



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

May 18, 2026

Mr. Terry J. Brown  
Site Vice President  
Vistra Operations Company LLC  
Perry Nuclear Power Plant  
Mail Stop A-PY-A290  
10 Center Road  
Perry, OH 44081-0097

SUBJECT: PERRY NUCLEAR POWER PLANT, UNIT NO. 1 - REGULATORY AUDIT SUMMARY FOR THE REVIEW OF LICENSE AMENDMENT REGARDING RELOCATION OF PRESSURE AND TEMPERATURE LIMIT CURVES TO THE PRESSURE AND TEMPERATURE LIMITS REPORT (TSTF-419) (EPID L-2026-LLA-0035)

Dear Mr. Brown:

By letter dated February 26, 2026 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML26061A012), Vistra Operations Company LLC (the licensee) submitted a license amendment request for Perry Nuclear Power Plant (PNPP), Unit No. 1. The proposed change would modify Technical Specification Section 1.0, "DEFINITIONS," Section 3.4.11, "RCS Pressure and Temperature (P/T) Limits," and Section 5.0, "ADMINISTRATIVE CONTROLS," by replacing the existing reactor vessel heatup and cooldown rate limits and the pressure and temperature limit curves with references to the Pressure and Temperature Limits Report.

To support its review, by letter dated April 10, 2026 (ML26096A070), the NRC staff notified the licensee that they would conduct a regulatory audit from April 6, 2026, through May 15, 2026, through an online portal (also known as electronic portal, ePortal, electronic reading room) established by the licensee.

T. Brown

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If you have any questions, please contact me at (301) 415-2855, or by e-mail at [Scott.Wall@nrc.gov](mailto:Scott.Wall@nrc.gov).

Sincerely,

*/RA/*

Scott P. Wall, Senior Project Manager  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-440

Enclosure:  
Regulatory Audit Summary

cc: Listserv

REGULATORY AUDIT SUMMARY  
TO SUPPORT REVIEW OF LICENSE AMENDMENT REQUEST  
TO RELOCATE PRESSURE AND TEMPERATURE LIMIT CURVES  
TO THE PRESSURE AND TEMPERATURE LIMITS REPORT  
VISTRA OPERATIONS COMPANY LLC  
ENERGY HARBOR NUCLEAR GENERATION, LLC  
PERRY NUCLEAR POWER PLANT, UNIT NO. 1  
DOCKET NO. 50-440

1.0 BACKGROUND

By letter dated February 26, 2026 (Agencywide Documents Access and Management System Accession No. ML26061A012), Vistra Operations Company LLC (Vistra OpsCo, the licensee) submitted a license amendment request (LAR) for Perry Nuclear Power Plant (PNPP). The proposed change would modify Technical Specification (TS) Section 1.0, "DEFINITIONS," Section 3.4.11, "RCS Pressure and Temperature (P/T) Limits," and Section 5.0, "ADMINISTRATIVE CONTROLS," by replacing the existing reactor vessel heatup and cooldown rate limits and the pressure and temperature (P/T) limit curves with references to the Pressure and Temperature Limits Report (PTLR).

The U.S. Nuclear Regulatory Commission (NRC) staff performed a preliminary review of the LAR and determined that a regulatory audit would assist in the timely completion of the review. An audit plan was provided to the licensee on April 10, 2026 (ML26096A070), which provided the list of requested documents and other details pertaining to the audit. The purpose of the audit was to gain an understanding of the information needed to support the NRC staff's licensing decision regarding the LAR and to develop requests for additional information (RAIs), if necessary. The information submitted in support of the LAR is under final review, and any additional information needed to support the LAR review will be formally requested by the NRC staff using the RAI process in accordance with Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-101, Revision 6, "License Amendment Review Procedures" (ML19248C539).

The regulatory audit is a planned license or regulation-related activity that includes the examination and evaluation of primarily non-docketed information. The regulatory audit is conducted with the intent to gain understanding, to verify information, and/or to identify information, that will require docketing to support the basis of a licensing or regulatory decision. Performing a regulatory audit of the licensee's information is expected to assist the NRC staff in efficiently conducting its review or gain insights on the licensee's processes or procedures. Information that the NRC staff relies upon to make the safety determination must be submitted on the docket. However, the NRC staff may review supporting information retained as records under Title 10 of the *Code of Federal Regulations* (10 CFR) section 50.71, "Maintenance of records, making of reports," and/or 10 CFR 54.37, "Additional records and recordkeeping

requirements,” which, although not required to be submitted as part of the licensing action, would help the NRC staff better understand the licensee’s submitted information.

## 2.0 SCOPE

By letter dated April 10, 2026, the NRC staff issued an audit plan. The audit plan was from April 6, 2026, to May 15, 2026. To support discussions, the NRC staff provided audit questions with items for Vistra OpsCo to clarify. Vistra OpsCo posted answers to these questions to the online portal. The NRC staff held clarification discussions with the Vistra OpsCo staff via Microsoft Teams. All audit questions were discussed. Technical discussions were focused on information supporting the licensee’s request to revise the PNPP TSs to relocate P/T limit curves to the PTLR.

## 3.0 TEAM ASSIGNMENTS

The NRC audit team included the following:

- Scott Wall, Plant Licensing Branch III (LPL3)
- Cory Parker, Vessels and Internals Branch (NVIB)
- John Tsao, NVIB
- John Budzynski, Nuclear Methods, Systems & New Reactors Branch (SNRB)
- Clint Ashley, Technical Specifications Branch (STSB)

## 4.0 DOCUMENT AND FILES REVIEWED

The NRC staff reviewed the following documents:

- Structural Integrity Associates Calculation No. 2400969.301 / 2400969.302, Revision 0, “Perry RPV Beltline ART and USE Calculation,” November 2024.
- SI Calculation No. 1300341.302, Revision 0, “Water Level Instrument Nozzle Fracture Mechanics Evaluation for Pressure-Temperature Limit Curve Development,” November 2014.
- SI Calculation No. 1300341.303, Revision 0, “Feedwater Nozzle Fracture Mechanics Evaluation for Pressure – Temperature Limit Curve Development,” November 2014.
- Structural Integrity Associates Calculation No. 1300341.304, Revision 1, “Perry Nuclear Power Plant Pressure-Temperature Limit Curve Calculations for 32 and 54 EFPY,” December 2015.
- Perry Nuclear Power Plant, “Pressure-Temperature Limit Report (PTLR) for 32 and 54 EFPY,” Revision 2, April 2026.

In addition to the documents listed above, the licensee response to the various audit questions was also included on the portal for NRC staff review.

## 5.0 RESULTS OF THE AUDIT

As a result of the audit, the NRC staff gained a better understanding of the licensee's analyses and calculations that provide the technical support for the LAR. The licensee provided a supplement on May 5, 2026 (ML26125A189).

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**ADAMS Accession Nos.:**

**Package: ML26126A003**

**Letter: ML26126A005**

**e-Concurrence Case: 20260506-10019**