



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

November 22, 1999

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

SUBJECT SAFETY EVALUATION OF THE INSERVICE INSPECTION PROGRAM
SECOND 10-YEAR INTERVAL REQUESTS FOR RELIEF FOR FIRSTENERGY
NUCLEAR OPERATING COMPANY - PERRY NUCLEAR POWER PLANT,
UNIT 1 (TAC NO. MA3437)

Dear Mr. Wood:

By letters dated August 26, 1998 (PY-CEI/NRR-2310L), March 24, 1999 (PY-CEI/NRR-2378L), and August 10, 1999 (PY-CEI/NRR-2422L), FirstEnergy Nuclear Operating Company submitted its updated Inservice Examination Program for the Perry Nuclear Power Plant, Unit 1 (PNPP). In accordance with 10 CFR 50.55a(g)(4)(ii), the Inservice Examination Program complies with the requirements of the latest edition and addenda of the American Society of Mechanical Engineers (ASME) Code incorporated by reference into Title 10 of the Code of Federal Regulations (10 CFR) Section 50.55a(b) 12 months prior to the start of the second 120-month interval. The staff has reviewed the information submitted concerning the Inservice Inspection (ISI) Program request for relief from ASME Code, Section XI, requirements. The Code of record for the PNPP second 10-year ISI interval, which began November 18, 1998, is the 1989 Edition of ASME Code, Section XI.

The relief requests were reviewed against the requirements of the 1989 Edition of ASME Code, Section XI, for piping and components. Relief is granted from or alternatives are authorized to the inspection requirements which have been determined to be impractical to perform, where an alternative provides an acceptable level of quality and safety, or where compliance would result in a hardship or unusual difficulty without a compensating increase in quality or safety.

With the exception of Relief Request IR-023, the requests for relief were reviewed with technical assistance from the Idaho National Engineering and Environmental Laboratory (INEEL). Relief Request IR-023, on hydraulic and mechanical snubbers, was reviewed separately by the staff. The staff's safety evaluation (SE) for IR-023 is provided in Enclosure 1. The staff's SE for the remaining requests for relief is provided in Enclosure 2. A summary of the Nuclear Regulatory Commission's approval or denial on each relief request is provided in Enclosure 3, Table 1, "Summary of Relief Requests." The staff has adopted the evaluations and recommendations for granting relief or authorizing alternatives as contained in INEEL's Technical Letter Report, which is provided in Enclosure 4.

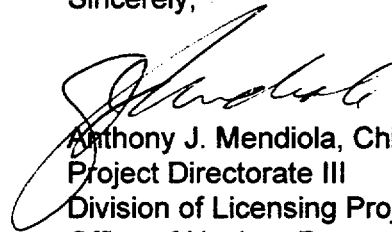
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Relief may be granted for IR-002, IR-004, IR-005, IR-007, IR-009, IR-012, IR-013, IR-015, IR-018, IR-019, and IR-024 pursuant to 10 CFR 50.55a(g)(6)(i) for the remainder of the second 10-year interval. In making this determination, the staff considered the impracticality of performing the required inspections and the burden on the licensee if the Code requirements were imposed. The alternatives proposed in relief requests IR-023, PT-001 and PT-006 may be authorized pursuant to 10 CFR 50.55a(a)(3)(i) on the basis that it provides an acceptable level of quality and safety. The alternatives proposed in the relief requests IR-001, IR-021, IR-025, IR-026, IR-027, IR-029, IR-042, IR-043, and PT-007 may be authorized pursuant to 10 CFR 50.55a(3)(ii) on the basis that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety. Your letter of March 24, 1999, withdrew Relief Request PT-008.

The ISI program relief requests which are granted or authorized herein are acceptable for implementation for the second 10-year interval. The granting of relief is based upon the fulfillment of any commitments made by the licensee in the basis for each relief request and the alternatives proposed.

Sincerely,



Anthony J. Mendiola, Chief, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-440

Enclosures: 1. Safety Evaluation for Relief Request IR-023
2. Safety Evaluation for Inservice Inspection Program, Second 10-Year Interval
3. Table 1, "Summary of Relief Requests"
4. INEEL Technical Letter Report

cc w/encls: See next page

J. Wood
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Perry Nuclear Power Plant, Units 1 and 2

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The ISI program relief requests which are granted or authorized herein are acceptable for implementation for the second 10-year interval. The granting of relief is based upon the fulfillment of any commitments made by the licensee in the basis for each relief request and the alternatives proposed.

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Original signed by:
 Anthony J. Mendiola, Chief, Section 2
 Project Directorate III
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 Office of Nuclear Reactor Regulation

Docket No. 50-440

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