



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

August 23, 2013

Mr. Ernie Harkness
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: INFORMATION REQUEST TO SUPPORT UPCOMING PROBLEM
IDENTIFICATION AND RESOLUTION (PI&R) INSPECTION AT
THE PERRY NUCLEAR POWER PLANT**

Dear Mr. Harkness:

This letter is to request information to support our scheduled PI&R inspection beginning November 4, 2013, at the Perry Nuclear Power Station. This inspection will be performed in accordance with the U.S. Nuclear Regulatory Commission (NRC) Baseline Inspection Procedure 71152.

Experience has shown that these inspections are extremely resource intensive both for the NRC inspectors and the utility staff. In order to minimize the impact that the inspection has on the site and to ensure a productive inspection, we have enclosed a list of documents required for the inspection.

The documents requested are copies of condition reports and lists of information necessary to ensure the inspection team is adequately prepared for the inspection. The information requested prior to the inspection may be provided in either CD-ROM/DVD (preferred) or hard copy format and should be ready for NRC review by October 11, 2013.

If there are any questions about the material requested, or the inspection in general, please contact the lead inspector, Mr. John Jandovitz, at 630-829-9763 or john.jandovitz@nrc.gov.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, Control Number 3150-0011.

The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

E. Harkness

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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 available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room). (the Public Electronic Reading Room).

Sincerely,

/RA/

Michael A. Kunowski, Chief
Branch 5
Division of Reactor Projects

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

Enclosure: Requested Information to Support PI&R Inspection

cc w/encl: Distribution via ListServ™

**Requested Information to Support
Problem Identification and Resolution (PI&R) Inspection**

Inspection Report 05000440/2013007

Please provide the information on a compact disc (one for the team lead, one for the Resident Inspector Office, and one for each of the two other scheduled inspectors), if possible. Unless otherwise specified, the time frame for requested information is for the period of November 1, 2011, through the time the data request is answered. For requested lists please provide the information, if possible, in a “sortable” Excel spreadsheet format.

In addition, inspectors will require computer access to the corrective action program (CAP) database while on site.

PROGRAM DOCUMENTS

1. A current copy of administrative procedure(s) for the corrective action program (CAP), quality assurance audit program, self-assessment program, corrective action effectiveness review program, trending program, industry experience review program, and top-level documents for the work control and work scheduling programs.
2. A current copy of the Employee Concerns Program/Ombudsman administrative procedure(s).
3. Description of any substantive changes made to the corrective action program since the last PI&R Inspection. Please include with each listed change the effective date of the change.

ASSESSMENTS

4. A copy of Quality Assurance (QA) audits of the corrective action program.
5. A list of all other QA audits completed with a brief description of areas where findings requiring corrective action were identified.
6. The plan for future self-assessments of the CAP and a copy of your schedule for future assessments, out to no more than two years.
7. A copy of completed self-assessments of the CAP.
8. A list of all other self-assessments completed with a brief description. Indicate which assessments resulted in CRs for adverse findings.
9. A list of condition reports (CRs) written for findings or concerns identified in self-assessments and audits that required follow-up action. Include a short description of the finding, its status, and include a cross-reference to the audit or self-assessment number.

