



UNITED STATES
NUCLEAR REGULATORY COMMISSION

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

March 26, 2019

Mr. David B. Hamilton
Site Vice President
FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant
Reg Affairs–A210
10 Center Road, P.O. Box 97
Perry, OH 44081–0097

SUBJECT: PERRY NUCLEAR POWER PLANT—INFORMATION REQUEST FOR AN
NRC TRIENNIAL 10 CFR 50.59 (EVALUATION OF CHANGES, TESTS
AND EXPERIMENTS) BASELINE INSPECTION; INSPECTION
REPORT 05000440/2019012

Dear Mr. Hamilton:

On August 12, 2019, the U.S. Nuclear Regulatory Commission (NRC) will begin a Title 10 of the *Code of Federal Regulation*, Part 50.59, (Evaluation of Changes, Tests and Experiments), baseline inspection at your Perry Nuclear Power Plant. This inspection will be performed in accordance with the NRC Baseline Inspection Procedure 71111.17T. The onsite portions of the inspection will take place on August 12–16, 2019.

Experience has shown that these baseline inspections are extremely resource intensive, both for the NRC inspectors and the licensee staff. In order to minimize the inspection impact on the site and to ensure a productive inspection for both parties, we have enclosed a request for documents needed for the inspection. These documents have been divided into three groups.

- The first group of information is necessary to ensure that the inspection team is adequately prepared for the inspection. This information should be made available via compact disc and delivered to the regional office no later than June 7, 2019. The inspection team will review this information and, by June 14, 2019, will request specific items that should be provided for review in the regional office by July 26, 2019.
- The second group of requested documents contains additional items that the team will review, or need access to, during the inspection. Certain documents contained within Group II (i.e., Item (1)), will be requested for review in the regional office prior to the inspection by July 26, 2019, as identified above. The remaining documents should be available by the first day of the onsite inspection, August 12, 2019.
- The third group lists information necessary to aid the inspection team in tracking issues identified as a result of the inspection. It is requested that this information be provided to the lead inspector as the information is generated during the inspection. It is important that all of these documents are up to date and complete in order to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection.

The lead inspector for this inspection is Mr. Alan Dahbur. We understand that our regulatory contact for this inspection is Mr. George Dujanovic of your organization. If there are any questions about the inspection or the material requested, please contact the lead inspector at 630-829-9810 or via e-mail at Alan.Dahbur@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.

This letter and its enclosure will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulation*, Part 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Alan Dahbur, Senior Reactor Inspector
Engineering Branch 3
Division of Reactor Safety

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

Enclosure:
Document Request for 10 CFR 50.59
Baseline Inspection

cc: Distribution via LISTSERV®

Letter to David Hamilton from Alan Dahbur dated March 26, 2019.

SUBJECT: PERRY NUCLEAR POWER PLANT—INFORMATION REQUEST FOR AN
NRC TRIENNIAL 10 CFR 50.59 (EVALUATION OF CHANGES, TESTS
AND EXPERIMENTS) BASELINE INSPECTION; INSPECTION
REPORT 05000440/2019012

DISTRIBUTION:

Michael McCoppin
RidsNrrPMPerry Resource
RidsNrrDorLpl3
RidsNrrDirslrib Resource
Darrell Roberts
John Giessner
Jamnes Cameron
Allan Barker
DRPIII
DRSIII

ADAMS Accession Number: ML19085A502

OFFICE	RIII						
NAME	ADahbur:cl						
DATE	03/26/19						

OFFICIAL RECORD COPY

DOCUMENT REQUEST FOR 10 CFR 50.59 BASELINE INSPECTION

Inspection Report: 05000440/2019012

Inspection Dates: August 12–16, 2019

Inspection Procedure: 71111.17T, “Evaluations of Changes, Tests and Experiments”

Lead Inspector: Alan Dahbur
630-829-9810
Alan.Dahbur@nrc.gov

I. Information Requested for In-Office Preparation Week

The following information is requested by June 7, 2019, or sooner, to facilitate the selection of specific items that will be reviewed during the onsite inspection week. The inspection team will select specific items from the information requested below and submit a list to your staff by June 14, 2019. We will request that certain items be made available to the regional office prior to the inspection by July 26, 2019. We request that the remaining items selected from the lists be available and ready for review on the first day of inspection. All requested information should identify the associated system and cover the time frame from the receipt of information for the last 50.59 inspection to the present.

The required information identified below should be provided on compact disc (CD) or uploaded to accessible links. Please provide three copies of each CD submitted (i.e., one for each inspector, if applicable). The preferred file format is a searchable “pdf” file. The CDs should be indexed and hyper-linked to facilitate ease of use, if possible. If you have any questions regarding this information, please call the inspection team leader as soon as possible.

