CENTERIOR ENERGY

PERRY NUCLEAR POWER PLANT
10 CENTER ROAD
PERRY, OHIO 44081
(216) 259-3737

Mail Address:
P.O. BOX 97
PERRY, OHIO 44081

Michael D. Lyster
Vice President - Nuclear

August 10, 1990
PY-CEI/NRR-1208 L

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

Perry Nuclear Power Plant
Docket No. 50-440
CEI Response to NRC Request for
Additional Information re
Inservice Inspection Relief Requests

Gentlemen:

By letter dated June 13, 1990, the NRC staff requested additional information regarding Perry Nuclear Power Plant (PNPP) Inservice Inspection Relief Requests PT-001, PT-002, PT-003 and IR-017 in order to complete a review of eleven relief requests submitted by the Cleveland Electric Illuminating Company (CEI) via letter PY-CEI/NRR-1078L dated November 17, 1989.

Based upon a telephone conversation with the NRC Staff and its contractor EG&G on July 13, 1990, CEI has revised Relief Requests PT-001, PT-002 and PT-003 to provide more detailed information, and has withdrawn Relief Request IR-017. In addition, CEI hereby withdraws Relief Request IR-016. Attachment 1 contains the revised relief requests and Attachment 2 contains a summary of the reasons for the relief request withdrawals.

Attachment 3 provides clarification of the relief requested in Preservice Relief Request #11 (and subsequently resubmitted as Inservice Relief Request IR-009) with regard to the NRC staff's evaluation in Appendix Q of the Perry SSER No. 7.

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

Sincerely,

Frank R Stead for

Michael D. Lyster

MDL:CJF:njc

Attachment

cc: NRR Project Manager
Sr. Resident Inspector
USNRC Region III
EG&G Idaho, Inc.

A097
1/1

Perry Nuclear Power Plant Unit 1
RELIEF REQUEST #PT-001
Page 1 of 8

I. Identification of Components

Class 2 systems/components attached to the Reactor Coolant Pressure Boundary (Class 1) which are not provided with either pressure or test isolation (i.e., instrumentation, drain, vent, and test piping). A list of valve numbers identifies the affected components (i.e., valves, piping systems and instruments).

II. ASME B&PV Section XI Requirements

IWA-5213(c) Test Condition Holding Time, "System Inservice Tests - no holding time required, provided the system has been in operation for at least 4 hours."

IWC-5210(a)(2) Test, "A system pressure test conducted during a system inservice test [IWA-5211(c)] for those systems required to operate during normal plant operation."

III. Relief Request

Relief is requested from using the requirement of - operating the system for four hours before commencing the VT-2 examinations - for Class 2 components and instruments non-isolable from the Reactor Coolant Pressure Boundary (Class 1). These components shall be examined (VT-2 Visual Examination) during the Class 1 Reactor Coolant Boundary System Leakage Pressure Test at the frequency intervals specified within Subsection IWC. Thus, this relief request proposes substituting IWA-5213(a) for IWA-5213(c) and IWB-5210(a)(1) for IWC-5210(a)(2).

IV. Basis for Relief

Numerous components attached to the reactor coolant pressure boundary are covered by the provisions of 10CFR50.55a(c) Reactor Coolant Pressure Boundary. The following excerpt from 10CFR50a(c) is provided:

"(2) Components which are connected to the reactor coolant system and are part of the reactor coolant pressure boundary as defined in Section 50.2 need not meet the requirements of paragraph (c)(1) of this section, Provided:

(i) In the event of postulated failure of the component during normal reactor operation, the reactor can be shut down and cooled down in an orderly manner, assuming makeup is provided by the reactor coolant makeup system; or

(ii) The component is or can be isolated from the reactor coolant system by two valves in series (both closed, both open, or one closed and the other open). Each open valve must be capable of automatic actuation and, assuming the other valve is open, its closure time must be such that, in the event of postulated failure of the component during normal reactor operation, each valve remains operable and the reactor can be shut down and cooled down in an orderly manner, assuming makeup is provided by the reactor coolant makeup system only."

The piping systems and their associated components connected to the reactor coolant pressure boundary and less than 1 inch in diameter were constructed to the requirements of ASME Code, Section III, Subsection NC, and identified as Safety Class 2 for inservice inspection. The associated components and component parts are identified by valve number and listed below. These piping systems shall be pressurized during the Class 1 reactor coolant pressure boundary System Leakage Pressure Test and a VT-2 Visual Examination will be performed. The System Leakage Pressure Test frequency and pressure will be that required for a Class 2 System Inservice Test. Although the system will not have been in operation for four hours prior to commencing the examinations, the time required to bring the reactor coolant system up to test pressure will allow for the detection of leakage.

Within ASME Section XI the test conditions (i.e., pressure, temperature and hold time) between the reactor coolant pressure boundary and other safety systems are different. Although there are differences, all the system pressure tests ensure leak tightness. Therefore, the substitution of IWA-5213(a) for IWA-5213(c) and the substitution of IWB-5210(a)(1) for IWC-5210(a)(2) satisfies the intent of the Code.

V. Alternate Examination

N/A, VT-2 Visual Examination is performed.

Valve No.	Description	P&ID No.
1B33-F068A/B	Recirc Pump A/B Discharge Valve Vent	D-302-601, 602
1B33-F070A/B	Recirc Pump A/B Discharge Valve Drain	D-302-601, 602
1B33-F065A/B	Recirc Loop A/B FCV Drain	D-302-601, 602
1B33-F647A/B	Recirc Loop A/B FCV Vent	D-302-601, 602
1B33-F686A/B	Recirc Loop A/B FCV Drain	D-302-601, 602

Perry Nuclear Power Plant Unit 1
RELIEF REQUEST #PT-001
Page 3 of 8

Valve No.	Description	P&ID No.
1B33-F025A/B	Recirc Pump A/B Suction Valve Vent	D-302-601, 602
1B33-F027A/B	Recirc Pump A/B Suction Valve Drain	D-302-601, 602
1B33-F503A/B -F504A/B	Instrument Isolation Valves for dPT-N015A/B, Respectively	D-302-602
1B33-F505A -F506A	Instrument Isolation Valves for FT-N014C/D	D-302-602
1B33-F505B -F506B	Instrument Isolation Valves for FT-N011B and FT-N024C/D	D-302-602
1B33-F507A -F508A	Instrument Isolation Valves for FT-N011A and FT-N014A/B	D-302-602
1B33-F507B -F508B	Instrument Isolation Valves for FT-N024A/B	D-302-602
1B33-F512A/B	Recirc Pump A/B Diff Pressure Instrument Vent	D-302-602
1B33-F513A/B	Recirc Pump A/B Diff Pressure Instrument Vent	D-302-602
1B33-F577	Recirc Loop B Flow Instrument Vent	D-302-602
1B33-F578	Recirc Loop B Flow Instrument Vent	D-302-602
1B33-F579	Recirc Loop A Flow Instrument Vent	D-302-602
1B33-F580	Recirc Loop A Flow Instrument Vent	D-302-602
1B33-F581	Recirc Loop B Flow Instrument Vent	D-302-602
1B33-F582	Recirc Loop B Flow Instrument Vent	D-302-602
1B33-F583	Recirc Loop A Flow Instrument Vent	D-302-602
1B33-F584	Recirc Loop A Flow Instrument Vent	D-302-602
1B33-F059	Recirc System Sample Isolation	D-302-602
1B33-F019	Reactor Water Sample Isolation	D-302-602
1B33-F110	Rx Recirc Sample Line Drain	D-302-602
1G33-F507	Instrument Isolation Valve for FT-N037	D-302-671
1G33-F523	RWCU Bottom Head Flow Instrument Vent	D-302-671
1E32-F506A -F544A	Instrument Isolation Valves for PT-N051A, PT-N061A	D-302-341
1E32-F506E -F544E	Instrument Isolation Valves for PT-N051E, PT-N061E	D-302-341
1E32-F506J -F544J	Instrument Isolation Valve for PT-N051J, PT-N061J	D-302-341
1E32-F506N -F544N	Instrument Isolation Valve for PT-N051N PT-N061N	D-302-341
1B21-F596	1B21-F016 Test Connection Root Valve	D-302-121
1B21-F017	MST Drain and MSIV Bypass Line Drain	D-302-121
1N27-F551A/B/C	Feedwater Header A Branch Test Isolation	D-302-082
1N27-F551D/E/F	Feedwater Header B Branch Test Isolation	D-302-082
1N27-F557A/B	Feedwater Header A/B First Test Connection	D-302-082
1G33-F508A/B	Instrument Isolation Valves for PT-N076A, PT-N076B	D-302-671, 962

