



**CENTERIOR  
ENERGY**

**PERRY NUCLEAR POWER PLANT**

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VICE PRESIDENT - NUCLEAR

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PY-CEI/NRR-1609 L

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

Perry Nuclear Power Plant  
Docket No. 50-440  
Reply to Notice of Violation

Gentlemen:

This letter acknowledges receipt of the Notice of Violation contained within Inspection Report 50-440/92024 dated January 21, 1993. The report identified areas examined by Region III Inspectors from November 21, 1992, through December 28, 1992.

Our response to Notice of Violation 50-440/92024-03, as required by 10CFR2.201, as well as additional information regarding actions to improve and sustain plant cleanliness, are provided in Attachment 1.

As identified in your cover letter, with respect to violations 92024-01 and 92025-02, corrective actions for these specific problems were documented in their respective Licensee Event Reports (LERs). Accordingly, a combined response to these two violations is provided in Attachment 2, and references LERs 92-021 and 92-023 (also enclosed) for the response requirements specified in 10CFR2.201 and reiterated in the Notice of Violation. Also provided in Attachment 2 is summary information regarding our overall corrective action program to reduce personnel errors.

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

Sincerely,

Robert A. Stratman

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RAS:DWC:ss

Attachments

cc: NRR Project Manager  
Sr. Resident Inspector  
USNRC Region III

Operating Companies  
Cleveland Electric Illuminating  
Toledo Edison

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PDR ADDCK 05000440  
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Restatement of Violation 50-440/92024-03

Appendix B of 10 CFR Part 50, Criterion II, requires in part, that activities affecting quality shall be accomplished under suitably controlled conditions. Controlled conditions include the use of appropriate equipment, suitable environmental conditions for accomplishing the activity, such as adequate cleanliness, and assurance that all prerequisites for the given activity have been satisfied.

Contrary to the above, between November 21 through December 11, 1992 based on inspectors observations of debris in plant areas, including the reactor core isolation cooling pump room and the reactor feed pump turbine rooms, adequate cleanliness was not maintained.

This is a Severity Level IV violation (Supplement I). (50-440/92024-03)

Reason for the violation

This violation was attributed to inadequate communication between management and workers with respect to management's expectations of standards of performance in this area. In addition, housekeeping practices of plant employees did not meet the requirements or intent of Plant Administrative Procedure (PAP-0204), "Housekeeping/Cleanliness Control Program." This procedure provides, in part, the following instructions:

"The First Line supervisors of Maintenance, Operation, Systems Engineering, I&C, Radiation Protection, support organizations, and contracted personnel shall be responsible for daily surveillance of the areas in which their assigned personnel are working in (sic); closing out the Job Specific Personnel/Material Accountability Log; and verifying, by signing for work or retest completion on Work Orders, that the equipment/area meet the requirements of the Housekeeping/Cleanliness Control Program."

"The foundation of the Housekeeping/Cleanliness Control Program is the requirement that all personnel "clean as they go." This means that conditions should not be allowed to deteriorate to a point beyond that which can be handled on a shift cleanup. Therefore, work areas shall be cleaned and straightened at least once each shift. Each worker and his Work Supervisor are responsible for their specific work area or temporary work location."

"Work areas shall be kept sufficiently clean and orderly to allow the maintenance activities or operation of adjacent equipment to proceed in an efficient manner that will produce and maintain quality. Any accumulation of material due to the maintenance or operations shall be stored neatly or removed promptly so as not to interfere with the maintenance activity."

Plant personnel had been trained to this procedure; however, over time, housekeeping practices deteriorated due largely to the lack of emphasis placed on this area by both management and employees.

Corrective steps that have been taken and the results achieved

In response to the areas specifically discussed in the Notice of Violation, both the reactor core isolation (RCIC) pump room and the reactor feed pump turbine (RFPT) rooms were cleaned. In addition, both the reactor feed pumps and the motor feed pump have recently been painted, which should further improve the appearance and general cleanliness of these areas.

Management and supervision has actively increased the level of direct involvement in supervision in plant, with the intent of providing coaching and counseling to ensure that the established policies and expectations regarding housekeeping are sufficiently implemented and enforced.

Additionally, Perry management has concluded that employee performance in this area will, in part, improve with the implementation of the enhancements identified in Attachment #2 of this response.

Corrective steps that will be taken to avoid further violations

Management and supervision have been instructed to spend more time in plant to ensure that cleanliness requirements are maintained. In addition, supervisors and workers have been reminded that they will be held accountable for their actions with respect to this area.

Dates when full compliance will be achieved

Both RCIC and RFPT pump rooms were thoroughly cleaned. Additionally, both the reactor feed pumps and the motor feed pump were painted on February 18, 1993. The plant's general cleanliness has improved during the current outage.

Restatement of Violations 92024-01 and 92024-02

Technical specification (TS) Table 4.3.1.1-1, footnote (d), requires that average power range monitors (APRMs) be calibrated during operational condition 1 when thermal power is greater than or equal to 25 percent thermal power. Table 4.3.1.1-1, footnote (d), further states that the provisions of TS 4.0.4 are not applicable if the surveillance is performed within 12 hours after reaching 25 percent thermal power.

