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 AUTH.NAME AUTHOR AFFILIATION
 KAPLAN,A. Cleveland Electric Illuminating Co.
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SUBJECT: Provides response to SALP Board rept for May 1987 - Apr 1988. Response suppl comments on SALP 8 rept.

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August 30, 1988
PY-CEI/NRR-0903 L

U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Perry Nuclear Power Plant
Docket No. 50-440
Perry Plant SALP 8 Response

Gentlemen:

This letter provides the Cleveland Electric Illuminating Company's response to the Systematic Assessment of Licensee Performance (SALP) Board's report for the Perry Nuclear Power Plant, Unit 1 covering the period May 1, 1987 through April 30, 1988. This response supplements our comments on the SALP 8 Report expressed during a meeting with the NRC on August 2, 1988.

CEI appreciated the opportunity to discuss the Perry Plant SALP 8 report with you on August 2, 1988. We recognize the NRC staff's efforts in performing a thorough and objective analysis of Perry's startup and first months of commercial operation. We were encouraged to have received the highest rating in three of the functional areas. Our goal this year is to continue improvements in several other areas so as to achieve even more Category 1 ratings on the next SALP report.

CEI continuously attempts to evaluate and improve our existing programs. Numerous changes have been implemented in such areas as maintenance and operations to deal with internally perceived shortcomings. When CEI detected an apparent increase in the number of personnel errors, and procedural noncompliance, steps were taken to increase the sensitivity to these areas. The specific steps taken in these areas have been discussed with the NRC Region III staff. Another example is the current work underway to eliminate unnecessary control room alarms. To increase management attention to this area, we have begun scheduling these items on the Quarterly Schedule. CEI feels most of the work effort can be completed by the end of the first refueling outage.

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A third example of CEI trying to improve our existing programs is the effort done to date concerning root cause analysis and work history documentation. We are implementing program improvements in both areas, and feel confident that the improvements will greatly aid our ability to trend potential problems, and better prevent problems from recurring. Along with these program improvements, recent organization changes removed support functions from the Engineering Departments, permitting more concise direction for these departments. These organizational changes should also aid in improving engineering involvement in root cause analysis.

It is this same type of philosophy that has led us to performing self-critiques of our maintenance outages to date. These critiques have provided invaluable insight into improvements and scheduling of work for future outages. Our first refueling outage will be a test of how well we have learned these lessons.

CEI welcomes your comments on our training program. This is one of the areas we feel can achieve a Category 1 rating during this next SALP period. It has always been CEI's philosophy that all project personnel must be involved in order for a training program to be successful. We have stressed that our line management be involved in the development and implementation of the training program. We feel we are reaping the benefits from this involvement.

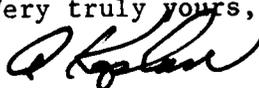
There are two other areas in the SALP 8 Report which should be touched on. The first deals with manning in the Health Physics area. As stated in the August 2 meeting, CEI is now fully manned in this area. Although some of these people are recently hired and still in our initial training program, it is fully expected that all will be qualified by the beginning of our first refueling outage. This will allow us to maintain thorough coverage of work activities during this period.

The second area deals with adequacy of communications with the NRC. CEI understands the importance of timely and thorough communications with the NRC staff as they relate to licensing activities. We will continue to improve in our efforts at providing the sufficient level of detail necessary in licensing submittals to allow NRC the opportunity to perform independent review of the acceptability of changes being requested.

In closing, CEI again appreciates the difficulty of the NRC's task in evaluating a Licensee. It is our intent to become a top performer in the nuclear industry, and we welcome your constructive comments toward that goal.

If you have any questions feel free to call.

Very truly yours,



Al Kaplan
Vice President
Nuclear Group

AK:njc

cc: T. Colburn
K. Connaughton
Region III