



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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Al Kaplan

VICE PRESIDENT  
NUCLEAR GROUP

*Serving The Best Location in the Nation*  
PERRY NUCLEAR POWER PLANT

March 9, 1990  
PY-CEI/NRR-1147 L

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

Perry Nuclear Power Plant  
Docket No. 50-440  
Regulatory Impact Survey  
(Generic Letter 90-01)

Gentlemen:

You requested data on management time spent on various inspections and audits which are imposed by various government and private organizations listed in the Generic Letter. Instructions provided were later modified by a February 16, 1990 NUMARC letter. The completed Generic Letter questionnaires (attached) were accordingly revised before completion.

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

Very truly yours,

Al Kaplan  
Vice President  
Nuclear Group

AK:njc

Attachment

cc: T. Colburn  
P. Hiland

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**SUMMARY OF PNPP MANAGEMENT TIME DEMANDS**

	<u>TOTAL HOURS/YEAR</u>
NRC Team Inspections	4070
NRC Resident	2057
INPO	3340
ANI	827
PUCO	1040
QA	<u>4427</u>
	15761

**NRC REGULATORY IMPACT QUESTIONNAIRE**

1. Type of inspection, audit or evaluation: NRC Team Inspections
  
2. Based on actual experience over the past 24 months, about how often is this activity conducted? Routine inspections about 30 per year, special annual inspections (e.g. diagnostic, OSTI, AIT's etc.) 1 or 2 per year.
  
3. Operations covered: Tech Spec compliance, design control, operating occurrences
  
4. Extent of the activity (how many people, for how long): 5-16 inspectors, 1 to 4 weeks.
  
5. Approximate hours (on an annual basis) which the following managers must spend in direct involvement in response to the activity described in Item #1.
  - a. Plant Department Heads (Directors) 280 (number involved) 5
  - b. Plant Manager 40
  - c. Corporate Nuclear Department Heads 30 (number involved) 1
  - d. Vice President - Nuclear Group 50 (number involved) 1
  - e. Other Management & Supervisors 3670

**NRC REGULATORY IMPACT QUESTIONNAIRE**

1. Type of inspection, audit or evaluation: NRC Resident
  
2. Based on actual experience over the past 24 months, about how often is this activity conducted? Continuous
  
3. Operations covered: Tech Spec compliance and USAR consistency
  
4. Extent of the activity (how many people, for how long): 2 inspectors assigned on site
  
5. Approximate hours (on an annual basis) which the following managers must spend in direct involvement in response to the activity described in Item #1.
  - a. Plant Department Heads (Directors) 170 (number involved) 5
  - b. Plant Manager 35
  - c. Corporate Nuclear Department Heads 102 (number involved) 1
  - d. Vice President - Nuclear Group 15
  - e. Other Management & Supervisors 1735

NRC REGULATORY IMPACT QUESTIONNAIRE

1. Type of inspection, audit or evaluation: INPO
2. Based on actual experience over the past 24 months, about how often is this activity conducted? 1-2 evaluations per year (plant & corporate)
3. Operations covered: Plant operations, technical support, maintenance, engineering, safety review functions, QA, radiation protection, chemistry, training
4. Extent of the activity (how many people, for how long): 15-20 personnel, 2-3 weeks
5. Approximate hours (on an annual basis) which the following managers must spend in direct involvement in response to the activity described in Item #1.
  - a. Plant Department Heads (Directors) 175 (number involved) 5
  - b. Plant Manager 50
  - c. Corporate Nuclear Department Heads 50 (number involved) 1
  - d. Vice President - Nuclear Group 15
  - e. Other Management & Supervisors 3050

NRC REGULATORY IMPACT QUESTIONNAIRE

1. Type of inspection, audit or evaluation: ANI
  
2. Based on actual experience over the past 24 months, about how often is this activity conducted? Several times per year
  
3. Operations covered: Fire protection, safe shutdown
  
4. Extent of the activity (how many people, for how long): 2-3 personnel, about 3 days
  
5. Approximate hours (on an annual basis) which the following managers must spend in direct involvement in response to the activity described in Item #1.
  - a. Plant Department Heads (Directors) 16 (number involved) 5
  - b. Plant Manager 1
  - c. Corporate Nuclear Department Heads - (number involved) -
  - d. Vice President - Nuclear Group -
  - e. Other Management & Supervisors 810

NRC REGULATORY IMPACT QUESTIONNAIRE

1. Type of inspection, audit or evaluation: Public Utility Commission
  
2. Based on actual experience over the past 24 months, about how often is this activity conducted? Several times per year
  
3. Operations covered: Rate hearings and special topics
  
4. Extent of the activity (how many people, for how long): Rate hearing - 5-20 personnel up to several years, but on an infrequent schedule; other topics 5-10 personnel involved in one day site visits
  
5. Approximate hours (on an annual basis) which the following managers must spend in direct involvement in response to the activity described in Item #1.
  - a. Plant Department Heads (Directors) 110 (number involved) 5
  - b. Plant Manager 10
  - c. Corporate Nuclear Department Heads 100 (number involved) 1
  - d. Vice President - Nuclear Group 20
  - e. Other Management & Supervisors 800

**NRC REGULATORY IMPACT QUESTIONNAIRE**

1. Type of inspection, audit or evaluation: Quality Assurance
2. Based on actual experience over the past 24 months, about how often is this activity conducted? About 30 audits per year
3. Operations covered: Plant operations, maintenance, surveillance testing, and support activities within scope of USAR.
4. Extent of the activity (how many people, for how long): Typically involves 2-4 auditors over a 5 week period
5. Approximate hours (on an annual basis) which the following managers must spend in direct involvement in response to the activity described in Item #1.
  - a. Plant Department Heads (Directors) 145 (number involved) 5
  - b. Plant Manager 2
  - c. Corporate Nuclear Department Heads - (number involved)
  - d. Vice President - Nuclear Group 20
  - e. Other Management & Supervisors 4260