

January 30, 2008

Mr. Barry S. Allen
Site Vice President
FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant
P. O. Box 97, 10 Center Road, A-PY-290
Perry, OH 44081-0097

SUBJECT: PERRY NUCLEAR POWER PLANT REQUEST FOR INFORMATION FOR AN
NRC TRIENNIAL BASELINE COMPONENT DESIGN BASES INSPECTION
(CDBI) 05000440/2008006(DRS)

Dear Mr. Allen:

On May 5, 2008, the NRC will begin a triennial baseline Component Design Bases Inspection (CDBI) at the Perry Nuclear Power Plant. A team of six inspectors will perform this 3-week inspection. This inspection will be performed in accordance with NRC Baseline Inspection Procedure (IP) 71111.21.

The CDBI inspection focuses on components that have high risk and low design margins. The components to be reviewed during this baseline inspection will be identified during an in-office preparation week prior to the first week of the on-site inspection. In addition, a number of risk significant operator actions and operating experience issues, associated with the component samples, will also be selected for review.

The inspection will include three weeks on-site, including the information gathering during the first on-site week. The inspection team will consist of six NRC inspectors, of which five will focus on engineering and one on operations. The current inspection schedule is as follows:

- On-site weeks: May 5, 2008, through May 9, 2008;
May 19, 2008, through May 23, 2008; and
June 2, 2008, through June 6, 2008.

The team will be preparing for the inspection, mainly during the week of April 28, 2008, as discussed in the attached enclosure. A Region III Senior Reactor Analyst may accompany the inspection team during the week of May 5, 2008, to review probabilistic risk assessment data, and assist in identifying risk significant components, which will be reviewed during the inspection.

Experience with previous baseline design inspections of similar depth and length has shown that these type of inspections are extremely resource intensive, both for the NRC inspectors and the licensee staff. In order to minimize the inspection impact on the site and to ensure a productive inspection for both parties, we have enclosed a request for information needed for the inspection.

It is important that all of these documents are up to date and complete in order to minimize the number of additional documents requested during the preparation and/or the on-site portions of the inspection. Insofar as possible, this information should be provided electronically to the lead inspector. The information request has been divided into three groups:

- The first group lists information necessary for our initial inspection scoping activities. This information should be provided to the lead inspector no later than March 24, 2008. By April 11, 2008, the lead inspector will communicate the initial selected set of approximately 30 high risk components.
- The second group of documents requested are those items needed to support our in-office preparation activities. This set of documents, including the calculations associated with the initial selected components, should be provided to the lead inspector at the Regional Office no later than April 23, 2008. During the in-office preparation activities, the team may identify additional information needed to support the inspection.
- The last group includes the additional information above as well as plant specific reference material. This information should be available to the team at Perry on May 5, 2008. It is also requested that corrective action documents and/or questions developed during the inspection be provided to the lead inspector as the documents are generated.

The lead inspector for this inspection is Dr. Stuart Sheldon. We understand that our licensing contact for this inspection is Mr. Kenneth Russell of your organization. If there are any questions about the inspection or the material requested in the enclosure, please contact the lead inspector at (630) 829-9727 or via e-mail at sns2@nrc.gov.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Ann Marie Stone, Chief
Engineering Branch 2
Division of Reactor Safety

Docket No. 50-440
License No. NPF-58

Enclosure: Component Design Bases Inspection (CDBI) Document Request

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OFFICE:	RIII		RIII		RIII		RIII	
NAME:	SSheldon: Is		AMStone					
DATE:	01/28/08		01/30/08					

OFFICIAL RECORD COPY

Letter to Mr. Barry S. Allen from Ms. A M. Stone dated January , 2008.

SUBJECT: PERRY NUCLEAR POWER PLANT REQUEST FOR INFORMATION FOR AN
NRC TRIENNIAL BASELINE COMPONENT DESIGN BASES INSPECTION
(CDBI) 05000440/2008006(DRS)

cc w/encl: J. Hagan, President and Chief Nuclear Officer - FENOC
J. Lash, Senior Vice President of Operations and
Chief Operating Officer - FENOC
D. Pace, Senior Vice President, Fleet Engineering - FENOC
J. Rinckel, Vice President, Fleet Oversight - FENOC
Director, Fleet Regulatory Affairs - FENOC
Manager, Fleet Licensing - FENOC
Manager, Site Regulatory Compliance - FENOC
D. Jenkins, Attorney, FirstEnergy Corp.
Public Utilities Commission of Ohio
Ohio State Liaison Officer
R. Owen, Ohio Department of Health

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INFORMATION REQUEST FOR PERRY NUCLEAR POWER PLANT
COMPONENT DESIGN BASES INSPECTION (CDBI)

Inspection Report: 05000440/2008006(DRS)

Inspection Dates: May 5, 2008, through May 9, 2008;
May 19, 2008, through May 23, 2008; and
June 2, 2008, through June 6, 2008.

