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Perry Nuclear Power Plant  
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September 2, 2021  
L-21-212

10 CFR 50.90

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

**SUBJECT:**

Perry Nuclear Power Plant  
Docket No. 50-440, License No. NPF-58  
Supplemental Information Regarding a Request for Licensing Action to Revise the  
Technical Specifications

By letter dated December 14, 2020 (Accession No. ML20350B499), Energy Harbor Nuclear Corp. (EHNC) submitted a request for licensing action to amend the Perry Nuclear Power Plant (PNPP), Unit No. 1 Technical Specifications to adopt TSTF-566, Revision 0, "Revise Actions for Inoperable RHR Shutdown Cooling Subsystems," and TSTF-580, Revision 1, "Provide Exception from Entering Mode 4 With No Operable RHR Shutdown Cooling."

TSTF-566, Revision 0 was approved on February 21, 2019 (Accession No. ML19028A287). However, at the time of application, TSTF-580, Revision 1 had not been officially issued. The NRC has now approved and issued TSTF-580, Revision 1 on July 12, 2021 (Accession No. ML21188A283).

EHNC has reviewed the NRC staff's safety evaluation of TSTF-580, Revision 1 and compared it to the request for licensing action dated December 14, 2020 (Accession No. ML20350B499). From that review, it has been concluded that the request for licensing action conforms to the technical and regulatory evaluation provided in the approved TSTF-580, Revision 1.

EHNC requests adoption of TSTF-580, Revision 1 with the following editorial variations. TSTF-580, Revision 1, Section 2.2, "Proposed Changes to the Standard Technical Specifications (STS)," and Section 3.5, "Evaluation of Changes to Renumbered Condition E," state that the existing Condition C and associated required actions in STS 3.4.9 will be renumbered as Condition E and Required Actions E.1, E.2, and E.3. For the current PNPP TS 3.4.9, it will be Condition B and associated required actions that will be renumbered as Condition E and Required Actions E.1, E.2, and E.3. This

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difference is due to TSTF-566, Revision 0 being implemented simultaneously with TSTF-580, Revision 1. This variation is administrative and does not affect the applicability of TSTF-580, Revision 1 to the PNPP TS.

In addition, during review of the enclosure provided in the request for licensing action, the EHNC staff identified that the statement regarding the system design and operation of the RHR Shutdown Cooling mode of operation needed clarification. The discussion of RHR Shutdown Cooling provided in Section 2.1.4 implies that the mode 3 and 4 return path is through the discharge line of a recirculation pump. This description of the return path is being clarified to state that water is removed from one recirculation loop suction piping, cooled by the RHR heat exchanger, and is discharged by either feedwater header. These differences do not affect the applicability of TSTF-566, Revision 0 and TSTF-580, Revision 1 to the PNPP technical specifications.

There are no regulatory commitments contained in this submittal. 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 September 2, 2021.

Sincerely,

Christopher Elliott



cc: NRC Region III Administrator  
NRC Resident Inspector  
NRC Project Manager  
Branch Chief, Ohio Emergency Management Agency, State of Ohio (NRC Liaison)  
Utility Radiological Safety Board