Perry Nuclear Power Plant Unit 1
RELIEF REQUEST #PT-001
Page 4 of 8

Valve No.	Description	P&ID No.
1G33-F108	Pen 131 INBD Test Conn First Isolation Valve	D-302-671
1E31-F540B	RWCU Diff Flow LD Low Side Test Connection	D-302-962
1E31-F541B	RWCU Diff Flow LD High Side Test Connection	D-302-962
1E51-F528A/B/C/D	Instrument Isolation Valves for PT-N084A/B, PT-N085A/B	D-302-632, 961
1E31-F542A/B	RCIC/RHR ST Supply LD Low Stby Test Conn	D-302-961
1E31-F543A/B	RCIC/RHR ST Supply LD High Stby Test Conn	D-302-961
1E31-N084B-G	Cross-Tie Low Side PT-N084A/B	D-302-961
1E31-N084B-R	Cross-Tie High Side PT-N084A/B	D-302-961
1E31-F519	Instrument Isolation Valve For PT-N080A	D-302-705, 962
1E31-F545A	RHR A to LPCS LD High Side Test Connection	D-302-962
1E31-F523	Instrument Isolation Valve for PT-N081	D-302-701, 962
1E31-F547	HPCS to SLC Ref Diff Pressure Test Connection	D-302-962
1E31-F520	Instrument Isolation Valve for PT-N080A	D-302-642, 962
1E31-F544A	RHR A to LPCS LD Low Side Test Connection	D-302-962
1E31-F521	Instrument Isolation Valve for PT-N080B	D-302-642, 962
1E31-F522	Instrument Isolation Valve for PT-N080B	D-302-642, 962
1E21-F502	LPCS to Rx Line Test Connection	D-302-705
1E22-F501	HPCS to Rx Line Test connection	D-302-701
1C41-F501	SLC Discharge Line Inboard Drywell Drain Vlv	D-302-691
1E12-F508A	LPCI From RHR A Inbd First Test Connection	D-302-642
1E12-F508B	LPCI From RHR B Inbd First Test Connection	D-302-642
1E12-F508C	LPCI From RHR C Inbd First Test Connection	D-302-642
1E12-F501	Shutdown Cooling Suction Hdr Inbd First Conn	D-302-642
1E51-F072	RHR & RCIC Steam Supply Line Test Connection	D-302-632
1B33-F514	Recirc Jet Pump 15 Flow Instrument Vent	D-302-604
1B33-F515	Recirc Jet Pump 12 Flow Instrument Vent	D-302-604
1B33-F516	Recirc Jet Pump 18 Flow Instrument Vent	D-302-604
1B33-F517	Recirc Jet Pump 19 Flow Instrument Vent	D-302-604
1B33-F518	Recirc Jet Pump 15 Flow Instrument Vent	D-302-604
1B33-F519	Recirc Jet Pump 16 Flow Instrument Vent	D-302-604
1B33-F520	Recirc Jet Pump 17 Flow Instrument Vent	D-302-604
1B33-F521	Recirc Jet Pump 11 Flow Instrument Vent	D-302-604
1B33-F522	Recirc Jet Pump 13 Flow Instrument Vent	D-302-604
1B33-F523	Recirc Jet Pump 20 Flow Instrument Vent	D-302-604
1B33-F524	Recirc Jet Pump 20 Flow Instrument Vent	D-302-604
1B33-F525	Recirc Jet Pump 14 Flow Instrument Vent	D-302-604
1B33-F526	Recirc Jet Pump 15 Flow Instrument Root FT-N038B, LT-N044D	D-302-604
1B33-F527	Recirc Jet Pump 12 Flow Instrument Root FT-N037F	D-302-604

Perry Nuclear Power Plant Unit 1
RELIEF REQUEST #PT-001
Page 5 of 8

Valve No.	Description	P&ID No.
1B33-F528	Recirc Jet Pump 18 Flow Instrument Root FT-N037M	D-302-604
1B33-F529	Recirc Jet Pump 19 Flow Instrument Root FT-N037S	D-302-604
1B33-F530	Recirc Jet Pump 15 Flow Instrument Root FT-N037U, FT-N038B	D-302-604
1B33-F531	Recirc Jet Pump 16 Flow Inst Root FT-N037D	D-302-604
1B33-F532	Recirc Jet Pump 17 Flow Inst Root FT-N037H	D-302-604
1B33-F533	Recirc Jet Pump 11 Flow Inst Root FT-N037B	D-302-604
1B33-F534	Recirc Jet Pump 13 Flow Inst Root FT-N037K	D-302-604
1B33-F535	Recirc Jet Pump 20 Flow Inst Root FT-N038D	D-302-604
1B33-F536	Recirc Jet Pump 20 Flow Inst Root FT-N037W, FT-N038D	D-302-604
1B33-F537	Recirc Jet Pump 14 Flow Inst Root FT-N037P	D-302-604
1B33-F646	Jet Pump Post Accident Sample Isolation	D-302-604
1P87-F001	Reactor Recirc B Sample Isolation Valve	D-302-431
1B33-F538	Recirc Jet Pump 7 Flow Instrument Vent	D-302-603
1B33-F539	Recirc Jet Pump 9 Flow Instrument Vent	D-302-603
1B33-F540	Recirc Jet Pump 10 Flow Instrument Vent	D-302-603
1B33-F541	Recirc Jet Pump 1 Flow Instrument Vent	D-302-603
1B33-F542	Recirc Jet Pump 2 Flow Instrument Vent	D-302-603
1B33-F543	Recirc Jet Pump 5 Flow Instrument Vent	D-302-603
1B33-F544	Recirc Jet Pump 3 Flow Instrument Vent	D-302-603
1B33-F545	Recirc Jet Pump 10 Flow Instrument Vent	D-302-603
1B33-F546	Recirc Jet Pump 5 Flow Instrument Vent	D-302-603
1B33-F547	Recirc Jet Pump 4 Flow Instrument Vent	D-302-603
1B33-F548	Recirc Jet Pump 6 Flow Instrument Vent	D-302-603
1B33-F549	Recirc Jet Pump 8 Flow Instrument Vent	D-302-603
1B33-F550	Recirc Jet Pump 7 Flow Instrument Root FT-N037G	D-302-603
1B33-F551	Recirc Jet Pump 9 Flow Instrument Root FT-N037R	D-302-603
1B33-F552	Recirc Jet Pump 10 Flow Instrument Root FT-N037V, FT-N038C	D-302-603
1B33-F553	Recirc Jet Pump 1 Flow Instrument Root FT-N037A	D-302-603
1B33-F554	Recirc Jet Pump 2 Flow Instrument Root FT-N037E	D-302-603
1B33-F555	Recirc Jet Pump 5 Flow Instrument Root FT-N038A, LT-N044C	D-302-603
1B33-F556	Recirc Jet Pump 3 Flow Instrument Root FT-N037J	D-302-603