- (1) List of all Title 10 of the *Code of Federal Regulations* (CFR), Part 50.59 completed evaluations involving: (a) calculations, (b) procedure revisions, (c) changes to the facility (modifications), (d) non-routine operating configurations, or (e) departures in methods of analyses. This list should include 50.59 evaluations for the following:
 - a. Changes that have been made under the provisions of 10 CFR 50.59 that have been updated in accordance with 10 CFR 50.71(e)(4) since the last 50.59 inspection;
 - b. Modifications that are field work complete; and
 - c. Changes to calculations (or initiation of new calculations) that have been issued. The list should contain the number and title of each document, a brief description of the change, and the corresponding number and type of the affected document (i.e., the modification or procedure to which the evaluation applies). The list should NOT include any evaluations in which prior U.S. Nuclear Regulatory Commission approval was sought and obtained.

Enclosure

DOCUMENT REQUEST FOR 10 CFR 50.59 BASELINE INSPECTION

- (2) A list of all 10 CFR 50.59 changes that have been screened out as not requiring a full evaluation involving: (a) calculations; (b) procedure revisions; (c) changes to the facility (modifications); (d) non-routine operating configurations; or (e) departures in methods of analyses.

The list should contain the number and title of each document, a brief description of the change, and the corresponding number and type of the affected document (i.e., the modification or procedure to which the evaluation applies).

- (3) A list of any modifications, procedure revisions, or Updated Final Safety Analysis Report (UFSAR) changes where it was determined that 10 CFR 50.59 did not apply.
- (4) A list of calculation changes that have been issued for use.
- (5) A list of corrective action documents (open and closed) that address 10 CFR 50.59 issues, concerns, or processes. These documents should also include the associated corrective action documents and the 50.59 change implementation.

The list should contain the number, title and revision (or date) of each document, the affected system and corresponding documentation (if applicable), and should be sorted in order of significance.

- (6) Copies of procedures addressing the following: modifications, design changes, set point changes, equivalency evaluations or suitability analyses, commercial grade dedications, post-modification testing, 10 CFR 50.59 evaluations and screenings, and UFSAR updates.
- (7) UFSAR updates submitted in accordance with 10 CFR 50.71(e)(4). Provide copies of the complete submittal.
- (8) Copy of the UFSAR change log or a synopsis of the changes. This should include all of the changes made to the UFSAR that were incorporated in the last 10 CFR 50.71(e)(4) submittal.
- (9) Electronic copy of the UFSAR and Bases, and technical specifications, if available.
- (10) Name(s) and phone numbers for the regulatory and technical contacts.
- (11) Current management and engineering organizational chart.

II. Information Requested to be Available Prior to Inspection. Requests will be Made for Specific Item (1) Documents by June 14, 2019, for Availability of Requested Item (1) Documents in Regional Office by July 26, 2019, and Items (2), (3) and (4) Documents on First Day of Inspection (August 12, 2019)

- (1) Copies of all selected items from Section I. This includes copies of associated documents such as calculations, post-modification test packages, 10 CFR 50.59 evaluations or screenings, and any corrective action documents.

DOCUMENT REQUEST FOR 10 CFR 50.59 BASELINE INSPECTION

- (2) Copies of these documents do not need to be solely available to the inspection team as long as the inspectors have easy and unrestrained access to them.
 - a. UFSAR, if not previously provided;
 - b. Original Final Safety Analysis Report Volumes;
 - c. Original Safety Evaluation Report and Supplements;
 - d. Final Safety Analysis Report Question and Answers;
 - e. Quality Assurance Plan;
 - f. Technical Specifications, if not previously provided;
 - g. Latest Probabilistic Risk Assessment Report;
 - h. Vendor Manuals; and
 - i. The latest 10 CFR 50.59 UFSAR Update Submittal.
- (3) Please ensure that other supporting documents for the selected items have been located and are readily retrievable as the inspection team will likely be requesting these documents during the inspection. Examples of supporting documents are:
 - a. Drawings supporting the modifications;
 - b. Procedures affected by the modifications; and
 - c. UFSAR change papers generated due to a 10 CFR 50.59 evaluation.
- (4) Assessment and Corrective Actions:
 - a. The most recent 50.59 Quality Assurance audit and/or self-assessment; and
 - b. Corrective action documents (e.g., condition reports, including status of corrective actions) generate as a result of the most recent 50.59 Quality Assurance audit and/or self-assessment.

III. Information Requested to be provided throughout the inspection

- (1) Copies of any corrective action documents generated as a result of the inspection team's questions or queries during this inspection.
- (2) Copies of the list of questions submitted by the inspection team members and the status/resolution of the information requested (provide daily during the inspection to each inspection team member).

If you have any questions regarding the information requested, please contact the inspection team leader.