



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 9, 1999

Mr. John K. Wood  
Vice President - Nuclear, Perry  
FirstEnergy Nuclear Operating Company  
P.O. Box 97, A200  
Perry, OH 44081

SUBJECT: COMPLETION OF LICENSING ACTION FOR GENERIC LETTER 98-04,  
"POTENTIAL FOR DEGRADATION OF THE EMERGENCY CORE COOLING  
SYSTEM AND THE CONTAINMENT SPRAY SYSTEM AFTER A LOSS-OF-  
COOLANT ACCIDENT BECAUSE OF CONSTRUCTION AND PROTECTIVE  
COATING DEFICIENCIES AND FOREIGN MATERIAL IN CONTAINMENT,"  
DATED JULY 14, 1998 - PERRY NUCLEAR POWER PLANT, UNIT 1  
(TAC NO. MA4084)

Dear Mr. Wood:

On July 14, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After a Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment," to all holders of operating licenses or construction permits. The NRC issued GL 98-04 to determine the status of containment coating programs.

In GL 98-04, the NRC staff specifically requested that the licensees provide information outlined below for each of their facilities.

- (1) A summary description of the plant-specific program or programs implemented to ensure that Service Level 1 protective coatings used inside the containment are procured, applied, and maintained in compliance with applicable regulatory requirements and the plant-specific licensing basis for the facility. Include a discussion of how the plant-specific program meets the applicable criteria of 10 CFR Part 50, Appendix B, as well as information regarding any applicable standards, plant-specific procedures or other guidance used for (a) controlling the procurement of coatings and paints used at the facility; (b) the qualification testing of protective coatings; and (c) surface preparation, application, surveillance, and maintenance activities for protective coatings. Maintenance activities refer to rework of degraded coatings, removing degraded coatings to sound coatings, correctly preparing the surfaces, applying new coating, and verifying the quality of coatings.
- (2) Information demonstrating compliance with item (i) or item (ii).
  - (i) For plants with licensing-basis requirements for tracking the amount of unqualified coatings inside the containment and for assessing the impact of potential coating debris on the operation of safety-related systems, structures, and components (SSCs) during a postulated design basis loss-of-coolant accident (DB LOCA), the following information shall be provided to demonstrate compliance:

NRC FILE CENTER GUY

DF01

- (a) The date and findings of the last assessment of coatings and the planned date of the next assessment of coatings.
  - (b) The limit for the amount of unqualified protective coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
  - (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility.
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46b(5), "Long-term cooling" and the functional capability of the safety-related containment spray system (CSS) as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable. The following information shall be provided:

If a commercial-grade dedication program is not being used at your facility for qualifying and dedicating commercial-grade coatings for Service Level 1 applications, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

Your letter of November 11, 1998 (PY-CEI/NRR-2336L), responded to GL 98-04 for the Perry Nuclear Power Plant, Unit 1. Clarification was provided during a phone call that took place on October 20, 1999. The staff has reviewed your response and has concluded that all requested information has been provided; therefore, we consider GL 98-04 to be closed for your facility. We thank you for your prompt and complete response.

If you have any questions regarding this matter, please contact me at 301-415-1364.

Sincerely,

Original signed by:  
 Douglas V. Pickett, Senior Project Manager, Section 2  
 Project Directorate III  
 Division of Licensing Project Management  
 Office of Nuclear Reactor Regulation

Docket No. 50-440

cc: See next page

DISTRIBUTION:

FILE CENTER	RPulsifer	ESullivan	SBajwa
PUBLIC	CLauron	AMendiola	PDIII-2:LA
PDIII-2 r/f	JDavis	DPickett	GGrant, RIII

DOCUMENT NAME: G:\PDIII-2\PERRY\GL98-04CLOSEOUT.WPD

INDICATE IN BOX: "C"=COPY W/O ATTACHMENT/ENCLOSURE, "E"=COPY W/ATT/ENCL, "N"=NO COPY

OFFICE	PDIII-2:PM	C	PDIII-2:LA	N	SC:EMCB	SC:PDIII-2
NAME	DPickett		JDL		ESullivan	AMendiola
DATE	11/5/99		11/5/99		11/8/99	11/9/99

November 9, 1999

- (a) The date and findings of the last assessment of coatings and the planned date of the next assessment of coatings.
  - (b) The limit for the amount of unqualified protective coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
  - (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility.
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46b(5), "Long-term cooling" and the functional capability of the safety-related containment spray system (CSS) as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable. The following information shall be provided:

If a commercial-grade dedication program is not being used at your facility for qualifying and dedicating commercial-grade coatings for Service Level 1 applications, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

Your letter of November 11, 1998 (PY-CEI/NRR-2336L), responded to GL 98-04 for the Perry Nuclear Power Plant, Unit 1. Clarification was provided during a phone call that took place on October 20, 1999. The staff has reviewed your response and has concluded that all requested information has been provided; therefore, we consider GL 98-04 to be closed for your facility. We thank you for your prompt and complete response.