Perry Nuclear Power Plant Unit 1
RELIEF REQUEST #PT-001
Page 6 of 8

Valve No.	Description	P&ID No.
1B33-F557	Recirc Jet Pump 10 Flow Instrument Root FT-N038C	D-302-603
1B33-F558	Recirc Jet Pump 5 Flow Instrument Root FT-N037T, FT-N038A	D-302-603
1B33-F559	Recirc Jet Pump 4 Flow Instrument Root FT-N037N	D-302-603
1B33-F560	Recirc Jet Pump 6 Flow Instrument Root FT-N037C	D-302-603
1B33-F561	Recirc Jet Pump 8 Flow Instrument Root FT-N037L	D-302-603
1B33-F570	Jet Pump Flow Instrument Vent	D-302-603
1B33-F571	Jet Pump Flow Instrument Isolation FT-N037G, FT-N037R, FT-N037V, FT-N037A, FT-N037E, FT-N037J, FT-N037T, FT-N037N, FT-N037C, FT-N037L	D-302-603
1B33-F645	Jet Pump Post Accident Sample Isolation	D-302-603
1P87-F007	Reactor Recirc A Sample Isolaton Valve	D-302-431
1E31-F503 -F504	Instrument Isolation Valves for PT-N003A, PT-N086A, PT-N086B	D-302-961
1E31-F505 -F506	Instrument Isolation Valves for PT-N086C, PT-N086D	D-302-961
1E31-F507 -F508	Instrument Isolation Valves for PT-N003B, PT-N087A, PT-N087B	D-302-961
1E31-F509 -F510	Instrument Isolation Valves for PT-N087C, PT-N087D	D-302-961
1E31-F570	Main Steam Line A Flow Instrument Test Conn	D-302-961
1E31-F571	Main Steam Line A Flow Instrument Test Conn	D-302-961
1E31-F572	Main Steam Line A Flow Instrument Test Conn	D-302-961
1E31-F573	Main Steam Line A Flow Instrument Test Conn	D-302-961
1E31-F574	Main Steam Line B Flow Instrument Test Conn	D-302-961
1E31-F575	Main Steam Line B Flow Instrument Test Conn	D-302-961
1E31-F576	Main Steam Line B Flow Instrument Test Conn	D-302-961
1E31-F577	Main Steam Line B Flow Instrument Test Conn	D-302-961
1E31-F511 -F512	Instrument Isolation Valves for PT-N088A, PT-N088B	D-302-961
1E31-F513 -F514	Instrument Isolation Valves for PT-N003C, PT-N088C, PT-N088D	D-302-961
1E31-F515 -F516	Instrument Isolation Valves for PT-N089A, PT-N089B	D-302-961
1E31-F517 -F518	Instrument isolation Valves for PT-N003D, PT-N089C, PT-N089D	D-302-961
1E31-F578	Main Steam Line C Flow Instrument Test Conn	D-302-961
1E31-F579	Main Steam Line C Flow Instrument Test Conn	D-302-961

Perry Nuclear Power Plant Unit 1
RELIEF REQUEST #PT-001
Page 7 of 8

Valve No.	Description	P&ID No.
1E31-F580	Main Steam Line C Flow Instrument Test Conn	D-302-961
1E31-F581	Main Steam Line C Flow Instrument Test Conn	D-302-961
1E31-F582	Main Steam Line D Flow Instrument Test Conn	D-302-961
1E31-F583	Main Steam Line D Flow Instrument Test Conn	D-302-961
1E31-F584	Main Steam Line D Flow Instrument Test Conn	D-302-961
1E31-F585	Main Steam Line D Flow Instrument Test Conn	D-302-961
1B21-F512	Instrument Isol Valve for LT-N027, LT-N017	D-302-606
1B21-F514	Instrument Isol Valve for LT-N095B, PT-N403B, PI-R004B, PT-N058, PT-N403F, PT-N068B, PT-N008B, PT-N068F, PT-N040, PT-N078B, PT-N062B, PT-N004B, LT-N080B, LT-N490, LT-N091B, LT-N402B, LT-N091F, dPI-R009B, LT-N081B	D-302-606
1B21-F510	Instrument Isolation Valve for PT-N078D, LT-N080D, LT-N073L, LT-N073R, LT-N081D, LT-N402F, LT-N044D	D-302-606
1B21-F542	RPV Level Instrument Line Drain	D-302-606
1B21-F511	Instrument Isolation Valve for LT-N080D, dPI-R005	D-302-606
1B21-F544	RPV Level Instrument Line Vent	D-302-606
1B21-F546	RPV Level Instrument Line Drain	D-302-606
1B21-F515	Instrument Isolation Valve for LT-N080B, LT-N004, LT-N017, LT-N027, LT-N095B	D-302-606
1B21-F551	RPV Level Instrument Line Vent	D-302-606
1B21-F540	RPV Level Instrument Line Drain	D-302-606
1B21-F545	RPV Level Instrument Line Vent	D-302-606
1B21-F509	Instrument Isolation Valve for LT-N073L, LT-N073R, LT-N081D, LT-N402F	D-302-606
1B21-F548	RPV Level Instrument Line Drain	D-302-606
1B21-F549	RPV Level Instrument Line Vent	D-302-606
1B21-F513	Instrument Isolation Valve for LT-N081B, LT-N091F, dPI-R009B, LT-N402B, LT-N091B	D-302-606
1B21-F583	Instrument Isolation Valve for PT-N081, dPT-N032	D-302-606, 962
1B21-F582	Jet Pump Instrument Line Vent	D-302-606
1B21-F585	Instrument Isolation Valve For dPT-N011, dPT-N008	D-302-606, 872
1B21-F523	Instrument Isolation Valve for Flow Instruments P009, dPI-R005, LT-N490, dPT-N032, FT-N037, FT-N032, dPI-R005	D-302-606, 604, 671
1B21-F584	Jet Pump Instrument Line Vent	D-302-606

