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SUBJECT: Responds to SALP 10 rept covering June 1989 to Jul 1990.

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Vice President - Nuclear

November 19, 1990
PY-CEI/NRR-1259 L

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

Perry Nuclear Power Plant
Docket No. 50-440
Perry Plant SALP 10 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 June 1, 1989 through July 31, 1990. This response supplements our comments on the SALP 10 report expressed during a meeting with the NRC on October 30, 1990 and is concentrated on the issues identified in your letter dated October 3, 1990.

CEI appreciated the opportunity to discuss the Perry Plant SALP 10 report with your staff during the October 30 meeting and we recognize the NRC Staff's efforts in performing a thorough and objective evaluation of Perry's operation during the second cycle. We are encouraged to again receive the highest rating in the functional areas of Security and Emergency Preparedness, as we had for the previous four reporting periods. On the other hand, we were disappointed that we were unable to show sufficient improvement to achieve a Category 1 performance rating in any other areas. A review of the initial SALP 10 report and your comments at the SALP meeting indicates that the NRC has observed improvements in some areas, particularly those of Plant Operations and Radiological Control. We will strive to continue improvement in these areas and others until excellence is achieved and recognized.

The importance of a well developed and professionally implemented surveillance program is fully understood by the Perry organization. Additionally, we recognize the events and influences which resulted in a declining trend in the Maintenance/Surveillance area. We intend to pursue improvement in the area of test results review and initiation of corrective actions with the same commitment that we developed to improve the Operations performance in the second fuel cycle. Some of the actions will include a strong management commitment to procedural compliance, attention to detail, effective communications, and thorough and effective problem solving.

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Operating Units:
Cleveland Electric Illuminating
Toledo Edison

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The report referred to deterioration in Plant Housekeeping during the latter part of the assessment period. Credit was given for implementation of the Plant Housekeeping Inspection program in November, 1989. Perry personnel are striving to develop an attitude that the practice of good housekeeping is a crucial factor in maintaining a safe and efficient operating plant. Plant management will continue to foster that attitude, to make good housekeeping an integral part of the work routine. Specific problem areas will be addressed through appropriate management attention.

Finally, we would like to express our recognition of improvements in the NRC assessment and evaluation efforts. It is also apparent that industry standards continue to demand a higher level of performance as the industry matures. It has always been 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.

Sincerely,



Michael D. Lyster

MDL:HLH:njc

cc: USNRC Project Manager
USNRC Sr. Resident Inspector
USNRC Region III