If you have any questions regarding this matter, please contact me at 301-415-1364.

Sincerely,

Original signed by:  
 Douglas V. Pickett, Senior Project Manager, Section 2  
 Project Directorate III  
 Division of Licensing Project Management  
 Office of Nuclear Reactor Regulation

Docket No. 50-440

cc: See next page

DISTRIBUTION:

FILE CENTER	RPulsifer	ESullivan	SBajwa
PUBLIC	CLauron	AMendiola	PDIII-2:LA
PDIII-2 r/f	JDavis	DPickett	GGrant, RIII

DOCUMENT NAME: G:\PDIII-2\PERRY\GL98-04CLOSEOUT.WPD

INDICATE IN BOX: "C"=COPY W/O ATTACHMENT/ENCLOSURE, "E"=COPY W/ATT/ENCL, "N"=NO COPY

OFFICE	PDIII-2:PM	C	PDIII-2:LA	N	SC:EMCB	SC:PDIII-2
NAME	DPickett		JL		ESullivan	AMendiola
DATE	11/5/99		11/5/99		11/8/99	11/9/99

OFFICIAL RECORD COPY

- (a) The date and findings of the last assessment of coatings and the planned date of the next assessment of coatings.
  - (b) The limit for the amount of unqualified protective coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
  - (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility.
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46b(5), "Long-term cooling" and the functional capability of the safety-related containment spray system (CSS) as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable. The following information shall be provided:

If a commercial-grade dedication program is not being used at your facility for qualifying and dedicating commercial-grade coatings for Service Level 1 applications, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

Your letter of November 11, 1998 (PY-CEI/NRR-2336L), responded to GL 98-04 for the Perry Nuclear Power Plant, Unit 1. Clarification was provided during a phone call that took place on October 20, 1999. The staff has reviewed your response and has concluded that all requested information has been provided; therefore, we consider GL 98-04 to be closed for your facility. We thank you for your prompt and complete response.

If you have any questions regarding this matter, please contact me at 301-415-1364.

Sincerely,



Douglas V. Pickett, Senior Project Manager, Section 2  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-440

cc: See next page

J. Wood  
FirstEnergy Nuclear Operating Company

Perry Nuclear Power Plant, Units 1 and 2

cc:

Mary E. O'Reilly  
FirstEnergy Corporation  
76 South Main St.  
Akron, OH 44308

James R. Williams, Executive Director  
Ohio Emergency Management Agency  
2855 West Dublin Granville Road  
Columbus, OH 43235-7150

Resident Inspector's Office  
U.S. Nuclear Regulatory Commission  
P.O. Box 331  
Perry, OH 44081-0331

Mayor, Village of Perry  
P.O. Box 100  
Perry, OH 44081-0100

Regional Administrator, Region III  
U.S. Nuclear Regulatory Commission  
801 Warrenville Road  
Lisle, IL 60532-4531

Radiological Health Program  
Ohio Department of Health  
P.O. Box 118  
Columbus, OH 43266-0118

Sue Hiatt  
OCRE Interim Representative  
8275 Munson  
Mentor, OH 44060

Ohio Environmental Protection  
Agency  
DERR--Compliance Unit  
ATTN: Mr. Zack A. Clayton  
P.O. Box 1049  
Columbus, OH 43266-0149

Gregory A. Dunn  
Manager - Regulatory Affairs  
FirstEnergy Nuclear Operating Company  
Perry Nuclear Power Plant  
P.O. Box 97, A210  
Perry, OH 44081

Chairman  
Perry Township Board of Trustees  
3750 Center Road, Box 65  
Perry, OH 44081

William R. Kanda, Jr., Plant Manager  
FirstEnergy Nuclear Operating Company  
Perry Nuclear Power Plant  
P.O. Box 97, SB306  
Perry, OH 44081

State of Ohio  
Public Utilities Commission  
East Broad Street  
Columbus, OH 43266-0573

Mayor, Village of North Perry  
North Perry Village Hall  
4778 Lockwood Road  
North Perry Village, OH 44081

Donna Owens, Director  
Ohio Department of Commerce  
Division of Industrial Compliance  
Bureau of Operations & Maintenance  
6606 Tussing Road  
P. O. Box 4009  
Reynoldsburg, OH 43068-9009