Perry Nuclear Power Plant Unit 1
RELIEF REQUEST #PT-001
Page 8 of 8

Valve No.	Description	P&ID No.
1B21-F553	Instrument Isolation Valve for LT-N095A, PT-N403A, PI-R004A, PT-N403E, PT-N005, PT-N068A, PT-N050, PT-N068E, PT-N006, PT-N008A, PT-N078A, PT-N062A, LT-N004A, LT-N080A, LT-N010, LT-N091A, LT-N402A, dPI-R009A, LT-N091E, LT-N081A	D-302-606
1B21-F505	Instrument Isolation Valves for LT-N080C, PT-N078C, LT-N004C, LT-N073G, LT-N402E, LT-N073C, LT-N081C, LT-N044C	D-302-606
1B21-F536	RPV Level Instrument Line Drain	D-302-606
1B21-F506	Instrument Isolation Valve for LT-N080C, LT-N004C	D-302-606
1B21-F539	RPV Level Instrument Line Vent	D-302-606
1B21-F528	RPV Level Instrument Line Drain	D-302-606
1B21-F552	Instrument Isolation Valve for LT-N080A, LT-N004A, LT-N095A	D-302-606
1B21-F533	RPV Level Instrument Line Vent	D-302-606
1B21-F535	RPV Level Instrument Line Drain	D-302-606
1B21-F504	Instrument Isolation Valves for LT-N081C, LT-N073C, LT-N402E, LT-N073G	D-302-606
1B21-F534	RPV Level Instrument Line Vent	D-302-606
1B21-F529	RPV Level Instrument LIne Drain	D-302-606
1B21-F555	Instrument Isolation Valve for LT-N081A, LT-N091E, dPI-R009A, LT-N402A, LT-N091A, LT-N010	D-302-606
1B21-F531	RPV Level Instrument Line Vent	D-302-606

Perry Nuclear Power Plant Unit 1
RELIEF REQUEST #PT-002
Page 1 of 8

I. Identification of Components

Class 2 systems/components attached to the Reactor Coolant Pressure Boundary (Class 1) which are not provided with either pressure or test isolation (i.e., instrumentation, drain, vent, and test piping). A list of valve numbers identifies the affected components (i.e., valves, piping systems and instruments).

II. ASME B&PV Section XI Requirements

IWC-5210(a)(3) Test, "A system hydrostatic pressure test [IWA-5211(d)] for each system or portion of systems and for repaired or replaced components, or altered portions of systems."

IWC-5222(a) System Hydrostatic Test, "The system hydrostatic test pressure shall be at least 1.10 times the system pressure P_{SV} for systems with Design Temperature of 200°F or less, and at least 1.25 times the system pressure P_{SV} for systems with Design Temperature above 200°F. The system pressure P_{SV} shall be the lowest pressure setting among the number of safety or relief valves provided for overpressure protection within the boundary of the system to be tested. For systems (or portions of systems) not provided with safety or relief valves, the system design pressure P_d shall be substituted for P_{SV}".

III. Relief Requested

Relief is requested from using the Class 2 System Hydrostatic Pressure Test requirements for Class 2 components and instruments non-isolable from the Reactor Coolant Pressure Boundary (Class 1). These components shall be examined (VT-2 Visual Examination) during the Class 1 Reactor Coolant Pressure Boundary System Hydrostatic Pressure Test at the frequency intervals specified within Subsection IWB. Thus, this relief request proposes substituting IWB-5210(a)(2) for IWC-5210(a)(3) and IWB-5222/IWB-5230 for IWC-5222(a).

IV. Basis For Relief

Numerous components attached to the Reactor Coolant Pressure Boundary are covered by the provisions of 10CFR50.55a(c) Reactor Coolant Pressure Boundary. The following excerpt from 10CFR50.55a(c) is provided:

Perry Nuclear Power Plant Unit 1
RELIEF REQUEST #PT-002
Page 2 of 8

"(2) Components which are connected to the reactor coolant system and are part of the reactor coolant pressure boundary as defined in Section 50.2 need not meet the requirements of paragraph (c)(1) of this section, Provided:

(i) In the event of postulated failure of the component during normal reactor operation, the reactor can be shut down and cooled down in an orderly manner, assuming makeup is provided by the reactor coolant makeup system; or

(ii) The component is or can be isolated from the reactor coolant system by two valves in series (both closed, both open, or one closed and the other open). Each open valve must be capable of automatic actuation and, assuming the other valve is open, its closure time must be such that, in the event of postulated failure of the component during normal reactor operation, each valve remains operable and the reactor can be shut down and cooled down in an orderly manner, assuming makeup is provided by the reactor coolant makeup system only."

The piping systems and their associated components less than 1 inch in diameter were constructed to the requirements of ASME Code, Section III, Subsection NC, and identified as Safety Class 2 for inservice inspection. The associated components and component parts are identified by valve number and listed below. These piping systems shall be pressurized during the Class 1 System Hydrostatic Pressure Test and a VT-2 Visual Examination will be performed. The frequency and hold time of the system hydrostatic pressure tests are identical for Class 1 and Class 2.

Within ASME Section XI the test conditions (i.e., pressure and temperature) between the reactor coolant pressure boundary and other safety systems are different. The Class 1 test pressure has a maximum limit of 1127.5 psig (Reference: Table IWB-5222-1, Test Pressure) with the Class 2 having its minimum test pressure at 1379 psig (Reference: IWC-5222(a) for design temperature greater than 200 degrees F). Because the piping systems and their associated components less than 1 inch in diameter for which relief is requested are non-isolable from the reactor coolant pressure boundary, and the maximum test pressure for the Class 1 reactor coolant pressure boundary System Hydrostatic Test is less than the minimum test pressure required for a Class 2 System Hydrostatic Test, hydrostatic testing of these Class 2 components is necessarily limited to the Class 1 System Hydrostatic Test pressure. Although there are differences, both the Class 1 and Class 2 hydrostatic pressure tests ensure structural integrity and leak tightness. Therefore, the substitution of IWB requirements for IWC satisfies the intent of the Code.

V. Alternate Examination

N/A, VT-2 Visual Examination is performed.

Perry Nuclear Power Plant Unit 1
RELIEF REQUEST #PT-002
Page 3 of 8

Valve No.	Description	P&ID No.
1B33-F068A/B	Recirc Pump A/B Discharge Valve Vent	D-302-601, 602
1B33-F070A/B	Recirc Pump A/B Discharge Valve Drain	D-302-601, 602
1B33-F065A/B	Recirc Loop A/B FCV Drain	D-302-601, 602
1B33-F647A/B	Recirc Loop A/B FCV Vent	D-302-601, 602
1B33-F686A/B	Recirc Loop A/B FCV Drain	D-302-601, 602
1B33-F025A/B	Recirc Pump A/B Suction Valve Vent	D-302-601, 602
1B33-F027A/B	Recirc Pump A/B Suction Valve Drain	D-302-601, 602
1B33-F503A/B -F504A/B	Instrument Isolation Valves for dPT-N015A/B, Respectively	D-302-602
1B33-F505A -F506A	Instrument Isolation Valves for FT-N014C/D	D-302-602
1B33-F505B -F506B	Instrument Isolation Valves for FT-N011B and FT-N024C/D	D-302-602
1B33-F507A -F508A	Instrument Isolation Valves for FT-N011A and FT-N014A/B	D-302-602
1B33-F507B -F508B	Instrument Isolation Valves for FT-N024A/B	D-302-602
1B33-F512A/B	Recirc Pump A/B Diff Pressure Instrument Vent	D-302-602
1B33-F513A/B	Recirc Pump A/B Diff Pressure Instrument Vent	D-302-602
1B33-F577	Recirc Loop B Flow Instrument Vent	D-302-602
1B33-F578	Recirc Loop B Flow Instrument Vent	D-302-602
1B33-F579	Recirc Loop A Flow Instrument Vent	D-302-602
1B33-F580	Recirc Loop A Flow Instrument Vent	D-302-602
1B33-F581	Recirc Loop B Flow Instrument Vent	D-302-602
1B33-F582	Recirc Loop B Flow Instrument Vent	D-302-602
1B33-F583	Recirc Loop A Flow Instrument Vent	D-302-602
1B33-F584	Recirc Loop A Flow Instrument Vent	D-302-602
1B33-F059	Recirc System Sample Isolation	D-302-602
1B33-F019	Reactor Water Sample Isolation	D-302-602
1B33-F110	Rx Recirc Sample Line Drain	D-302-602
1B33-F020	Reactor Water Sample Isolation	D-302-602
1B33-F021	Recirc System Sample Test Connection	D-302-602
1G33-F507	Instrument Isolation Valve for FT-N037	D-302-671
1G33-F523	RWCU Bottom Head Flow Instrument Vent	D-302-671
1E32-F506A -F544A	Instrument Isolation Valves for PT-N051A, PT-N061A	D-302-341
1E32-F506E -F544E	Instrument Isolation Valves for PT-N051E, PT-N061E	D-302-341
1E32-F506J -F544J	Instrument Isolation Valve for PT-N051J, PT-N061J	D-302-341
1E32-F506N -F544N	Instrument Isolation Valve for PT-N051N PT-N061N	D-302-341

