



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

May 13, 2011

Mr. Mark Bezilla
Site Vice President
FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant
P. O. Box 97, 10 Center Road, A-PY-A290
Perry, OH 44081-0097

**SUBJECT: PERRY NUCLEAR POWER PLANT – NRC TEMPORARY
INSTRUCTION 2515/183 INSPECTION REPORT 050000440/2011011**

Dear Mr. Bezilla:

On April 29, 2011, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Perry Nuclear Power Plant, using Temporary Instruction 2515/183, "Followup to the Fukushima Daiichi Nuclear Station Fuel Damage Event." The enclosed inspection report documents the inspection results which were discussed on May 6, 2011, with you and other members of your staff.

The objective of this inspection was to promptly assess the capabilities of Perry Nuclear Power Plant to respond to extraordinary consequences similar to those that have recently occurred at the Japanese Fukushima Daiichi Nuclear Station. The results from this inspection, along with the results from this inspection performed at other operating commercial nuclear plants in the United States, will be used to evaluate the U.S. nuclear industry's readiness to safely respond to similar events. These results will also help the NRC to determine if additional regulatory actions are warranted.

All of the potential issues and observations identified by this inspection are contained in this report. The NRC's Reactor Oversight Process will further evaluate any issues to determine if they are regulatory findings or violations. Any resulting findings or violations will be documented by the NRC in a separate report. You are not required to respond to this letter.

M. Bezilla

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made 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/

Jamnes L. Cameron, Chief
Branch 6
Division of Reactor Projects

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

Enclosure: Inspection Report 050000440/2011011
w/Attachment: Supplemental Information

cc w/encl: Distribution via ListServ

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-440

License No: NPF-58

Report No: 050000440/2011011

Licensee: FirstEnergy Nuclear Operating Company (FENOC)

Facility: Perry Nuclear Power Plant, Unit 1

Location: Perry, Ohio

Dates: March 23, 2011, through April 29, 2011

Inspectors: M. Marshfield, Senior Resident Inspector
T. Hartman, Resident Inspector

Approved by: Jamnes L. Cameron, Chief
Branch 6
Division of Reactor Projects

Enclosure

SUMMARY OF FINDINGS

IR 05000440/2011011, 03/23/2011 – 04/29/2011; Perry Nuclear Power Plant; Temporary Instruction 2515/183 - Followup to the Fukushima Daiichi Nuclear Station Fuel Damage Event

This report covers an announced Temporary Instruction inspection. The inspection was conducted by resident inspectors. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

INSPECTION SCOPE

The intent of the TI is to provide a broad overview of the industry's preparedness for events that may exceed the current design basis for a plant. The focus of the TI was on (1) assessing the licensee's capability to mitigate consequences from large fires or explosions on site, (2) assessing the licensee's capability to mitigate station blackout (SBO) conditions, (3) assessing the licensee's capability to mitigate internal and external flooding events accounted for by the station's design, and (4) assessing the thoroughness of the licensee's walk downs and inspections of important equipment needed to mitigate fire and flood events to identify the potential that the equipment's function could be lost during seismic events possible for the site. If necessary, a more specific follow-up inspection will be performed at a later date.

INSPECTION RESULTS

All of the potential issues and observations identified by this inspection are contained in this report. The NRC's Reactor Oversight Process will further evaluate any issues to determine if they are regulatory findings or violations. Any resulting findings or violations will be documented by the NRC in a separate report.

