



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

June 2, 2015

Mr. Ernest 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
PERRY NUCLEAR POWER PLANT**

Dear Mr. Harkness:

This letter is to request information to support our biennial PI&R inspection beginning July 20, 2014, at the Perry Nuclear Power Plant. 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 performance reports and lists of information necessary to ensure the inspection team is adequately prepared for the inspection. The documents should be ready for NRC review by July 6, 2015. Mr. John Jandovitz, the Lead Inspector, will contact your staff to determine the best method of providing the requested information.

If there are any questions about the material requested, or the inspection in general, please do not hesitate to call or e-mail Mr. 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 Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the 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).

Sincerely,

/RA/

Michael Kunowski, Chief
Branch 5
Division of Reactor Projects

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

Enclosure:
RFI to Support PI&R Inspection

cc w/encl: Distribution via LISTSERV®

Requested Information to Support Problem Identification and Resolution Inspection

Please provide the information on a compact disc or thumb drive (one for each of three team members), if possible. Unless otherwise specified, the time frame for requested information is for the period of January 1, 2013, through the time the data request is answered. Please label any electronic files with file content information. In the case of list of condition reports requested, the list should be sortable electronically.

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

PROGRAM DOCUMENTS

1. Copies of current administrative procedures associated with the corrective action program. This should include procedures related to: (1) corrective action process; (2) operating experience program; (3) self-assessment program; (4) maintenance rule program; (5) operability determination process; (6) degraded/non-conforming condition process (e.g., RIS 2005-20); (7) system health process or equivalent equipment reliability improvement programs; and (8) operational decision making (ODMI) process.
2. A current copy of the Employee Concerns Program/Ombudsman administrative procedure.
3. Description of any substantive changes made to the CAP since the last Problem Identification and Resolution (PI&R) Inspection. Please include the effective date with each listed change.

ASSESSMENTS

4. A copy of Quality Assurance (QA) audits of the corrective action program.
5. A copy of self-assessments and associated condition reports generated in preparation for this PI&R inspection.
6. A list of all other QA audits completed with a brief description of areas where findings were identified.
7. The schedule of future QA audits.
8. A copy of completed CAP self-assessments and the plan/schedule for future CAP self-assessments.
9. A chronological list of department and site self-assessments completed (include date completed).
10. A list of condition reports (CRs) written for findings or concerns identified in self-assessments and audits. Include a short description/title of the finding, its status, and include a cross-reference to the audit or self-assessment number.

Enclosure

CORRECTIVE ACTION DOCUMENTS

11. A list of completed root cause evaluations with a brief description of the issue. Provide status of any actions developed as part of the evaluations. Include a reference, if not part of the root cause package, to the documents and/or CRs directing and tracking the actions.
12. A list of completed apparent cause evaluations with a brief description of the issue. Provide status of any actions developed as part of the evaluations. Include a reference, if not part of the apparent cause package, to the documents and/or CRs directing and tracking the actions.
13. A list of all open CRs sorted by significance level. Include CR number, the date initiated, a brief description/title, system affected if any, significance level, and anticipated completion date, if available. This list should be grouped by responsible department and listed in order of initiation date (oldest listed first).
14. A list of closed CRs sorted by significance level and then initiation date. Include CR number, a brief description/title, the significance level, the date initiated and closed, assigned organization, system affected and whether there was an associated operability evaluation.
15. A list of open corrective actions, sorted by significance/priority level, with a brief description/title, initiating date and due date. The list should include the number of due date extension and be grouped by the responsible department.
16. A list of CRs generated by the corporate office that involve or affect plant operation, sorted by significance level. Include the date initiated, a brief description/title, site(s) affected, system affected, significance/priority level, assigned organization, and status (if closed include date closed; if open, include scheduled date to be closed).
17. A list of completed effectiveness reviews with a brief description of the results. Include a cross-reference to the CRs for which the effectiveness review was conducted and, if applicable, CR numbers documenting any additional follow-up actions.
18. A list of CRs initiated for inadequate or ineffective corrective actions. Include the date initiated, a brief description/title, significance/priority level, system affected, assigned organization, and status (if closed include date closed; if open, include scheduled date to be closed). Include a cross-reference to the CR or evaluation that generated the original corrective action.
19. A copy of any performance reports or indicators used to track CAP effectiveness for the past 24 months. The most recent data and end-of-quarter data will suffice; monthly reports are not required.
20. A data table (or similar format) showing the total number of CRs generated per year since 2010 sorted by department (i.e., operations, engineering, security etc.).
21. A data table showing the number of issues identified externally (NRC, INPO, other etc.) per year as compared to internally since 2010.