Perry Nuclear Power Plant Unit 1
RELIEF REQUEST #PT-002
Page 4 of 8

Valve No.	Description	P&ID No.
1B21-F596	1B21-F016 Test Connection Root Valve	D-302-121
1B21-F017	MST Drain and MSIV Bypass Line Drain	D-302-121
1N27-F551A/B/C	Feedwater Header A Branch Test Isolation	D-302-082
1N27-F551D/E/F	Feedwater Header B Branch Test Isolation	D-302-082
1N27-F557A/B	Feedwater Header A/B First Test Connection	D-302-082
1G33-F508A/B	Instrument Isolation Valves for PT-N076A, PT-N076B	D-302-671, 962
1G33-F108	Pen 131 INBD Test Conn First Isolation Valve	D-302-671
1E31-F540B	RWCU Diff Flow LD Low Side Test Connection	D-302-962
1E31-F541B	RWCU Diff Flow LD High Side Test Connection	D-302-962
1E51-F528A/B/C/D	Instrument Isolation Valves for PT-N084A/B, PT-N085A/B	D-302-632, 961
1E31-F542A/B	RCIC/RHR ST Supply LD Low Stby Test Conn	D-302-632, 961
1E31-F543A/B	RCIC/RHR ST Supply LD High Stby Test Conn	D-302-632, 961
1E31-N084B-G	Cross-Tie Low Side PT-N084A/B	D-302-961
1E31-N084B-R	Cross-Tie High Side PT-N084A/B	D-302-961
1E31-F519	Instrument Isolation Valve For PT-N080A	D-302-705, 962
1E31-F545A	RHR A to LPCS LD High Side Test Connection	D-302-962
1E31-F523	Instrument Isolation Valve for PT-N081	D-302-701, 962
1E31-F547	HPCS to SLC Ref Diff Pressure Test Connection	D-302-962
1E31-F520	Instrument Isolation Valve for PT-N080A	D-302-642, 962
1E31-F544A	RHR A to LPCS LD Low Side Test Connection	D-302-962
1E31-F521	Instrument Isolation Valve for PT-N080B	D-302-642, 962
1E31-F522	Instrument Isolation Valve for PT-N080B	D-302-642, 962
1E21-F502	LPCS to Rx Line Test Connection	D-302-705
1E22-F501	HPCS to Rx Line Test connection	D-302-701
1C41-F501	SLC Discharge Line Inboard Drywell Drain Vlv	D-302-691
1E12-F508A	LPCI From RHR A Inbd First Test Connection	D-302-642
1E12-F508B	LPCI From RHR B Inbd First Test Connection	D-302-642
1E12-F508C	LPCI From RHR C Inbd First Test Connection	D-302-642
1E12-F501	Shutdown Cooling Suction Hdr Inbd First Conn	D-302-642
1E51-F072	RHR & RCIC Steam Supply Line Test Connection	D-302-632
1B33-F514	Recirc Jet Pump 15 Flow Instrument Vent	D-302-604
1B33-F515	Recirc Jet Pump 12 Flow Instrument Vent	D-302-604
1B33-F516	Recirc Jet Pump 18 Flow Instrument Vent	D-302-604
1B33-F517	Recirc Jet Pump 19 Flow Instrument Vent	D-302-604
1B33-F518	Recirc Jet Pump 15 Flow Instrument Vent	D-302-604
1B33-F519	Recirc Jet Pump 16 Flow Instrument Vent	D-302-604
1B33-F520	Recirc Jet Pump 17 Flow Instrument Vent	D-302-604
1B33-F521	Recirc Jet Pump 11 Flow Instrument Vent	D-302-604
1B33-F522	Recirc Jet Pump 13 Flow Instrument Vent	D-302-604
1B33-F523	Recirc Jet Pump 20 Flow Instrument Vent	D-302-604

Perry Nuclear Power Plant Unit 1
RELIEF REQUEST #PT-002
Page 5 of 8

Valve No.	Description	P&ID No.
1B33-F524	Recirc Jet Pump 20 Flow Instrument Vent	D-302-604
1B33-F525	Recirc Jet Pump 14 Flow Instrument Vent	D-302-604
1B33-F526	Recirc Jet Pump 15 Flow Instrument Root FT-N038B, LT-N044D	D-302-604
1B33-F527	Recirc Jet Pump 12 Flow Instrument Root FT-N037F	D-302-604
1B33-F528	Recirc Jet Pump 18 Flow Instrument Root FT-N037M	D-302-604
1B33-F529	Recirc Jet Pump 19 Flow Instrument Root FT-N037S	D-302-604
1B33-F530	Recirc Jet Pump 15 Flow Instrument Root FT-N037U, FT-N038B	D-302-604
1B33-F531	Recirc Jet Pump 16 Flow Inst Root FT-N037D	D-302-604
1B33-F532	Recirc Jet Pump 17 Flow Inst Root FT-N037H	D-302-604
1B33-F533	Recirc Jet Pump 11 Flow Inst Root FT-N037B	D-302-604
1B33-F534	Recirc Jet Pump 13 Flow Inst Root FT-N037K	D-302-604
1B33-F535	Recirc Jet Pump 20 Flow Inst Root FT-N038D	D-302-604
1B33-F536	Recirc Jet Pump 20 Flow Inst Root FT-N037W, FT-N038D	D-302-604
1B33-F537	Recirc Jet Pump 14 Flow Inst Root FT-N037P	D-302-604
1B33-F[illegible]46	Jet Pump Post Accident Sample Isolation	D-302-604
1P87-F001	Reactor Recirc B Sample Isolation Valve	D-302-431
1B33-F538	Recirc Jet Pump 7 Flow Instrument Vent	D-302-603
1B33-F539	Recirc Jet Pump 9 Flow Instrument Vent	D-302-603
1B33-F540	Recirc Jet Pump 10 Flow Instrument Vent	D-302-603
1B33-F541	Recirc Jet Pump 1 Flow Instrument Vent	D-302-603
1B33-F542	Recirc Jet Pump 2 Flow Instrument Vent	D-302-603
1B33-F543	Recirc Jet Pump 5 Flow Instrument Vent	D-302-603
1B33-F544	Recirc Jet Pump 3 Flow Instrument Vent	D-302-603
1B33-F545	Recirc Jet Pump 10 Flow Instrument Vent	D-302-603
1B33-F546	Recirc Jet Pump 5 Flow Instrument Vent	D-302-603
1B33-F547	Recirc Jet Pump 4 Flow Instrument Vent	D-302-603
1B33-F548	Recirc Jet Pump 6 Flow Instrument Vent	D-302-603
1B33-F549	Recirc Jet Pump 8 Flow Instrument Vent	D-302-603
1B33-F550	Recirc Jet Pump 7 Flow Instrument Root FT-N037G	D-302-603
1B33-F551	Recirc Jet Pump 9 Flow Instrument Root FT-N037R	D-302-603
1B33-F552	Recirc Jet Pump 10 Flow Instrument Root FT-N037V, FT-N038C	D-302-603
1B33-F553	Recirc Jet Pump 1 Flow Instrument Root FT-N037A	D-302-603

