



Energy Harbor Nuclear Corp.
Perry Nuclear Power Plant
10 Center Road
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Rod L. Penfield
Site Vice President, Perry Nuclear

440-280-5382

April 28, 2022
L-22-110

10 CFR 50.55a

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
Response to Request for Additional Information regarding 10 CFR 50.55a Request
Number VR-12, Revision 0, "Request for Relief from Containment Isolation Valve ASME
OM Code Requirements"
(EPID No. L-2022-LLR-0004)

By letter dated January 5, 2022 (Agencywide Document Access and Management System [ADAMS] Accession No. ML22005A351), Energy Harbor Nuclear Corp. requested Nuclear Regulatory Commission (NRC) staff approval of request VR-12, Revision 0. This request proposed an alternative to the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) of Nuclear Power Plants code requirements for certain Perry Nuclear Power Plant (PNPP) containment isolation valves. By email dated March 30, 2022 (ADAMS Accession No. ML22089A245), the NRC staff requested additional information regarding the proposed change. The Energy Harbor Nuclear Corp. response to this request is attached.

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.

Sincerely,

A handwritten signature in black ink, appearing to read "Rod L. Penfield", written in a cursive style.

Rod L. Penfield

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Attachment:

Response to Request for Additional Information

cc: NRC Region III Administrator
NRC Resident Inspector
NRC Project Manager

Response to Request for Additional Information
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RAI

In the January 5, 2022 submittal, the licensee discusses its proposal for an alternative to the requirements in ASME OM Code, Subsection ISTC, paragraph ISTC-3700. However, the licensee does not discuss the actions to meet the requirements in 10 CFR 50.55a(b)(3)(xi) at the extended testing interval for valve position indication.

Please describe the actions to be taken as part of Alternative Request VR-12 to meet 10 CFR 50.55a(b)(3)(xi) to verify that the remote indicating lights provide accurate indication of the obturator position for both the open and close stroke of each valve at PNPP within the scope of Alternative Request VR-12.

Response:

In the closed direction, the requirements will be met by verifying proper remote indicating lights in conjunction with measured leakage of 1,000 standard cubic centimeters per minute or less for pneumatically tested valves, and 0.5 gallons per minute or less for hydrostatically tested valves using local leak rate testing equipment. These measurements are obtained during execution of test instructions to satisfy the requirements of ASME OM Code-2012, Subsection ISTC-3700, Position Verification Testing.

In the open direction, the requirements will be met by verifying proper remote indicating lights in conjunction with a pressure drop when the valves are opened at test pressure. This is measured immediately following the position verification testing in the closed position described in the preceding paragraph. The test instructions will include acceptance criteria for flow in conjunction with pressure drop to verify accurate indication of obturator position using local leak rate testing equipment. These measurements will be obtained during execution of test instructions to satisfy the requirements of ASME OM Code 2012, Subsection ISTC-3700, Position Verification Testing.

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These tests meet the requirements of 10 CFR 50.55a(b)(3)(xi) to verify accurate obturator indication for the valves listed in Table 1 of the letter dated January 5, 2022.