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Al Kaplan

VICE PRESIDENT
NUCLEAR GROUP

October 11, 1989
PY-CEI/NRR-1071 L

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

Perry Nuclear Power Plant
Docket No. 50-440
Response to Notices of
Violation 50-440/89022-03
and 50-440/89022-15 and
Open Item 50-440/89022-20

Gentlemen:

This letter acknowledges receipt of the Notices of Violation contained within Inspection Report 50-440/89022, dated September 11, 1989. This report identified areas examined by Mr. P. Hiland during his inspection conducted from August 7-23, 1989 of our response to the Diagnostic Evaluation Team report.

Our response to Notices of Violation 50-440/89022-03 and 50-440/89022-15, and Open Item 50-440/89022-20 is attached, please call should you have any additional questions.

Very truly yours,

Al Kaplan
Vice President
Nuclear Group

AK:njc

Attachment

cc: T. Colburn
P. Hiland
R.C. Knop - USNRC, Region III

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PDR ADOCK 05000440
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50-440/89022-03
Restatement of Violation

10 CFR 50, Appendix B, Criterion XVI requires in part that measures shall be established to assure conditions adverse to quality are promptly identified and corrected.

Contrary to the above:

On October 19, 1988, the licensee responded to Notice of Violation 50-440/88012-02 concerning failure to comply with Administrative Controls for overtime hours of unit staff pursuant to Technical Specification 6.2.2.a stating that adequate corrective action had been taken to prevent recurrence. As detailed in the Diagnostic Evaluation Teams Report for the Perry Nuclear Power Plant dated May 1989, Section 3.2.2, a licensee audit identified 9 instances between June and November 1988 where administrative controls were not adhered to. In addition, licensee audit 89-12, Action Request 0002, dated July 13, 1989, identified continued failure to adhere to administrative controls for overtime hours of unit staff personnel.

This is a Severity Level IV Violation (Supplement 1) (50-440/89022-03 (DRP)).

Corrective Actions to Avoid Further Violations

Operations Section became aware of these deficiencies during a followup review of the effectiveness of previous corrective actions on this subject. Immediate actions included a management memorandum to the Shift Supervisors instructing them to investigate the possible violations for their crew. Quality Auditing documented this in their Action Request 89-12-0002, which in turn resulted in this violation. In order to prevent recurrence, a revision to Plant Administrative Procedure (PAP-110) "Shift Staffing and Overtime" was approved which further clarifies the identified items, especially the use of Overtime Deviations. This revision stresses that only under unusual circumstances should deviations from the overtime guidelines be permitted. It details who will complete the Overtime Deviation Requests and who has the authorization to approve these deviations. Personnel affected by this revision will be informed of these changes through the procedure revision training process. Additionally, all managers and first line supervisors will be trained to the violation and the lessons learned from this event.

Date of Full Compliance

Full compliance will be achieved with the effective date of December 12, 1989 to this revision of PAP-0110.

50-440/89022-15
Restatement of Violation

10 CFR 50, Appendix B, Criterion V requires in part that activities affecting quality shall be accomplished in accordance with instructions.

Contrary to the above:

On February 20, 1989, the licensee failed to correctly perform Surveillance Instruction (SVI)-M16-T2001 which resulted in an inadequate test. The details of this violation are contained in the Diagnostic Evaluation Team Report for the Perry Nuclear Power Plant dated May 1989, Section 3.4.1.

This is a Severity Level IV Violation (Supplement I) (50-440/89002-15(DKP))

Correction Actions Taken and Results Achieved

This SVI was reperformed and correctly completed prior to the exit of the Diagnostic Team. This item was evaluated in accordance with the Condition Report process. SVI-M16-T2001 was revised per Condition Report 89-086 to clarify the conditions for a satisfactory Position Indication Test (PIT). The operator involved was counseled on the performance of SVI's.

Correction Actions to Avoid Further Violations

Plant Administrative Procedure (PAP-1101) "Inservice Testing of Pumps and Valves" currently contains directions for a satisfactory valve position verification. In order to further clarify the requirement and to prevent recurrence, the Responsible System Engineers will perform a comprehensive review of the Pump and Valve Inservice Testing Instructions, during which the directions contained in PAP-1101 will be explicitly included in the individual SVI.

During operator training this Notice of Violation will be discussed. Operators will be reminded that remote position verification as defined in PAP-1101, is by actual stem position or other local indicator physically connected to the stem.

Date of Full Compliance

Full compliance will be achieved through the processing of the instruction revisions, to be completed by April 4, 1990.

50/440-89022-20
Restatement of Open Item

As detailed in Section 3.6.1.3. of the DET inspection report, the inspectors expressed a concern that, since selected areas in the Nuclear Engineering and Plant Technical departments relied heavily on contractor support, a rapid reduction in contractor support could adversely impact the licensee's ability to accomplish engineering support tasks. The licensee's response to this item stated that a five year plan was under development and that any reductions in staffing size would be consistent with the goals of that five year plan. The inspectors advised the licensee that their response to this item was general in nature and did not explicitly discuss actions that would be taken to minimize the impact of rapid contractor support reduction. The inspectors requested and the licensee agreed to provide an additional response to this item. The subject of contractor support is considered an Open Item (550/89022-20(CRP)) pending receipt and the inspector's review of the requested additional information.

Diagnostic Evaluation Team Response

A five year plan for the Perry Plant is under development. As part of this effort, a detailed five year plan for engineering support is being developed. The staffing levels in both the Perry Plant Technical Department and the Nuclear Engineering Department will be adjusted as necessary to support the five year plan. Any reductions in staffing size will be consistent with the goals of the five year plan.

Additional Response

It is the responsibility of the Managers/Directors to ensure the necessary staff and qualifications to meet ANSI 18.1 requirements. As part of the detailed five year plan for engineering support many actions are being taken to minimize the impact of contractor reduction. Specifically, permanent plant positions for selected contractor personnel are being considered. Additionally, through the career opportunities program personnel will be evaluated for assignment to areas where their expertise can be better utilized. Some contractor staff will be maintained until a sufficient turnover to permanent personnel can be achieved. All of these actions will be evaluated with the safety of the public and the plant in mind.

NJC/CODED/2686