Perry Nuclear Power Plant Unit 1
RELIEF REQUEST #PT-002
Page 6 of 8

Valve No.	Description	P&ID No.
1B33-F554	Recirc Jet Pump 2 Flow Instrument Root FT-N037E	D-302-603
1B33-F555	Recirc Jet Pump 5 Flow Instrument Root FT-N038A, LT-N044C	D-302-603
1B33-F556	Recirc Jet Pump 3 Flow Instrument Root FT-N037J	D-302-603
1B33-F557	Recirc Jet Pump 10 Flow Instrument Root FT-N038C	D-302-603
1B33-F558	Recirc Jet Pump 5 Flow Instrument Root FT-N037T, FT-N038A	D-302-603
1B33-F559	Recirc Jet Pump 4 Flow Instrument Root FT-N037N	D-302-603
1B33-F560	Recirc Jet Pump 6 Flow Instrument Root FT-N037C	D-302-603
1B33-F561	Recirc Jet Pump 8 Flow Instrument Root FT-N037L	D-302-603
1B33-F570	Jet Pump Flow Instrument Vent	D-302-603
1B33-F571	Jet Pump Flow Instrument Isolation FT-N037G, FT-N037R, FT-N037V, FT-N037A, FT-N037E, FT-N037J, FT-N037T, FT-N037N, FT-N037C, FT-N037L	D-302-603
1B33-F645	Jet Pump Post Accident Sample Isolation	D-302-603
1P87-F007	Reactor Recirc A Sample Isolaton Valve	D-302-431
1E31-F503 -F504	Instrument Isolation Valves for PT-N003A, PT-N086A, PT-N086B	D-302-961
1E31-F505 -F506	Instrument Isolation Valves for PT-N086C, PT-N086D	D-302-961
1E31-F507 -F508	Instrument Isolation Valves for PT-N003B, PT-N087A, PT-N087B	D-302-961
1E31-F509 -F510	Instrument Isolation Valves for PT-N087C, PT-N087D	D-302-961
1E31-F570	Main Steam Line A Flow Instrument Test Conn	D-302-961
1E31-F571	Main Steam Line A Flow Instrument Test Conn	D-302-961
1E31-F572	Main Steam Line A Flow Instrument Test Conn	D-302-961
1E31-F573	Main Steam Line A Flow Instrument Test Conn	D-302-961
1E31-F574	Main Steam Line B Flow Instrument Test Conn	D-302-961
1E31-F575	Main Steam Line B Flow Instrument Test Conn	D-302-961
1E31-F576	Main Steam Line B Flow Instrument Test Conn	D-302-961
1E31-F577	Main Steam Line B Flow Instrument Test Conn	D-302-961
1E31-F511 -F512	Instrument Isolation Valves for PT-N088A, PT-N088B	D-302-961
1E31-F513 -F514	Instrument Isolation Valves for PT-N003C, PT-N088C, PT-N088D	D-302-961

Perry Nuclear Power Plant Unit 1
RELIEF REQUEST #PT-002
Page 7 of 8

Valve No.	Description	P&ID No.
1E31-F515 -F516	Instrument Isolation Valves for PT-N089A, PT-N089B	D-302-961
1E31-F517 -F518	Instrument isolation Valves for PT-N003D, PT-N089C, PT-N089D	D-302-961
1E31-F578	Main Steam Line C Flow Instrument Test Conn	D-302-961
1E31-F579	Main Steam Line C Flow Instrument Test Conn	D-302-961
1E31-F580	Main Steam Line C Flow Instrument Test Conn	D-302-961
1E31-F581	Main Steam Line C Flow Instrument Test Conn	D-302-961
1E31-F582	Main Steam Line D Flow Instrument Test Conn	D-302-961
1E31-F583	Main Steam Line D Flow Instrument Test Conn	D-302-961
1E31-F584	Main Steam Line D Flow Instrument Test Conn	D-302-961
1E31-F585	Main Steam Line D Flow Instrument Test Conn	D-302-961
1B21-F512	Instrument Isol Valve for LT-N027, LT-N017	D-302-606
1B21-F514	Instrument Isol Valve for LT-N095B, PT-N403B, PI-R004B, PT-N058, PT-N403F, PT-N068B, PT-N008B, PT-N068F, PT-N040, PT-N078B, PT-N062B, PT-N004B, LT-N080B, LT-N490, LT-N091B, LT-N402B, LT-N091F, dPI-R009B, LT-N081B	D-302-606
1B21-F510	Instrument Isolation Valve for PT-N078D, LT-N080D, LT-N073L, LT-N073R, LT-N081D, LT-N402F, LT-N044D	D-302-606
1B21-F542	RPV Level Instrument Line Drain	D-302-606
1B21-F511	Instrument Isolation Valve for LT-N080D, dPI-R005	D-302-606
1B21-F544	RPV Level Instrument Line Vent	D-302-606
1B21-F546	RPV Level Instrument Line Drain	D-302-606
1B21-F515	Instrument Isolation Valve for LT-N080B, LT-N004, LT-N017, LT-N027, LT-N095B	D-302-606
1B21-F551	RPV Level Instrument Line Vent	D-302-606
1B21-F540	RPV Level Instrument Line Drain	D-302-606
1B21-F545	RPV Level Instrument Line Vent	D-302-606
1B21-F509	Instrument Isolation Valve for LT-N073L, LT-N073R, LT-N081D, LT-N402F	D-302-606
1B21-F548	RPV Level Instrument Line Drain	D-302-606
1B21-F549	RPV Level Instrument Line Vent	D-302-606
1B21-F513	Instrument Isolation Valve for LT-N081B, LT-N091F, dPI-R009B, LT-N402B, LT-N091B	D-302-606
1B21-F583	Instrument Isolation Valve for PT-N081, dPT-N032	D-302-606, 962
1B21-F582	Jet Pump Instrument Line Vent	D-302-606
1B21-F585	Instrument Isolation Valve For dPT-N011, dPT-N008	D-302-606, 872