Inspection Procedure: IP 71111.21 "Component Design Bases Inspection"

Lead Inspector: Stuart Sheldon, Lead Inspector
(630) 829-9727
sns2@nrc.gov

I. Information Requested Prior to the On-site Information Gathering/Inspection Week

The following information is requested by March 24, 2008, or sooner, to facilitate inspection preparation. If you have any questions regarding this information, please call the team leader as soon as possible. (Please provide the information electronically in "pdf" files, Excel, or other searchable formats, preferably on CDROM. The CDROM should contain descriptive names, and be indexed and hyperlinked to facilitate ease of use. Information in "lists" should contain enough information to be easily understood by someone who has knowledge of boiling water reactor technology).

1. Risk ranking of top 150 components from your site specific probabilistic safety analysis (PSA) sorted by Risk Achievement Worth (RAW). Include values for Birnbaum Importance, Risk Reduction Worth (RRW), and Fussell-Veseley (FV) (as applicable).
2. Provide a list of the top 200 cut-sets from your PSA.
3. Risk ranking of operator actions from your site specific PSA sorted by RAW. Provide copies of your human reliability worksheets for these items.
4. If you have an External Events or Fire PSA Model, provide the information requested in Items 1 and 2 for external events and fire. Provide narrative description of each coded event (including fire, flood zone description).
5. Any pre-existing evaluation or list of components and associated calculations with low design margins, (i.e., pumps closest to the design limit for flow or pressure, diesel generator close to design required output, heat exchangers close to rated design heat removal etc.).

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COMPONENT DESIGN BASES INSPECTION (CDBI)

6. List of available design (setup) margins for valves in the motor-operated valve (MOV) and air-operated valve (AOV) programs.
7. List of high risk Maintenance Rule systems/components based on engineering or expert panel judgment.
8. Structures, systems, and components (SSCs) in the Maintenance Rule (a)(1) category.
9. Site top ten issues list (if applicable).
10. A list of operating experience evaluations for the last 3 years.
11. Information of any common cause failure of components experienced in the last 5 years at your facility.
12. List of Root Cause Evaluations associated with component failures or design issues initiated/completed in the last 5 years.
13. Current management and engineering organizational chart.
14. Electronic copies of Updated Final Safety Analysis Report, Technical Specifications, Technical Specifications Bases, and Technical Requirements Manual.

II. Information requested (for the approx. 30 selected components) to be available by April 23, 2008, (will be reviewed by the team in the Regional office during the week of April 28, 2008). This information should be separated for each selected component, especially if provided electronically (e.g., folder with component name that includes calculations, condition reports, maintenance history, etc).

1. List of condition reports (corrective action documents) associated with each of the selected components for the last 4 years.
2. The corrective maintenance history associated with each of the selected components for the last 4 years.
3. Copies of calculations associated with each of the selected components (if not previously provided), excluding data files. Please review the calculations and also provide copies of referenced material (such as drawings, engineering requests, and vendor letters).
4. System Health Reports, System Descriptions, and/or Design Basis Documents that are associated with each of the selected components.

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COMPONENT DESIGN BASES INSPECTION (CDBI)

5. A list of modifications associated with each of the selected components.
6. Copies of operability evaluations associated with each of the selected components and plans for restoring operability, if applicable.
7. Copies of selected operator work-around evaluations associated with each of the selected components and plans for resolution, if applicable.
8. Copies of any open temporary modifications associated with each of the selected components, if applicable.
9. Trend data on the selected electrical/mechanical components' performance for last 3 years (For example, pumps' performance including in-service testing, other vibration monitoring, oil sample results, etc., as applicable).
10. A copy of any internal/external self-assessments and associated corrective action documents generated in preparation for the inspection.
11. A copy of engineering/operations related audits completed in the last 2 years.
12. Provide list of PRA assumptions regarding operator actions and the associated procedures.

III. Additional Information to be provided on May 5, 2008 on-site (for final 15 - 20 selected components)

During the in-office preparation activities, the team will be making final selections and may identify additional information needed to support the inspection. The lead inspector will provide a list of the additional information needed during the week of April 28, 2008.

IV. Information Requested to be provided throughout the inspection

1. Copies of any corrective action documents generated as a result of the team's questions or queries during this inspection.
2. Copies of the list of questions submitted by the team members and the status/resolution of the information requested (provide daily during the inspection to each team member).
3. One complete set of P&IDs and one line electrical drawings (paper copies).
4. Reference materials. (make available if needed during all on-site weeks):

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COMPONENT DESIGN BASES INSPECTION (CDBI)

- IPE/PRA report;
- Procurement documents for components selected (verify retrievable);
- Plant procedures (normal, abnormal, emergency, surveillance, etc.); and
- Vendor manuals.

If you have questions regarding the information requested, please contact the lead inspector.