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SUBJECT: Provides response to SALP Rept 9 for May 1988 - May 1989.

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Al Kaplan

VICE PRESIDENT
NUCLEAR GROUP

September 29, 1989

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Washington, D. C. 20555

Perry Nuclear Power Plant
Docket No. 50-440
Perry Plant SALP 9 Response

Gentlemen:

This letter provides the Cleveland Electric Illuminating Company's response to the Systematic Assessment of Licensee Performance (SALP) report for the Perry Nuclear Power Plant, Unit 1, covering the period of May 1, 1988 through May 30, 1989. This response supplements our comments on the SALP 9 report expressed during a meeting with the NRC on August 29, 1989 and is concentrated on the issues identified in your letter dated August 3, 1989.

CEI appreciates the opportunity to discuss the Perry Plant SALP 9 report with your staff during the August 29 meeting. We recognize the NRC Staff's efforts in performing a thorough and objective evaluation of Perry's operation during the first cycle and the first few months of the initial refueling outage. We are encouraged to again receive the highest rating in the functional areas of Security and Emergency Planning, as we had for the previous three reporting periods. Our current goal is to continue improvements in several other areas in order to achieve Category 1 performance during the next SALP period.

We at Perry understand the importance of open communications with the NRC, both Region III management and NRR. This is especially important for significant issues, even when they may not meet the notification requirements of 10CFR50.72. In communication of this nature, judgement is made on a case-by-case basis when deciding what information is of interest to the NRC and what mechanism should be used for communication. Many of these decisions are based in part on past experience in dealing with NRC staff. During this SALP period, a reassignment of key Region III personnel occurred, and for a significant time, no permanent Senior Resident Inspector was assigned. As a result, a period of adjustment in our communication policies is being encountered. Accordingly, a permanent informal policy has been established at Perry to enhance future communications. This policy should ensure direct communication with the Senior Resident Inspector, Region III offices, and NRR concerning events of potential significance.

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CEI also understands the importance of timely and thorough communications with the NRC staff as they relate to licensing submittals. In general, we feel that there has been improvement in this area and we will continue to emphasize communication with the staff regarding submittals.

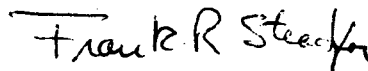
The Perry staff recognizes the importance of management involvement over licensed activities. During the first operating cycle and initial refueling outage, an enormous effort was expended by both plant management and the plant's workforce to correct plant equipment problems. As a result, improved maintenance scheduling and design change implementation programs have been developed. We are utilizing these programs to minimize the backlog of corrective maintenance items. The plant management staff and the Company remains strongly committed to the improvement of plant and system performance.

One of our primary objectives for the first refueling outage was the elimination of plant steam leaks. An additional reactor shutdown during the post-outage power ascension was utilized to accomplish this effort. All steam leaks both in the drywell and the steam tunnel area were repaired. As a result, overall leakage in the drywell is now the lowest it has ever been. Now, when steam leaks are discovered, a newly developed steam leak check list is utilized to evaluate action needed to minimize the impact on plant operations. These efforts are clear examples of our management commitment minimize the impact of steam leaks on plant performance.

In closing, we express our appreciation of the difficulty of the NRC's task in evaluating a licensee's performance. It is our intent to become a top performer in the nuclear industry, and we welcome your constructive comments toward the achievement of that goal.

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

Very truly yours,



Al Kaplan
Vice President
Nuclear Group

AK:njc

cc: T. Colburn
P. Hiland