03.01 Assess the licensee's capability to mitigate conditions that result from beyond design basis events, typically bounded by security threats, committed to as part of NRC Security Order Section B.5.b issued February 25, 2002, and severe accident management guidelines and as required by Title 10 of the Code of Federal Regulations (10 CFR) 50.54(hh). Use Inspection Procedure (IP) 71111.05T, "Fire Protection (Triennial)," Section 02.03 and 03.03 as a guideline. If IP 71111.05T was recently performed at the facility the inspector should review the inspection results and findings to identify any other potential areas of inspection. Particular emphasis should be placed on strategies related to the spent fuel pool. The inspection should include, but not be limited to, an assessment of any licensee actions to:

Licensee Action	Describe what the licensee did to test or inspect equipment.
<p>a. Verify through test or inspection that equipment is available and functional. Active equipment shall be tested and passive equipment shall be walked down and inspected. It is not expected that permanently installed equipment that is tested under an existing regulatory testing program be retested.</p> <p>This review should be done for a reasonable sample of mitigating strategies/equipment.</p>	<p>Licensee actions included the identification of equipment (active and passive) utilized for implementation of B.5.b actions and any additional equipment used in Severe Accident Guidelines (SAGs). The scope of the equipment was defined as that equipment specifically designated for B.5.b or SAG mitigation (i.e., special hoses, fittings, diesel battery charger, etc.). All active equipment was functionally tested. Fire pumps in place for B.5.b response were tested with a functional water flow test. Permanent plant equipment (i.e., in situ equipment) was not considered in the scope, since it is normally in service, subjected to planned maintenance, and/or checked on operator rounds. The licensee identified surveillances/tests and performance frequencies for the in situ equipment determined under this item, and reviewed the results of recent tests. Passive equipment within the scope was walked down and inspected.</p>
	<p>Describe inspector actions taken to confirm equipment readiness (e.g., observed a test, reviewed test results, discussed actions, reviewed records, etc.).</p>
	<p>The licensee's actions as discussed above were completed prior to the issuance of NRC TI 2515/183. The inspectors assessed the licensee's capabilities by conducting a review of the licensee's walkdown activities. In addition, the inspectors independently walked down and inspected all major B.5.b contingency response equipment staged throughout the site. The results of the inspectors' independent walkdowns agreed with the results obtained by the licensee.</p>
	<p>Discuss general results including corrective actions by licensee.</p> <p>All equipment (active and passive) designated to support B.5.b procedure requirements was verified by the licensee to be available and properly located. All passive equipment was walked down and verified to be in place and ready for use. Passive equipment which had surveillance and/or preventative maintenance tasks had those activities performed to verify readiness for use.</p>

	<p>All active equipment located at the site was verified in place by the licensee. The licensee retested all active equipment; flow testing was performed on designated B.5.b transportable fire pumps.</p>
<p>Licensee Action</p>	<p>Describe the licensee’s actions to verify that procedures are in place and can be executed (e.g. walkdowns, demonstrations, tests, etc.)</p>
<p>b. Verify through walkdowns or demonstration that procedures to implement the strategies associated with B.5.b and 10 CFR 50.54(hh) are in place and are executable. Licensees may choose not to connect or operate permanently installed equipment during this verification.</p> <p>This review should be done for a reasonable sample of mitigating strategies/equipment.</p>	<p>Licensee actions included the identification of those procedures utilized to mitigate the consequences of a B.5.b-related event and severe accidents. The licensee then compiled verification documentation for procedure validations and identified any procedures not issued or validated and any with open change requests. Open change requests were reviewed for potential impacts on procedure functionality. Walkdowns were performed on all identified procedures that utilize non-plant equipment or that specify lifted leads or jumpers for permanent plant equipment.</p> <p>Describe inspector actions and the sample strategies reviewed. Assess whether procedures were in place and could be used as intended.</p> <p>The licensee’s actions as discussed above were completed prior to the issuance of NRC TI 2515/183. The inspectors assessed the licensee’s capabilities by conducting a review of the licensee’s walkdown activities. In addition, the inspectors selected a sample of the procedures walked down by the licensee and walked those down independently to verify the licensee’s conclusions. The procedures walked down by the inspectors showed no discrepancies which had not been previously identified by the licensee and entered into the corrective action program (CAP).</p> <p>Discuss general results including corrective actions by licensee.</p> <p>The licensee reviewed the site SAG strategies and did not identify any issues. Procedures used for B.5.b were reviewed by the licensee and walkdowns were performed by operators to ensure actions taken in the field in response to a B.5.b event could be performed. Open procedure change requests were reviewed by the licensee to verify that there were no immediate procedure changes required. Two changes were identified by the licensee as having potential impact on operator response to a situation because the changes correct erroneous equipment locations identified in the procedures. The licensee upgraded the priority of these two change requests. Some minor enhancements were identified by the licensee and entered into the CAP. Specific condition reports (CRs) are listed in section 03.01(e) below.</p>

