



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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PERRY NUCLEAR POWER PLANT

March 8, 1990  
PY-CEI/NRR-1148 L

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

Perry Nuclear Power Plant  
Docket No. 50-440  
Response to Notice of  
Open Item 50-440/89029-01

Gentlemen:

This letter acknowledges receipt of the Open Item contained within Inspection Report 50-440/89-029 dated February 6, 1990. The report identified areas examined by Mr. M. Kunowski during his inspection conducted on December 27-28, 1989, and January 2-12, 1990 of operational radiation protection and radioactive waste program activities at the Perry Nuclear Power Plant, Unit 1.

Our response per your request in the inspection report cover letter, to Open Item 50-440/89029-1, is provided in Attachment 1.

If you have any questions, please feel free to call.

Very truly yours,

Al Kaplan  
Vice President  
Nuclear Group

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50-440/89-029-01  
Restatement of Open Item

A review of RORs written in 1989 indicated a recurrent problem with unsecured doors to high radiation areas requiring locked doors, several problems with operators entering high radiation areas but not adhering to requirements, and several problems with control of keys to locked high radiation areas. Although exposures resulting from these problems have been low, and corrective actions were taken for each problem, the repetitive nature of the problems indicate that the corrective actions have not been properly focused or stringent enough. According to licensee personnel, additional corrective actions are planned. Overall, the repetitive problems represent a weakness in the licensee's control of locked high radiation areas. The effectiveness of the licensee's additional actions will be reviewed at a future inspection (Open Item No. 440/89029-01).

Response including corrective actions taken

Following the first breach of administrative controls of Locked High Radiation Areas on March 14, 1989, the root cause was considered to be inadequate training. Corrective actions taken to prevent recurrence of a similar event included increasing the emphasis on high radiation area access control and entry requirements in initial and requalification Radiological Controls Training classes.

Subsequent to Perry's first refuel outage, additional breaches of administrative controls of Locked High Radiation Areas occurred between September and November, 1989. In response to these events, the General Manager, Perry Plant Operations Department and Director, Perry Plant Technical Department issued a memorandum on November 22, 1989 to all site section managers directing them to emphasize to their personnel the importance of Locked High Radiation Area access control and assuring that gates/doors used to control the entrances to these areas were closed and latched after passage. Concurrently, placards were placed on all gates/doors controlling entrances to Locked High Radiation Areas reminding workers to ensure that gates/doors were closed and latched after passage.

Concurrent and subsequent to Inspector Kunowski's inspection, the following additional corrective actions were taken to reduce entries to Locked High Radiation Areas and to provide PNPP

management with a better means to identify individuals not complying with Perry's access control requirements to Locked High Radiation Areas.

1. The Radiation Protection Manager met with Health Physics personnel, and the Plant Health Physicist and Operations Superintendent met with Operations personnel as part of continuous training to emphasize entry and access control requirements for high radiation areas. Additionally, during these training sessions, the Health Physics and Operations crews met in joint sessions with the Plant Health Physicist and Operations Superintendent to discuss better methods of access control.
2. All permanently issued master keys were recalled from the Health Physics Staff.
3. Key issue requirements for entrance to Locked High Radiation Areas were changed to require issuance of unique keys in place of 1-3 rem/hr master keys which were previously issued. Health Physics and Operations personnel are issued master keys for use during each shift upon approval of the on-shift Health Physics Supervisor.
4. Movement of contaminated area step-off pads to outside of Locked High Radiation Area gates/doors wherever practical, to reduce the need for entry to empty used laundry and waste receptacles.
5. Entry into Locked High Radiation Areas was prohibited on general radiation work permits with the exception of Health Physics and Operations crew personnel.

Further corrective actions to be taken to ensure administrative program compliance

The Vice President, Nuclear will emphasize the importance of Locked High Radiation Area access control during upcoming meetings with all site personnel. These meetings are currently scheduled for the month of March.

PNPP management expects that implementation of the corrective actions delineated above will ensure compliance of Perry's Locked High Radiation Administrative Program requirements. We will continue to closely monitor this area and evaluate the effectiveness of corrective actions implemented to reverse this trend.