Perry Nuclear Power Plant Unit 1
RELIEF REQUEST #PT-002
Page 8 of 8

Valve No.	Description	P&ID No.
1B21-F523	Instrument Isolation Valve for Flow Instruments P009, dPI-R005, LT-N490, dPT-N032, FT-N037, FT-N032, dPI-R005	D-302-606, 604, 671
1B21-F584	Jet Pump Instrument Line Vent	D-302-606
1B21-F553	Instrument Isolation Valve for LT-N095A, PT-N403A, PI-R004A, PT-N403E, PT-N005, PT-N068A, PT-N050, PT-N068E, PT-N006, PT-N008A, PT-N078A, PT-N062A, LT-N004A, LT-N080A, LT-N010, LT-N091A, LT-N402A, dPI-R009A, LT-N091E, LT-N081A	D-302-606
1B21-F505	Instrument Isolation Valves for LT-N080C, PT-N078C, LT-N004C, LT-N073G, LT-N402E, LT-N073C, LT-N081C, LT-N044C	D-302-606
1B21-F536	RPV Level Instrument Line Drain	D-302-606
1B21-F506	Instrument Isolation Valve for LT-N080C, LT-N004C	D-302-606
1B21-F539	RPV Level Instrument Line Vent	D-302-606
1B21-F528	RPV Level Instrument Line Drain	D-302-606
1B21-F552	Instrument Isolation Valve for LT-N080A, LT-N004A, LT-N095A	D-302-606
1B21-F533	RPV Level Instrument Line Vent	D-302-606
1B21-F535	RPV Level Instrument Line Drain	D-302-606
1B21-F504	Instrument Isolation Valves for LT-N081C, LT-N073C, LT-N402E, LT-N073G	D-302-606
1B21-F534	RPV Level Instrument Line Vent	D-302-606
1B21-F529	RPV Level Instrument LIne Drain	D-302-606
1B21-F555	Instrument Isolation Valve for LT-N081A, LT-N091E, dPI-R009A, LT-N402A, LT-N091A, LT-N010	D-302-606
1B21-F531	RPV Level Instrument Line Vent	D-302-606

Perry Nuclear Power Plant
RELIEF REQUEST #PT-003
Page 1 of 3

I. Identification of Components

Class 2 and 3 components which undergo routine quantitative pressurization tests in which no detectable leakage would be identified as the minimum equipment accuracy (i.e., normally inclusive of valves, piping systems and penetrations). A listing of test pressurization boundaries are identified by penetration number.

II. ASME B&PV Section XI Requirements

IWA-5211 Test Description, "The pressure retaining components within each system boundary shall be subject to system pressure tests under which conditions visual examination VT-2 is performed in accordance with IWA-5240 to detect leakages. The required system pressure tests and examinations, as referenced in Table IWA-5210-1, may be conducted in conjunction with one or more of the following system tests or operations: "(b) a system functional test, (d) a system hydrostatic test, and (e) a system pneumatic test.

IWA-2500(a) Examination and Pressure Test Requirements, "Components shall be examined and pressure tested as specified in Table IWC-2500-1. The method of examination for the components and parts of the pressure retaining boundaries shall comply with those tabulated in Table IWC-2500-1, except where alternate examination methods are used that meet the requirements of IWA-2240."

IWC-5210(a) Test, "The pressure retaining components within each system boundary shall be subjected to the following system pressure tests and visually examined by the method specified in Table IWC-2500-1, Examination Category C-4: "(1) a system pressure test conducted during a system functional test, and (3) a system hydrostatic pressure test.

IWC-5210(b) Test, "The system pressure tests and visual examinations shall be conducted in accordance with IWA-5000 and this Article. The contained fluid in the system shall serve as the pressurizing medium, except that in steam system either water or air may be used. Where air is used, the test procedure shall permit the detection and location of through-wall leakages in components of the system tested."

Perry Nuclear Power Plant
RELIEF REQUEST #PT-003
Page 2 of 3

IWD-2500(a) Examination and Pressure Test Requirements, "Components shall be examined and pressure tested as specified in Table IWD-2500-1. The method of examination for the components and parts of the pressure retaining boundaries shall comply with those tabulated in Table IWD-2500-1 except where alternate examination methods are used that meet the requirements of IWA-2240."

IWD-5210(a) Test, "The pressure retaining components within the boundary of each system specified in the Examination Categories of Table IWD-2500-1 shall be pressure tested and examined in accordance with Table IWD-2500-1 during the following tests:" "(2) system functional test, IWA-5211(b); (3) system hydrostatic test, IWA-5211(d)."

III. Relief Requested

Relief is requested from performance of VT-2 Visual Examination in conjunction with a system pressure test where the test pressurization boundary leakage is measured (makeup or pressure decay) and quantified as within the test equipment accuracy (no detectable leakage). The test pressurization boundaries are identified by penetration numbers. The boundary includes components and appurtenances which become pressurized during testing.

IV. Basis For Relief

Numerous Class 2 and 3 components undergo leak testing using the pressure make-up or pressure decay techniques. These tests require the measurement and quantification of the test pressurization boundary leakage. Performance of a VT-2 Examination would require walkdowns and may involve scaffolding erection in radiation areas. Pressure testing using air could additionally require insulation removal (and re-installation) for detecting leakage by VT-2 Visual Examination. The use of an alternative technique of no detectable leakage meets the ALARA policy at PNPP. The majority of pressure tests are to satisfy plant Technical Specifications for verifying plant component operability and structural integrity. The test equipment used to satisfy Technical Specifications has an accuracy and range unique to verify major safety concerns. The quantification as no detectable leakage is documented as minimum equipment accuracy (i.e., 20 sccm or 4.8 ml/min). The performance of a VT-2 Visual Examination during testing would not serve a useful purpose if no detectable leakage exists. Non-performance of the VT-2 visual examination would benefit ALARA without impacting on component reliability.

Perry Nuclear Power Plant
RELIEF REQUEST #PT-003
Page 3 of 3

V. Alternate Examination

Quantifying leakage rates as no detectable leakage utilizing test instruments (calibrated equipment), rather than a VT-2 walkdown, is used as an alternative technique.

Pen. No.	Designation	P&ID No.
P107	RHR Relief Line to Suppression Pool	D-302-641, 642, 705, 971
P108	Condensate Supply	D-302-102
P109	Containment Leak Test	D-302-811
P111	Condensate Return	D-302-102
P114	Containment Vacuum Relief	D-912-606
P115	RCIC Turbine Exhaust Vacuum Relief	D-302-631, 641, 642, 643
P117	Nitrogen Supply to CRD's	D-302-950
P118	RHR Heat Exchanger Vent	D-302-641, 642
P119	Containment Leak Rate	D-302-811
P120	Containment Leak Rate	D-302-811
P201	Drywell Atmosphere Radiation Monitor Line	D-806-004
P203	Fuel Pool Cooling Supply	D-302-651
P208	Containment Vacuum Relief	D-912-606
P210	Carbon Dioxide To Fire Protection System	D-914-005
P301	Fuel Pool Cooling Return	D-302-651
P302	Backup Hydrogen Purge System	D-302-831
P305	Lower Personnel Airlock	D-302-761
P309	Demineralized Water	D-302-713
P312	Upper Personnel Airlock	D-302-761
P317	Containment Atmosphere Radiation Monitor Line	D-806-007
P317	Containment Leak Rate	D-302-811
P318	Post LOCA Hydrogen Analyzer Line	D-302-431, 832
P319	Containment Leak Rate	D-302-811
P406	Fire Protection Water	D-914-003
P413	Post Accident Sampling	D-302-431
P417	Eqiupment Drain Sump to Radwaste	D-302-739
P418	Floor Drain Sump to Radwaste	D-302-740
P420	Backwash Tank to Radwaste	D-302-737
P424	RWCU to Main Condenser and Radwaste	D-302-672
P425	Post LOCA Hydrogen Analyzer Line	D-302-832
P428	Containment Vacuum Relief	D-912-606
P429	RHR Relief Line to Suppression Pool	D-302-431, 642, 643
P431	RHR Heat Exchanger Vent	D-302-642, 643
P436	Containment Vacuum Relief	D-912-606
V313	Purge Supply	D-912-604
V314	Purge Exhaust	D-912-604