Licensee Action	Describe the licensee's actions and conclusions regarding training and qualifications of operators and support staff.
<p>c. Verify the training and qualifications of operators and the support staff needed to implement the procedures and work instructions are current for activities related to Security Order Section B.5.b and severe accident management guidelines as required by 10 CFR 50.54 (hh).</p>	<p>Licensee actions included the identification of training/qualification requirements for operators for the implementation of actions needed to mitigate a B.5.b-related event, and for the implementation of actions needed for SAG processes. The licensee documented that operator training requirements were current.</p>
	<p>In addition, the licensee identified the training/qualification requirements for applicable emergency response organization (ERO) command and support staff, including security personnel, for the implementation of actions needed to mitigate a B.5.b-related event and SAG processes. The licensee also verified that ERO command and support staff training requirements were current.</p>
	<p>Describe inspector actions and the sample strategies reviewed to assess training and qualifications of operators and support staff</p>
	<p>The licensee's actions as discussed above were completed prior to the issuance of NRC TI 2515/183. The inspectors assessed the licensee's training and qualification activities by conducting a review of training and qualification materials and records related to B.5.b and SAG event response.</p>
	<p>Discuss general results including corrective actions by licensee.</p>
<p>The training requirements, qualifications, and associated records needed for operators for the implementation of SAGs and B.5.b event response were reviewed by the licensee. Training was identified for shift managers, shift engineers, unit supervisors, reactor operators and non-licensed operators. The licensee verified that training requirements were embedded within the position qualifications for operators. The licensee confirmed that all shift operators verify their qualifications prior to assuming a shift position. The training requirements, qualifications, and associated records needed for ERO command and support staff for the implementation of actions needed to mitigate a B.5.b event or implement the SAGs were also reviewed. All ERO command and support staff training requirements were verified as current by the licensee.</p>	

Licensee Action	Describe the licensee's actions and conclusions regarding applicable agreements and contracts are in place.
<p>d. Verify that any applicable agreements and contracts are in place and are capable of meeting the conditions needed to mitigate the consequences of these events.</p> <p>This review should be done for a reasonable sample of mitigating strategies/equipment.</p>	<p>Licensee actions included the identification of all applicable contracts and agreements committed to be in place for the mitigation of a B.5.b-related event. The licensee verified that the contracts and agreements were current and documented whether or not the contracts/agreements were capable of meeting the mitigation strategy.</p>
	<p>For a sample of mitigating strategies involving contracts or agreements with offsite entities, describe inspector actions to confirm agreements and contracts are in place and current (e.g., confirm that offsite fire assistance agreement is in place and current).</p>
	<p>The licensee's actions as discussed above were completed prior to the issuance of NRC TI 2515/183. The inspectors assessed the licensee's capabilities by conducting an independent review of the licensee's emergency response agreement with local counties and the standing mutual aid scheme in Ohio, Mutual Aid Box Alarm System, and the State of Ohio Emergency Response Plan. The licensee also maintains several emergency response agreements including with surrounding counties and fire agencies which support mitigation of events at the site. These agreements were verified to be current.</p>
	<p>Discuss general results including corrective actions by licensee.</p> <p>Licensee review of Letters of Agreement and Grant Agreements were found to be current and in place to support mitigation of security threats and mitigation strategies for other on-site events.</p>