Technical specification 4.0.4 requires, in part, that entry into an operational condition shall not be made unless the surveillance requirements associated with the limiting condition for operation have been performed within the applicable surveillance interval.

Contrary to the above, at 1:00 p.m. on November 1, 1992, after reaching 25 percent thermal power, the surveillance requirements for average power range monitor gain and channel calibration for operational condition 1, as described in technical specification Table 4.3.1.1-1 footnote (d), were not completed within 12 hours of exceeding 25 percent thermal power.

This is a Severity Level IV violation (Supplement I). (50-440/9. 4

Technical specification Table 3.3.7.5-1, action 80-a, requires that with the number of operable accident monitoring instrumentation channels less than the required number of channels shown in Table 3.3.7.5-1, restore inoperable channel to operable status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

Contrary to the above, from June 9, 1992, until November 10 1992, with the exception of some short periods in which the plant was shut down for maintenance, the number of operable accident monitoring instrumentation channels shown in Table 3.3.7.5-1, and the inoperable channel was not restored to operable status within 7 days and the plant was not in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

This is a Severity Level IV violation (Supplement I). (50-440/92024-02)

Response

As identified in your cover letter, corrective actions for these violations were documented in their respective LERs. Accordingly, please reference LERs 92-021 and 92-023 to obtain the information required by 10CFR2.201, additionally specified in the subject Notice of Violation. Summary information regarding our overall corrective action program to reduce personnel errors has also been provided below, as requested in your cover letter.

### Restatement of Information Request

The following is a restatement of an excerpt from the cover letter.

"With respect to Violations #1 and #2, we recognize that your corrective actions for these specific problems were documented in their respective Licensee Event Reports (LERs). We do not require any additional information with respect to those specific items. We do however request that you include in your response a summary of your overall corrective action program to reduce personnel errors, your timetable for full implementation, and the status of your progress towards achieving this timetable."

### Corrective Action Program To Reduce Personnel Errors

Perry has established three broad areas to address this issue; mechanisms to identify personnel errors; reports to trend and highlight personnel errors; and programs that assess causes and establish appropriate corrective actions to prevent further personnel errors. More specific details of how Perry procedurally implements these three broad areas have recently been communicated to the NRC through the NRC/Perry Management meeting process.

Over the years, management has made a concerted effort to identify and communicate standards through the issuance of administrative procedures and instructions, re-enforcement of policy at general manager and director meetings, and implementation of the five-year plan. Although these efforts have resulted in improved performance in some areas, these improvements have not been as timely or as far-reaching as desired. Therefore, in response to the number of personnel errors that continue to occur at Perry, a number of internal and external evaluation activities have recently been initiated. Although some of these evaluations are not yet complete, enough data has already been gathered to indicate that written procedures adequately describe appropriate performance expectations. It is management's conclusion that the area in greatest need of additional emphasis is the rigorous implementation by personnel of existing programs and procedures. Accordingly, management has determined that efforts for reduction in personnel errors should focus on the following enhancements:

1. An active increase in the level of direct supervision of plant activities with the intent of providing coaching and counseling to ensure that established policies and expectations are sufficiently implemented and enforced.
2. Changes to our work practices to improve personnel performance, as determined necessary through increased supervision of work activities.
3. Clear communication of expectations to workers through routine management/employee meetings, as well as written policy statements.
4. Holding each level of Perry's organization accountable for performance to established standards.

Two further actions, in addition to the enhancements delineated above, will be taken to strengthen this area of concern:

1. Implementation of a sitewide self-checking program, which is expected to be in use by July, 1993. Perry expects to utilize the Stop, Think, Act, Review (STAR) Program promoted by INPO and successfully utilized at other utilities.
2. Commissioning of an independent subcommittee of the Nuclear Safety Review Committee by the V.P. Nuclear to identify and evaluate human performance issues and to provide immediate and longer term recommendations, as well as to be a resource to line management.

#### Timetable For Reducing Personnel Errors

Perry continues to believe reduction in events caused by personnel errors is attainable; however, it is difficult to prescribe a meaningful time limit for the reduction of personnel errors. Personnel performance is considered to be a process of continuous improvement, which is the basic premise of the Centerior Total Quality Program. Accordingly, our goal will continue to be zero events caused by personnel errors.

#### Status of Progress Towards Reducing Personnel Errors

Activities have been started toward implementation of the sitewide self-checking program (STAR), which is expected to be fully implemented by July, 1993. All other enhancements and actions delineated above have already been initiated. Perry management is confident that these additional enhancements, along with our exiting written programs and procedures, will be effective in reducing events caused by personnel errors.

#### Summary

Perry management places a high priority on improving personnel performance which will result in reduction of events caused by personnel errors. It is important that our employees have all the resources necessary to perform their respective tasks, including a belief that management is there to help and support them in all aspects of their jobs. Management believes their number one priority is to create and maintain an atmosphere that employees have no choice but to take pride in every task they perform. It is our goal that employees believe that working at Perry is the best place to work in our industry. As this is achieved, events caused by personnel errors will be drastically reduced.