TRENDS

22. A list of CRs initiated for trends of conditions adverse to quality. Include the date initiated, a brief description/title, significance/priority level, and status (if closed include date closed; if open, include scheduled date to be closed).
23. Copies of any completed trend reports for CRs. Quarterly trend reports are acceptable; copies of all monthly reports are not required.

OPERATING EXPERIENCE

24. A list of CRs initiated to evaluate NRC generic communications (e.g., bulletins, information notices, generic letters, etc.). Include date the CR was initiated, a brief description/title, and the status (if closed include date closed; if open, include scheduled date to be closed).

SYSTEMS AND COMPONENTS

25. A list of the top ten risk significant systems and top ten risk significant components.
26. A list of operability 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 June 1, 2013.
27. A listing of cause analyses, corrective actions documents, and trend analyses for systems and components considered Maintenance Rule (a)(1) at any time since June 1, 2013. Provide copies of the applicable system health report sections and maintenance rule action plans for those systems starting 1 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, the most recent and middle-of-year and end-of-year reports are sufficient; monthly reports are not required.
28. 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.
29. 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 June 1, 2013.
30. A list of rework items and repeat failures. Include cross-references to applicable Work Orders and IRs.
31. A list of plant trips, unplanned downpowers (greater than 20 percent), limiting condition for operation entries (not scheduled), and licensee event reports, including dates of these events.
32. A list of open work orders/equipment work requests 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. Work requests/work orders not associated with a degraded equipment condition (e.g., work orders for voluntary plant upgrades) do not have to be included in the list.

33. A copy of any trend reports for work orders. The most recent trend reports and those that existed at the end-of-year and middle-of-year are acceptable; copies of monthly reports are not required. Include a copy of a recent (within 2 months of the data submittal) graph or document showing the status of work week planning of work activities.

SCWE

34. Copy of the results of safety culture and/or safety conscious work environment (SCWE) surveys or self-assessments completed since January 1, 2013. Include any organizational effectiveness surveys conducted by internal or external organizations. Include a listing of any action(s) resulting from the survey(s) and the status of the action(s).
35. 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

36. A list of CRs for issues (findings, violations, etc.) documented in NRC inspection reports. Include the CR number, brief description/title, date initiated and the status (if closed include date closed; if open, include scheduled date to be closed).
37. A list of CRs for licensee identified violations that have been documented in NRC inspection reports. Include the CR number, brief description/title, date initiated and the status (if closed include date closed; if open, include scheduled date to be closed).
38. A list of CRs associated with NRC identified issues. Include the CR number, brief description/title, date initiated and the status (if closed include date closed; if open, include scheduled date to be closed).
39. A list of degraded/non-conforming conditions. Include the CR number, brief description/title, date initiated and date closed or projected closeout date. Include open issues that were identified prior to January 1, 2013.
40. A list of current control room deficiencies and operator work-arounds, sorted by priority, with a brief description/title and corresponding CR and/or work order number.

5-YEAR REVIEW

41. A list of CRs regarding the Materials and Test Equipment (M&TE) program and its' implementation since January 1, 2010. Include the CR number, brief description/title, level of evaluation (i.e., root cause, apparent cause, common cause etc.), date initiated,

and the status (if closed include date closed; if open, include scheduled date to be closed).

42. The procedure related to control and implementation of the M&TE program.
43. Copies of assessments, Quality Assurance reviews, and other evaluations of the M&TE program implementation.

ADMIN

44. A copy of the latest plant organizational chart and phone listing.
45. Scheduled dates, times, and location for all meetings associated with implementing the CAP (e.g., CR screening meetings, corrective action review board meetings). Include work order screening/assessment meetings.

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. A copy of the QA manual.
- e. A list of issues brought to the ECP/ombudsman and the actions taken for resolution.
- f. A list of the codes used in the CAP.
- g. 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.
- h. A hard copy of the mechanical and electrical drawings associated with the instrument air system.

OTHER

On the first day of the inspection, or early on the second day, please provide the inspection team a briefing of your corrective action program. Include your expectations for personnel using the program and how the work order system fits into the overall scheme for addressing identified issues.

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Michael Kunowski, Chief
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