<p style="text-align: center;">Licensee Action</p>	<p>Document the corrective action report number and briefly summarize problems noted by the licensee that have significant potential to prevent the success of any existing mitigating strategy.</p>
<p>e. Review any open corrective action documents to assess problems with mitigating strategy implementation identified by the licensee. Assess the impact of the problem on the mitigating capability and the remaining capability that is not impacted.</p>	<p>The following entries into the licensee’s CAP were made in response to issues identified in Section 03.01:</p> <p>CR 11-91320 ONI-ZZZ-7 Spare vs. Future Breaker CR 11-91328 EOP-SPI-1.8 ABI Hose Casing Damaged CR 11-91401 B5b Air Compressor Start Procedure CR 11-91481 ONI-SPI-D10 Equipment Lists Wrong Size Socket CR 11-91482 FPI-A-T03 Champion Fire Pump Procedure Enhancements CR 11-91492 ONI-SPI-D10 Items Not Inventoried by a PM CR 11-91495 ONI-ZZZ-7 Procedure Enhancements; Jumper Cable Staging CR 11-91583 ONI-SPI-A7 Enhancement for Locations at Remote S/D Panel CR 11-91638 Foam Trailers Not on a PM CR 11-91714 MARCS Radio Not Answered During Test w/ Dispatch</p> <p>The inspectors reviewed each CR for potential impact to the licensee’s mitigation strategies. No significant impacts were identified.</p>
<p>03.02 Assess the licensee’s capability to mitigate station blackout (SBO) conditions, as required by 10 CFR 50.63, “Loss of All Alternating Current Power,” and station design, is functional and valid. Refer to TI 2515/120, “Inspection of Implementation of Station Blackout Rule Multi-Plant Action Item A-22” as a guideline. It is not intended that TI 2515/120 be completely reinspected. The inspection should include, but not be limited to, an assessment of any licensee actions to:</p>	
<p style="text-align: center;">Licensee Action</p>	<p>Describe the licensee’s actions to verify the adequacy of equipment needed to mitigate an SBO event.</p>
<p>a. Verify through walkdowns and inspection that all required materials are adequate and properly staged, tested, and maintained.</p>	<p>Licensee actions included the identification of equipment utilized/required for mitigation of an SBO. The licensee then conducted walkdowns of this equipment to ensure they were adequate and properly staged. Additionally, the licensee also conducted a review of open CAP items for potential SBO equipment impact.</p>

	<p>Describe inspector actions to verify equipment is available and useable.</p> <p>The inspectors assessed the licensee’s capability to mitigate SBO conditions by conducting a review of the licensee’s walkdown activities. In addition, the inspectors selected a sample of equipment utilized/required for mitigation of an SBO and conducted independent walkdowns of that equipment to verify that the equipment was properly aligned and staged. The sample of equipment selected by the inspectors included those necessary to complete actions required by the following procedures: Off- Normal Instruction (ONI) R-10 “Loss of AC Power;” ONI-Special Plant Instruction (SPI) A-7, “RCIC Emergency Operation;” and ONI-SPI D-10, “Hydrogen Igniter Emergency Operation.”</p> <p>Discuss general results including corrective actions by licensee.</p> <p>The licensee determined that procedures for response to an SBO which are implemented through ONI R-10, “Loss of AC Power,” were adequate and materials were properly staged to support actions required by procedures. Minor discrepancies with required tools lists (all tools required were present but lists were deficient) and enhancements to procedures were identified and documented in the CAP for the licensee as follows:</p> <p>CR 11-92018 ONI-SPI-A6, B6 Needs an Additional Tool – Adjustable Wrench CR 11-92207 Not All Items Used in ONI-SPI-A6, B6 on PM Inventory CR 11-91755 Div 3 DG Overspeed Reset Posted Aid Not as Detailed as Attachment CR 11-91756 Labels on ED1C Degraded CR 11-91964 LPCS Flush Connection Not Labeled</p>
Licensee Action	<p>Describe the licensee’s actions to verify the capability to mitigate an SBO event.</p>
<p>b. Demonstrate through walkdowns that procedures for response to an SBO are executable.</p>	<p>Licensee actions included the identification of procedures required for response to an SBO, along with verification that the identified procedures were current and that no critical revision requests were in place. The licensee then verified that the mitigating procedures had been properly validated. Additionally, the licensee also conducted a review of open CAP items for potential impact to SBO procedures.</p> <p>Describe inspector actions to assess whether procedures were in place and could be used as intended.</p> <p>The inspectors assessed the licensee’s capabilities by conducting a review of the licensee’s walkdown activities. In addition, the inspectors selected a sample of the procedures walked down by the licensee and walked those down to independently verify the licensee’s conclusions. The procedures reviewed by the inspectors included: ONI R-10 “Loss of AC Power;” ONI- SPI A-7, “RCIC Emergency Operation;” and ONI-SPI D-10, “Hydrogen Igniter Emergency Operation.”</p>

