



**CENTERIOR
ENERGY**

PERRY NUCLEAR POWER PLANT

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VICE PRESIDENT - NUCLEAR

March 15, 1991
PY-CEI/NRR-1314 L

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Perry Nuclear Power Plant
Docket No. 50-440
Approval Request -
Reactor Vessel Material Surveillance
Program - Withdrawal Schedule

Gentlemen:

By letter PY-CEI/NRR-1313L, dated 3/15/91, a supplement to a Technical Specification change request was filed in order to relocate the Reactor Vessel Material Surveillance Program - Withdrawal Schedule to the Updated Safety Analysis Report (USAR) in accordance with Generic Letter 91-01. This relocation is justified since the withdrawal schedule is controlled in accordance with Federal Regulations in 10CFR50 Appendix H (Paragraph II.B.3), which requires NRC approval prior to implementing a revised schedule. A new proposed schedule is attached, in the USAR Section 5.3.1.6.1 format which we propose to retain it. Where Effective Full Power Years (EFPY) do not coincide with refuel outages, withdrawal will be at the preceding outage.

The technical justification for this proposed withdrawal schedule is Table 1 of ASTM E185-82, as referenced in 10CFR50 Appendix H. The original schedule was based on ASTM E185-73 (vessel purchase order 3/23/73), which originally provided for two surveillance capsules and a standby. Case A of Table 1 was used because less than a 100°F transition temperature shift was predicted at that time.

Using the most recent regulatory guidance (RG 1.99 Rev. 2, 5/88) to calculate transition temperature shift, a shift of 110°F at end of life is now predicted. This analysis is reported in letter PY-CEI/NRR-1314L, dated 9/14/90. ASTM E185-82 would require 4 capsules removed at 3, 6, 15 and 32 effective full-power years. The 3 year withdrawal is based on reaching 5E22 n/cm² neutron fluence at the capsule, or a 50°F temperature shift. Since our specimen will not experience that fluence or temperature shift that soon, we have selected our 3 capsule schedule to coincide with capsule withdrawals at 6, 15, and 32 EFPY. The Perry surveillance capsule fluence and temperature shift at 6 and 15 EFPY are consistent with E185-82 limits on fluence and temperature shift.

Operating Companies
Cleveland Electric Illuminating
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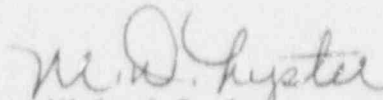
We also request to designate the 32 EFPY (end-of-life) capsule as a standby, for possible changes in extended life surveillance if we elect to apply for license renewal.

This withdrawal schedule was originally included in a more extensive Technical Specification Change Request for Regulatory Guide 1.99 Rev. 2 implementation (PY-CEI/NRR-1188L, 9/14/90). At that time we concluded the change to this schedule did not involve a significant hazard, and that the proposed change met the criteria in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

To remain consistent with the related Technical Specification Change Request in our letters PY-CEI/NRR-1188L and 1313L, we are requesting your approval of the attached Schedule changes when the referenced Amendment is issued. The withdrawal schedule contained in the USAR, Section 5.3.1.6.1 will be revised at the next USAR update following NRC approval of this withdrawal schedule.

If you have any questions, please feel free to call.

Sincerely,


Michael D. Lyster

MDL:WJE:njc

Attachment

cc: NRC Project Manager
NRC Resident Inspector Office
NRC Region III
State of Ohio

Proposed USAR Text for Surveillance Capsule Withdrawal Schedule;
USAR Section 5.3.1.6.1, Page 5.3-9

The proposed withdrawal schedule is in accordance with 10CFR50, Appendix H:

Unit 1

First capsule:	6 Effective Full-Power Years (EFPY)
Second capsule:	15 EFPY
Third capsule:	Standby