CORRECTIVE ACTION DOCUMENTS

10. A list of completed root cause evaluations completed with a brief description of the issue. Provide status of any actions developed as part of the evaluations and a reference, if not part of the root cause package, to the documents and/or CRs directing and tracking the actions.
11. A list of completed apparent cause evaluations completed with a brief description of the issue. Provide status of any actions developed as part of the evaluations and a reference, and if not part of the root cause package, to the documents and/or CRs directing and tracking the actions. Please identify if the apparent cause evaluations were full or limited evaluations.
12. A list of all **open** condition reports sorted by significance level and then initiation date. Include each report's identification number, the date initiated, a brief description/title of the issue, system affected if any, significance level, priority level, assigned organization, and anticipated completion date, if available.
13. A list of condition reports **closed**, sorted by significance level and then initiation date. Include each report's identification number, a brief description/title, the significance level, the priority level, the date initiated and closed, assigned organization, system affected, cause codes assigned, and whether there was an associated operability evaluation.
14. A list of condition reports generated by the corporate office that involve or affect Perry's operation, sorted by significance level. Include the date initiated, a brief description/title of the issue, other site(s) affected, system affected, significance level, status, assigned organization, and closure date or anticipated completion date, if available.
15. A list of completed effectiveness reviews of CR-developed remedial and corrective actions with a brief description of the results of those reviews. Include a cross-reference to the CR or CRs for which the effectiveness review was conducted and, if applicable, CR numbers documenting any additional follow-up actions.
16. A list of condition reports initiated for identified inadequate or ineffective corrective or remedial actions. Include the date initiated, a brief description, status, significance level of the issue, system affected, assigned organization, priority level to correct, completion/closure date or, if applicable, anticipated completion date, if available. Include a cross-reference to the CR, CRs, or evaluation that generated the original corrective action.
17. A copy of any performance reports or indicators used to track the corrective action program effectiveness for the past 24 months. The most recent data and end-of-quarter data will suffice; monthly reports are not required.
18. A list of condition reports issued during the past refueling outage sorted by system and component, including a brief description, status, significance level, priority level for each item, identifying and assigned organization(s), and actual or anticipated closure date.

TRENDS

19. A list of initiated condition reports that identify trends of conditions adverse to quality. Include the date initiated, a brief description, significance level, priority level for each item, and date closed or anticipated closure date.
20. Copies of any completed CAP trend reports.

OPERATING EXPERIENCE

21. A copy of the most recent operating experience program effectiveness review.
22. A list of operating experience documents reviewed and any associated condition reports. Please provide identification of the originating organization, the initiating organization's document/reference number, a brief description/title of the issue, and status of the review and any developed follow-up actions. Indicate the initiation date and the closure date or the anticipated closure date if available.

SYSTEMS AND COMPONENTS

23. A list of the top ten risk significant systems and top ten risk significant components.
24. A list of operability determinations/evaluations. Include a brief description/title of the issue, date initiated, date closed or date anticipated to be closed. Include any operability evaluations that are still open and that were initiated prior to January 1, 2012.
25. Cause analysis, corrective actions documents, health reports, and trend analysis for systems and components considered Maintenance Rule (a)(1) at any time since January 1, 2012. Provide this information starting one year earlier from when the system or component entered (a)(1) status. Include dates when system/components entered (a)(1) status and, if applicable, returned to (a)(2) status. For recurring reports, quarterly reports are sufficient; monthly reports are not required.
26. A list of test failures (IST or Technical Specifications surveillances) with a brief description of component/system failed. Indicate if the failure was a maintenance preventable failure. Please include any failures of test equipment calibrations that necessitated a review of past surveillances and/or tests.
27. A list of temporary modifications with a brief description of the modification, installation date, and date closed or anticipated closure date. Include any open temporary modifications that were installed prior to January 1, 2012.
28. A list of rework items and repeat failures. Include cross-references to applicable Work Orders and CRs.
29. A list of plant trips, downpowers (greater than 20 percent), LCO entries (not scheduled), and LERs, including dates of these events.

30. A list of open work orders with a brief description. Identify the work order as outage or non-outage, the date of initiation and scheduled or anticipated closure date, if available. Also provide the classification of the work orders with the recent industry classification scheme. Provide an explanation of the classification scheme and the procedure governing the classification.
31. Any trend reports for work orders. Trend reports that existed at the end of each calendar quarter are acceptable; copies of all monthly reports are not required.

SCWE

32. Results of safety culture/safety conscious work environment (SCWE) surveys or self-assessments completed since January 1, 2011. Also any actions resulting from the survey and the status of the action.
33. SCWE issues identified through alternate avenues, such as the employee concerns programs. If issue(s) are considered sensitive, in lieu of describing issue in the data package, provide a paper copy to the lead inspector at the start of the inspection.

REGULATORY ISSUES

34. Copies of all apparent, common and/or root cause evaluations related to identified adverse human performance trends.
35. Copies of condition reports, investigations, and corrective actions taken for issues identified in NRC findings since October 1, 2011. Identify the status of the corrective actions and any effectiveness reviews completed or scheduled. Include a copy of effectiveness reviews that were done. Items for NRC White findings should be segregated as noted below (request numbers 42 through 44).