	<p>Discuss general results including corrective actions by licensee.</p> <p>The licensee procedure utilized to respond to an SBO is ONI R-10, "Loss of AC Power." Additionally a combination of ONIs and Emergency Operating Procedures, were identified for walkdowns. All procedures were found to be executable as written. Several enhancements were identified and captured in the CAP as follows:</p> <p>CR 11-92499 Procedure Enhancements Identified for Increased Priority CR 11-91740 ONI-SPI-B4 Component Location Not Correct CR 11-91741 ONI-SPI-F5 Component Location Not Correct CR 11-91844 ONI-SPI-H1, H2 Enhancements CR 11-91856 ONI-SPI-C3 Human Performance Improvements</p>
<p>03.03 Assess the licensee's capability to mitigate internal and external flooding events required by station design. Refer to IP 71111.01, "Adverse Weather Protection," Section 02.04, "Evaluate Readiness to Cope with External Flooding" as a guideline. The inspection should include, but not be limited to, an assessment of any licensee actions to verify through walkdowns and inspections that all required materials and equipment are adequate and properly staged. These walkdowns and inspections shall include verification that accessible doors, barriers, and penetration seals are functional.</p>	
<p>Licensee Action</p>	<p>Describe the licensee's actions to verify the capability to mitigate existing design basis flooding events.</p>
<p>a. Verify through walkdowns and inspection that all required materials are adequate and properly staged, tested, and maintained.</p>	<p>Licensee actions included the identification of equipment and penetration seals utilized/required for mitigation of internal and external flooding. The licensee then conducted walkdowns of this equipment to ensure it was adequate and properly staged. The primary equipment credited for flood mitigation in Perry design analyses are room and sump level detectors and sump pump running alarms (level switches or transmitters that actuate control room annunciation windows to alert the operators). Credited equipment drains were walked down and determined to be functional. Doors, barriers, and penetration seals that are utilized for mitigation of flooding were identified and checked to see if they were routinely inspected to ensure functionality. Where routine inspections were not performed or could not be relied upon to ensure functionality, the licensee performed walkdowns and inspections to ensure that the components were functional.</p>