Withdrawal of Inservice Relief Requests IR-016 and IR-017

CEI has determined it necessary to withdraw/delete Inservice Relief Requests IR-016 and IR-017 submitted to the NRC by letter PY-CEI/NRR-1208L on November 17, 1989. Discussion of the relief requests and the reasons for their withdrawal are as follows:

Relief Request IR-016

Inservice Relief Request IR-016 was submitted to request relief from 100% volumetric examination of the reactor head spray nozzle to vessel weld (1B13-N8-KA) and nozzle inner radius (1-B13-N8-IR). The volumetric examinations are required by ASME XI, Examination Category B-D, Items No.'s B3.90 and B3.100 respectively. As reported in Preservice Relief Request #1, the exams are limited by the close proximity of the adjacent N-7 nozzle. Prior to Perry's first refuel, the NRC requested that Inservice Relief Requests, for known limitations, be submitted for the first interval. Inservice Relief Request IR-001, submitted to the NRC by letter PY-CEI/NRR-0919L, listed the head spray nozzle exams on page 8 of 9 of the relief request. The head spray nozzle exams were scheduled for, and performed, during Perry's first refueling outage. Following the outage, not realizing that relief had already been requested, Relief Request IR-016 was prepared in error. It should also be noted that the completion percentage reported for the inner radius exam in IR-016 (83%) was calculated in error and the completion percentage reported in IR-001 (94%) is correct.

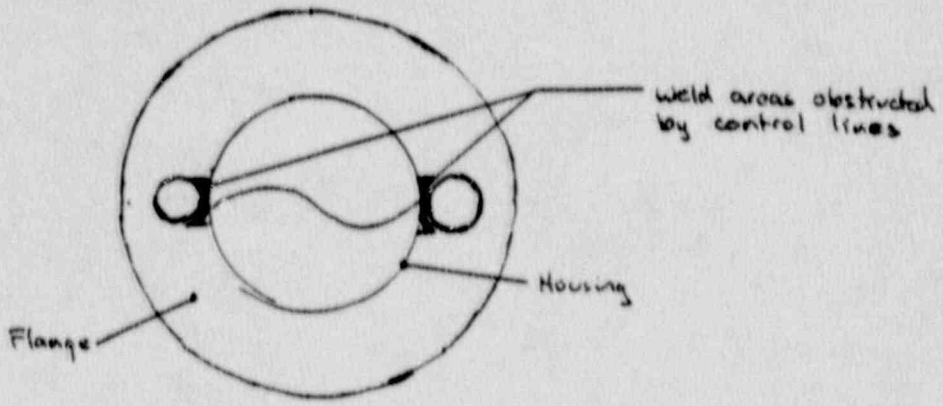
Relief Request IR-017

Relief Request IR-017 was prepared in error to report limited Augmented IGSCC examination of 4 stainless steel welds (1B13-N9A-KC, 1B13-N9B-KC, 1B33-0008 and 1B33-0107). All four welds have joint geometry which precludes two sided ultrasonic examinations and must therefore be examined from one-side only. Generic Letter 88-01 requires that the examinations performed on these welds should comply with he ASME Code, Section XI and that the detailed procedure, equipment and examination personnel shall be qualified in accordance with the NDE Coordination Plan implemented at the EPRI NDE Center. The Code requires 2 directional angle beam coverage of the weld required volume (inner 1/3T). The exams performed achieved the required coverage by utilizing 5/8ths-V calibrations and extrapolating the DAC to cover the examination volume. The equipment, procedure (all essential variables) and personnel were all qualified in accordance with NDE Coordination Plan at the EPRI NDE Center. In addition to the procedures/techniques required by the Code and employed by EPRI at the NDE Center, Perry procedures call for supplemental examination angles (70°) and a half-V examination from both sides of the weld. The limitation reported in Relief Request IR-017 was thus only a site specific requirement. No relief from Code requirements is necessary and the augmented requirements of Generic Letter 88-01 are being met.

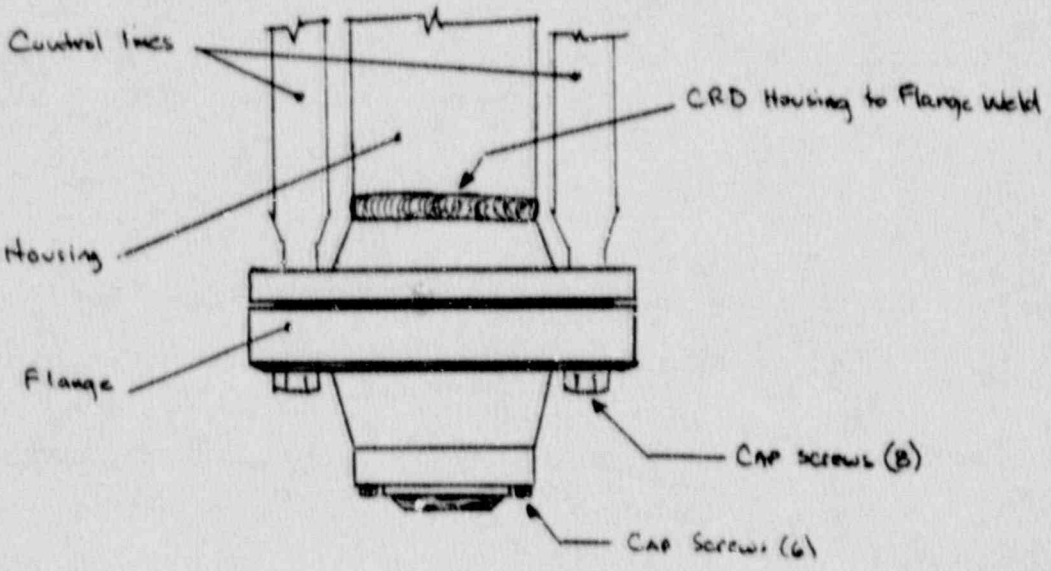
Clarification of Pre-Service Relief Request #11

CEI has also determined the need to clarify the relief requested in Preservice Relief Request #11 (and subsequently resubmitted as Inservice Relief Request #IR-009) with regard to the staff's (NRC) evaluation in Appendix Q of the Perry SSER No. 7. Relief from 100% surface examination of the Code required examination area was requested for the CRD housing flange welds. The surface examinations are required by ASME XI, Examination Category B-O, Item No. B14.10. The relief is necessary as 15% of the surface examination area of each housing to flange weld is inaccessible due to obstruction by the control (inlet and withdraw) lines (see Attachment 3, page 2 of 2). The control lines closely parallel the CRD housing and are welded into the CRD flanges. The staff concluded that "removal of the installed CRD support structure" solely for the purpose of performing the required surface examination was not necessary, but should the CRDH's be "disassembled" for inservice repair or maintenance, such that the subject welds are accessible, the surface examinations would be required to be performed at that time. The CRD mechanisms are routinely disassembled for in-service repair or maintenance, but the disassembly does not provide access to the portions of the CRD housing to flange weld obstructed by the control lines. The Staff approval of the Inservice Relief Request #IR-009 transmitted by letter dated April 25, 1990 did not specifically repeat this requirement. However, we commit that in the event the control lines would be removed for repair or maintenance, the required examination will be performed.

NJC/CODED/3678



OVERHEAD VIEW



SIDE VIEW