ADMIN

36. A copy of the latest Perry Nuclear Power Plant organizational chart and phone listing.
37. A list of the dates, times, and location for all scheduled meetings associated with the implementation of the CAP. Include any work order screening meetings.

5-YEAR SYSTEM REVIEW

38. An excel sortable list of condition reports associated with your Unit 1 Main Transformer, 1-PY-T, the Unit 1 Aux Transformer, 110-PY-B, and the Unit 2 Start-up Transformer, 200-PY-B, going back to July 1, 2008. Please indicate in the list the status of the CR (e.g. open, closed, working, etc.), initiation date, closure date, number of developed corrective actions and indication if any remain open, the classification/priority, and a descriptive title of the CR, and the actual system or subsystem of the plant's permanently installed compressed air systems.

39. A copy of site performance indicators (PIs), if any, associated with the Unit 1 Main Transformer, the Unit 1 Aux Transformer and the Unit 2 Start-up Transformer going back to July 1, 2008. Only need to provide a copy of recurring PIs for every 6 months (i.e. 2 representative sets of each PI for 2012, 2 for 2011, etc. – for a total of approximately 10 sets of each PI).
40. A copy of the System Health report sections for Unit 1 Main Transformer, the Unit 1 Aux Transformer and the Unit 2 Start-up Transformer, and their subsystems, as they were presented in the second and fourth quarter reports of each year starting in 2008 until the current date.
41. A copy of any Maintenance Rule Action plans (a)(1) action plans with completion status for the Unit 1 Main Transformer, the Unit 1 Aux Transformer and the Unit 2 Start-up Transformer, or their subsystems, that were developed since July 1, 2008.

Extent of Cause Corrective Actions

42. A list of the root and contributing causes identified in your evaluations of the occupational radiation protection White findings and performance indicator occurrences that were the subject of the NRC supplemental 95002 inspection
43. The corrective actions identified for each of the extent of cause evaluations conducted for the issues in item 42.
44. Documentation of the status, completion, and effectiveness reviews of these corrective actions.
45. Copies of condition reports, investigations, and corrective actions related to the actions identified in item 43.
46. A list of condition reports that have the same cause as any of the causes identified in the extent of cause evaluations since June 1, 2011. The list should be sorted by the applicable cause. If the CR has more than one of the applicable causes, it should be shown on the list for each of the applicable causes.
47. A copy of evaluations or trends conducted to determine if the extent of cause evaluations conducted for item 42 would be different if performed now.

Documents requested to be available on-site during the inspection:

- a. Updated Final Safety Analysis Report.
- b. Technical Specifications.
- c. Procedures and procedure index.
- d. Copies of any self-assessments and associated condition reports generated in preparation for the inspection.
- e. A copy of the QA manual.

- f. A list of issues brought to the ECP/ombudsman and the actions taken for resolution.
- g. A list of the codes used in the CAP and Work Orders.
- h. A copy of the most recent monthly performance indicator document and the system health report and the equivalent documents from the end of the fourth quarter of 2011.
- i. A copy of the latest independent/offsite organization review of safety culture/safety conscious work environment and internal equivalent assessments if not provided as part of the requested data package.

Other:

On the first day of the inspection, or early on the second day, please provide the inspection team a briefing of your CAP. Include your expectations for personnel using the program and how the work order system fits into the overall scheme for addressing identified issues. Also please demonstrate how to use a computer to access CAP data.

The lead inspector will also request to talk to/interview 20 to 30 personnel and seek information about the plant's SCWE. The lead inspector will randomly choose people for these discussions during in the shop or field environment, targeting about 6 people per day. The lead inspector will discuss with your coordinator how best meet with your personnel for these discussions. Each discussion is expected to last about 20 to 30 minutes.

E. Harkness

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Sincerely,

/RA/

Michael A. Kunowski, Chief
Branch 5
Division of Reactor Projects

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

Enclosure: Requested Information to Support PI&R Inspection

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DOCUMENT NAME: Perry 2013 PI&R

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Letter to E. Harkness from M. Kunowski dated August 23, 2013

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IDENTIFICATION AND RESOLUTION (PI&R) INSPECTION AT
THE PERRY NUCLEAR POWER PLANT

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DRPIII

DRSIII

Patricia Buckley

Tammy Tomczak

ROPAssessment.Resource@nrc.gov