	<p>Describe inspector actions to verify equipment is available and useable. Assess whether procedures were in place and could be used as intended.</p> <p>The inspectors assessed the licensee’s capabilities to mitigate flooding by conducting a review of the licensee’s walkdown activities. In addition, the inspectors conducted independent walkdowns of selected flood mitigation equipment to review the overall assessment of the licensee’s flood mitigating capabilities. Licensee flood mitigation procedures were reviewed to verify usability. An external plant walkdown was conducted to review site external flood potential and licensee mitigation strategies. The inspectors' reviews were consistent with the licensee conclusions of functionality.</p> <p>Discuss general results including corrective actions by licensee.</p> <p>The licensee determined that, with a couple of minor deficiencies, all doors barriers and penetration seals relied on for internal flooding control and mitigation of external flooding events are tested on a periodic basis which supports the functionality of the equipment. Deficiencies noted were captured in the CAP as follows:</p> <ul style="list-style-type: none"> CR 11-92019 Turbine Building to Heater Bay Wall Penetration Blocked CR 11-92037 Potential Flooding Concern HB 620' CR 11-92215 Degraded Intermediate Building Floor Penetrations CR 11-92301 Flooding Vulnerability for Items Stored At and Near the Swale CR 11-92425 Vulnerability for Flood Barriers at Safety Electrical Manholes CR 11-92555 Penetration Seals Not Inspected Due to Location or Rad Levels
<p>03.04 Assess the thoroughness of the licensee’s walkdowns and inspections of important equipment needed to mitigate fire and flood events to identify the potential that the equipment’s function could be lost during seismic events possible for the site. Assess the licensee’s development of any new mitigating strategies for identified vulnerabilities (e.g., entered it in to the CAP and any immediate actions taken). At a minimum, the licensee should have performed walkdowns and inspections of important equipment (permanent and temporary) such as storage tanks, plant water intake structures, and fire and flood response equipment; and developed mitigating strategies to cope with the loss of that important function. Use IP 71111.21, “Component Design Basis Inspection,” Appendix 3, “Component Walkdown Considerations,” as a guideline to assess the thoroughness of the licensee’s walkdowns and inspections.</p>	

Licensee Action	Describe the licensee’s actions to assess the potential impact of seismic events on the availability of equipment used in fire and flooding mitigation strategies.
<p>a. Verify through walkdowns that all required materials are adequate and properly staged, tested, and maintained.</p>	<p>Licensee actions included the identification of equipment utilized/required for mitigation of fire and flood events. Seismic vulnerabilities, including storage locations, were identified, along with mitigating strategies for equipment that was not seismically qualified. The licensee identified that portions of fire suppression system piping which provide fire protection to nuclear plant support systems is seismically qualified and can be supplied from the seismically qualified backup system, which is Emergency Service Water, through various points of interconnection.</p>
	<p>Describe inspector actions to verify equipment is available and useable. Assess whether procedures were in place and could be used as intended.</p>
	<p>The inspectors conducted independent walkdowns of important equipment needed to mitigate fire and flood events to identify the potential that the equipment’s function could be lost during a seismic event. This equipment included, but was not limited to: major B.5.b contingency response equipment staged throughout the site; installed fire protection and suppression equipment in the Intermediate Building and Control Complex; and installed diesel and electric fire pumps and their controls.</p>
	<p>Licensee flood and fire mitigation procedures were reviewed to verify usability. The results of the inspectors’ reviews were consistent with the licensee’s conclusions that there were a number of seismic vulnerabilities that potentially need to be addressed.</p>
	<p>Discuss general results including corrective actions by the licensee. Briefly summarize any new mitigating strategies identified by the licensee as a result of their reviews.</p>
<p>“Seismically qualified” is defined as the safety-related structure, system and component (SSCs) that have been formally qualified to function during and after a design basis earthquake, as applicable. The licensee’s reviews for this issue determined that non-safety related SSCs, in general, were not considered to be either seismically qualified or seismically rugged due to a wide variety of issues. The majority of room flood mitigation sump pumps and flooding detectors were not designed as seismically qualified and have not been evaluated as being seismically rugged. Similarly, the vast majority of the fire protection system, including both installed fire pumps, was not designed as seismically qualified and cannot be considered seismically rugged. Firefighting equipment staged to respond to B.5.b events was not stowed in seismically qualified buildings and locations, as a seismic event and B.5.b event have never been assumed to occur coincidentally.</p>	

