Rod L. Penfield
Site Vice President, Perry Nuclear

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August 17, 2021
L-21-206

10 CFR 50.90
10 CFR 50.12

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT:

Perry Nuclear Power Plant, Unit No. 1
Docket No. 50-440, License No. NPF-58
Regulatory Audit for Review of License Amendment Regarding Revising the Flood Hazard Protection Scheme (EPID L-2021-LLA-0067)

By letter dated April 7, 2021 [Agencywide Documents Access and Management System (ADAMS) Accession No. ML21106A027], Energy Harbor Nuclear Corp. submitted to the Nuclear Regulatory Commission (NRC) a license amendment request for the Perry Nuclear Power Plant (PNPP) to revise the Updated Safety Analysis Report (USAR) to change the methodology used for analysis of flooding hazards and drainage within the local intense precipitation (LIP) domain and reflect the results from the new analysis. Based on the new analysis, a new flood hazard protection scheme is also proposed for PNPP. In addition, Energy Harbor Nuclear Corp. requested exemptions in accordance with 10 CFR 50.12 to credit non-safety related protection features including: (1) permanent (passive) and temporary (deployable) flood barriers, and (2) the plant storm drain system in mitigation of flood levels during a LIP event.

By letter dated July 9, 2021 (ADAMS Accession No. ML21165A001), the NRC staff described the terms and conditions of using a regulatory audit to support review of these requests and provided a regulatory audit plan. Energy Harbor Nuclear Corp. agrees to the terms and conditions set forth in the letter.

As part of the NRC audit, the NRC staff requested that executable electronic versions of the input and output files for key scenarios and final selected ones used in the license amendment request to simulate (i) FLO-2D LIP flooding, and (ii) inflows and streams course models for the two streams "Major" and "Diversion" be made available. These files should also be submitted for docketing.

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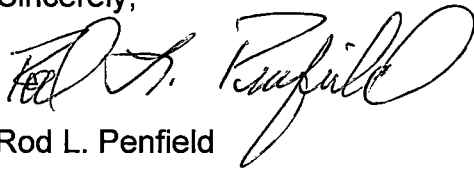
The requested input/output files are provided in their native file format on the enclosed hard drives. Each hard drive contains one copy of the electronic information for the following calculations.

- 50:64.000, *PNPP Site Modifications Local Intense Precipitation (Design Basis)*, Revision 1
- 50:72.000, *Design Basis Major Stream Probable Maximum Flood (PMF)*, Revision 0
- 50:73.000, *Design Basis Diversion Stream Probable Maximum Flood (PMF)*, Revision 0

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Phil H. Lashley, Manager – Fleet Licensing, at 330-696-7208.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 17, 2021.

Sincerely,



Rod L. Penfield

Enclosure:

Hard drive with electronic information (2 hard drives provided)

cc: NRC Region III Administrator (w/o Enclosure)
NRC Resident Inspector (w/o Enclosure)
NRR Project Manager (w/o Enclosure)
Executive Director, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison) (w/o Enclosure)
Utility Radiological Review Board (w/o Enclosure)

Enclosure
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Hard drive with electronic information
(2 hard drives provided)