



Power Generation Group

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Lew W. Myers
Vice President

May 30, 1997
PY-CEI/NRR-2174L

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Perry Nuclear Power Plant
Docket No. 50-440
Follow-up Response to Generic Letter 96-06, "Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions"

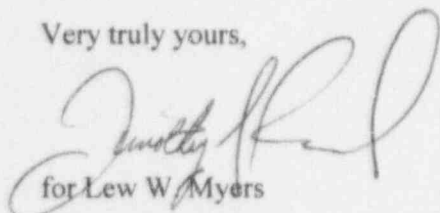
Ladies and Gentlemen:

Generic Letter (GL) 96-06, "Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions," requested licensees to evaluate their plant design and submit, within 120 days of the date of the GL, a written summary report stating actions taken in response to the requested actions, conclusions reached relative to the issues discussed in the GL, the basis for continued operability of affected systems and components, and corrective actions that were implemented or are planned to be implemented. The written summary report for the Perry Nuclear Power Plant was submitted to the Nuclear Regulatory Commission in a letter dated January 28, 1997 (PY-CEI/NRR-2132L). That letter stated that the details of the final resolution to GL 96-06 would be provided by May 31, 1997.

Attachment I to this letter provides the status of final resolution to the GL 96-06 issues and identifies regulatory commitments being made in this letter.

If you have questions or require additional information, please contact Mr. Henry L. Hegrat, Manager - Regulatory Affairs, at (216) 280-5606.

Very truly yours,



for Lew W. Myers

KMN:sc

Attachment 030120

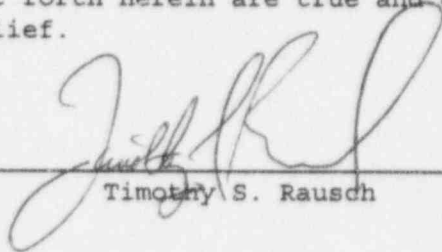
cc: NRC Project Manager
NRC Resident Inspector
NRC Region III

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A07211

I, Timothy S. Rausch, being duly sworn state that (1) I am Acting Director, Perry Nuclear Services Department of The Cleveland Electric Illuminating Company, (2) I am duly authorized to execute and file this certification on behalf of the Cleveland Electric Illuminating Company and Toledo Edison Company, and as the duly authorized agent for Duquesne Light Company, Ohio Edison Company, and Pennsylvania Power Company, and (3) the statements set forth herein are true and correct to the best of my knowledge, information and belief.



Timothy S. Rausch

Sworn to and subscribed before me, the 30th day of May,
1997.



LINDA J. BOSIACKI
Notary Public, State of Ohio
My Commission Expires April 23, 2001
(Recorded in Lake County)

BACKGROUND

Generic Letter (GL) 96-06, "Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions," dated September 30, 1996, requested licensees to evaluate their plant design and determine: (1) if containment air cooler cooling water systems are susceptible to either waterhammer or two-phase flow conditions during postulated accident conditions, and (2) if piping systems that penetrate the containment are susceptible to thermal expansion of fluid so that overpressurization of piping could occur. The response to these requested actions was submitted to the Nuclear Regulatory Commission (NRC) for the Perry Nuclear Power Plant (PNPP) in a letter dated January 28, 1997 (PY-CEI/NRR-2132L), as supplemented by a letter dated March 14, 1997 (PY-CEI/NRR-2146L).

The response to requested action (1) concluded that the potential exists for two-phase flow in the Drywell Cooling System; however, since the accident analyses do not place reliance on heat removal by this non-safety system, evaluation has concluded that the existence of two-phase flow in the system is of no safety significance. Therefore, there is no need for corrective actions to address waterhammer or two-phase flow conditions during postulated accident conditions.

The response to requested action (2) discussed eleven penetrations. Two of the containment penetrations are potentially susceptible to the thermal expansion of fluid such that overpressurization could occur. These two penetrations have been analyzed and determined to be operable based on Appendix F of Section III of the ASME Code. Nine other penetrations were also discussed in the response to requested action (2), for which potential thermal expansion of fluid would be relieved only through known leakage past the isolation valves. In addition, the response stated that the details of the final resolution to GL 96-06 would be provided by May 31, 1997. These are provided below.

RESOLUTION FOR GL 96-06

Plans to modify the designs of the eleven identified penetrations are being developed. The modifications will ensure protection of the penetrations from overpressurization concerns. Further engineering review of containment penetrations is ongoing to ensure there are no other susceptible penetrations beyond the eleven previously identified.

Pending availability of qualified components, the modifications to the designs of the two penetrations that have been analyzed as acceptable based on Appendix F of Section III of the ASME Code will be implemented during the sixth refueling outage (RFO6), currently scheduled for September 12 through October 21, 1997. Development of the design modification packages for these two penetrations has been given priority over the packages for the other nine penetrations. Initial contact with vendors of ASME Class 2 components indicates that there is a long lead time for procurement of the materials needed to complete the modifications. The issues related to GL 96-06 will be fully resolved no later than startup following the seventh refueling outage (RFO7).

The bases for continued operability of the affected systems and components, previously provided to the NRC in letters dated January 28, 1997, and March 14, 1997, remain valid for

the eleven affected containment penetrations until completion of the design modifications. Any RFO6 local leak rate test results relating to these penetrations will be evaluated to determine impact on the current operability conclusions.

COMMITMENTS

The following table identifies those actions which are considered to be regulatory commitments. Any other actions discussed in this document represent intended or planned actions, are described for the NRC's information, and are not regulatory commitments. Please notify the Manager - Regulatory Affairs at the Perry Nuclear Power Plant of any questions regarding this document or any associated regulatory commitments.

Commitments

Plans to modify the design of the eleven identified penetrations are being developed. The modifications will ensure protection of the penetrations from overpressurization concerns.

Pending availability of qualified components, the modifications on the two penetrations that have been analyzed as acceptable based on Appendix F of Section III of the ASME Code will be implemented during the sixth refueling outage (RFO6), currently scheduled for September 12 through October 21, 1997.

The issues related to GL 96-06 will be fully resolved no later than startup following the seventh refueling outage (RFO7).

Any RFO6 local leak rate test results relating to these penetrations will be evaluated to determine impact on the current operability conclusions.