	<p>The licensee's reviews identified instances where response capability could be enhanced. These included developing additional mitigation strategies, reviewing the locations of portable equipment, and reviewing the need for supplemental portable equipment to compensate for the possible loss of the fire water headers, the fire pumps, and much of the fire suppression system piping.</p> <p>Further, reviews by the licensee identified that, in the event of a postulated earthquake, equipment may not function properly due to loss of essential power or being subjected to physical displacement. An existing mitigation strategy of conducting station surveys per the emergency plan and manning the emergency response organization following a seismic event was considered presently sufficient by the licensee. Further mitigation strategies, the licensee determined, will entail following industry recommendations from other plants that have identified similar beyond-design-bases vulnerabilities. The licensee entered the following minor issues into their CAP:</p> <p>CR 11-92349 Scaffold Lay Down Area in IB Around Fire Protection Piping CR 11-92350 Three Scaffold Builds are Around Fire Piping CR 11-92352 Two Fire Protection Valves Noted to Have Packing Gland Leaks CR 11-92355 Fire Protection Piping Leaks Were Noted CR 11-92464 Some Equipment Racks in the SB-620' Brigade Station May Topple in Seismic Event. Should Be Fastened to Wall. CR 11-92349 Two Fire Protection Isolation Valves Were Noted to Have Packing Leaks. CR 11-92350 Three Scaffold Builds Were Noted to Be Built Around / Near Fire Protection Piping. CR 11-92410 Some Minor Deficiencies Noted on ESW Pump House Fire Piping. CR 11-92365 Scaffold Lay Down Area in CC in Close Proximity to Fire Protection Piping. CR 11-92366 Scaffold Storage Area on 574' Elevation of Control Complex in Close Proximity to Fire Protection Piping and Associated Hose Reel. CR 11-92557 Components Inaccessible for Walkdown.</p>
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Meetings

Exit Meeting

The inspectors presented the inspection results to Mr. Mark Bezilla and other members of licensee management on May 6, 2011. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

M. Bezilla, Site Vice President
K. Krueger, Plant General Manager
J. Grabnar, Site Engineering Director
H. Hanson, Performance Improvement Director
T. Jardine, Operations Manager
L. Lindros, Site Security Manager
M. Stevens, Maintenance Director

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety but rather that selected sections of portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

03.01 Assess the licensee's capability to mitigate conditions that result from beyond design basis events

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
PYBP-ERS-0003	Emergency Plan Facility/Equipment Inventory Checklists	Rev. 7
ONI-SPI D-10	Hydrogen Igniter Emergency Operation	Rev. 1
OAI-1901	Emergency Management Overview	Rev. 0
SAG-1	Primary Containment Flooding	Rev. 2
SAG-2	RPV, Containment, and Radioactivity Release Control	Rev. 2
IP 71111.05T	NRC Inspection Procedure: Fire Protection (Triennial)	Jan 1, 2011
CR 11-91320	ONI-ZZZ-7 Spare vs. Future Breaker	Mar 19, 2011
CR 11-91328	EOP-SPI-1.8 ABI Hose Casing Damaged	Mar 20, 2011
CR 11-91401	B5b Air Compressor Start Procedure	Mar 21, 2011
CR 11-91481	ONI-SPI-D10 Equipment Lists Wrong Size Socket	Mar 21, 2011
CR 11-91482	FPI-A-T03 Champion Fire Pump Procedure Enhancements	Mar 21, 2011
CR 11-91492	ONI-SPI-D10 Items not Inventoried by a PM	Mar 22, 2011
CR 11-91495	ONI-ZZZ-7 Procedure Enhancements; Jumper Cable Staging	Mar 22, 2011
CR 11-91583	ONI-SPI-A7 Enhancement for Locations at Remote S/D Panel	Mar 23, 2011
CR 11-91638	Foam Trailers not on a PM	Mar 24, 2011
CR 11-91714	MARCS Radio not Answered During Test w/ Dispatch	Mar 25, 2011

03.02 Assess the licensee's capability to mitigate station blackout (SBO) conditions

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
ONI-SPI A-7	RCIC Emergency Operation	Rev. 3
ONI-R10	Loss of AC Power	Rev. 9
CR 11-91740	ONI-SPI-B4 Component Location not Correct	Mar 25, 2011
CR 11-91741	ONI-SPI-F5 Component Location not Correct	Mar 25, 2011
CR 11-91755	Div 3 DG Overspeed Reset Posted Aid not as Detailed as Attachment	Mar 25, 2011
CR 11-91756	Labels on ED1C Degraded	Mar 25, 2011
CR 11-91844	ONI-SPI-H1, H2 Enhancements	Mar 28, 2011
CR 11-91856	ONI-SPI-C3 Human Performance Improvements	Mar 28, 2011
CR 11-91964	LPCS Flush Connection not Labeled	Mar 29, 2011
CR 11-92018	Add Adjustable Wrench to Tools for ONI-SPI A-6, B-6	Mar 30, 2011
CR 11-92207	Not all Items Used in ONI-SPI-A6, B6 on PM Inventory	Apr 1, 2011

CR 11-92499	Procedure Enhancements Identified for Increased Priority	Apr 7, 2011
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03.03 Assess the licensee's capability to mitigate internal and external flooding events required by station design

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
IP 71111.01	Adverse Weather Protection, External Flooding Portion	Jan 1, 2010
CR 11-92019	Turbine Building to Heater Bay Wall Penetration Blocked	Mar 30, 2011
CR 11-92037	Potential Flooding Concern HB 620	Mar 30, 2011
CR 11-92215	Degraded Intermediate Building Floor Penetrations	Apr 1, 2011
CR 11-92301	Flooding Vulnerability for Items Stored at and near Swale	Apr 4, 2011
CR 11-92425	Vulnerability for Flood Barriers at Safety Electrical Manholes	Apr 6, 2011
CR 11-92555	Penetration Seals not Inspected due to Location or Rad Levels	Apr 8, 2011

03.04 Assess the thoroughness of the licensee's walkdowns and inspections of important equipment needed to mitigate fire and flood events to identify the potential that the equipment's function could be lost during seismic events

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
IP 71111.21	Component Design Bases Inspection	Dec 6, 2010
ONI-P54	Fire	Rev. 15
SOI-P54	Fire Protection Systems – Water	Rev. 15
CR 11-92349	Scaffold Laydown Areas on IB 599' could Impact Fire Piping	Apr 5, 2011
CR 11-92350	Three Scaffold Builds Noted to be Built around/near Fire Protection Piping	Apr 5, 2011
CR 11-92352	Fire Protection Valve Packing Leaks Identified	Apr 5, 2011
CR 11-92355	Fire Protection Piping Leaks Identified	Apr 5, 2011
CR 11-92365	Control Complex Scaffold Storage Area	Apr 5, 2011
CR 11-92366	Control Complex Scaffold Near Fire Piping	Apr 5, 2011
CR 11-92410	ESW Pump House Fire Piping Walkdown Identified Minor Deficiencies	Apr 6, 2011
CR 11-92464	Some Equipment Racks in SB-620 Brigade Station may Topple in a Seismic Event. Should be Fastened to Wall	Apr 7, 2011
CR 11-92557	Walkdowns of Seismic Qualified Suppression Equipment is Needed	Apr 8, 2011

LIST OF ACRONYMS USED

ADAMS	Agencywide Documents Access and Management System
CAP	Corrective Action Program
CFR	<i>Code of Federal Regulations</i>
CR	Condition Report
ERO	Emergency Response Organization
IP	Inspection Procedure
NRC	Nuclear Regulatory Commission
ONI	Off-Normal Instruction
SAG	Severe Accident Guideline
SBO	station blackout
SPI	Special Plant Instruction
TI	Temporary Instruction

M. Bezilla

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Sincerely,

/RA/

Jamnes L. Cameron, Chief
Branch 6
Division of Reactor Projects

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

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Letter to M. Bezilla from J. Cameron dated May 13, 2011.

SUBJECT: PERRY NUCLEAR POWER PLANT – NRC TEMPORARY
INSTRUCTION 2515/183 INSPECTION REPORT 050000440/2011011

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