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VICE PRESIDENT - NUCLEAR

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

Perry Nuclear Power Plant
Docket No. 50-440
Perry Plant SALP 12 Response

Gentlemen:

This letter provides the Cleveland Electric Illuminating Company's response to the Systematic Assessment of Licensee Performance (SALP) report for the Perry Nuclear Power Plant, Unit 1, covering the period of November 1, 1991 through January 31, 1993. This period included Refuel Outage 3, and a major part of the fourth operating cycle. This response supplements our comments on the SALP 12 report expressed during a meeting with the NRC on April 8, 1993, and addresses concerns identified in your letter dated March 31, 1993.

CEI was encouraged to again receive the highest rating in the functional areas of Security and Emergency Preparedness, and and we appreciate the NRC's recognition of excellence in these areas. On the other hand, we share the NRC's concern regarding the overall performance decline from the previous assessment period in other functional areas.

The SALP Category 2 ratings in the areas of Maintenance/Surveillance, Radiological Controls, and Engineering/Technical Support, and the Category 3 rating in Safety Assessment/Quality Verification clearly illustrate the reasons for our shared concern. The performance represented by the ratings coupled with the specific concerns noted in these functional areas, indicate the need for improvement in the effective management of personnel performance. The NRC perspective confirms to CEI the appropriateness of actions that have already been initiated to address CEI's continuing personnel performance concerns at Perry.

Previous input from internal and external reviews had indicated a need to examine the effectiveness of management efforts to achieve satisfactory improvements in personnel performance. This input also prompted Perry management to request a self-assessment by an Ad Hoc Subcommittee of the PNPP Nuclear Safety Review Committee which was initiated in January 1993. The Subcommittee was charged by CEI management to determine the root causes of personnel performance concerns, and to recommend appropriate corrective actions.

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Based on its own assessment and those of the NSRC and INPO, Perry management has initiated immediate and long term actions necessary to achieve and monitor sustained improvement in personnel performance. Perry management recognized that personnel performance is, among other things, a function of management effectiveness. Accordingly, the improvement plan provides specific actions to: set direction and leadership for the improvement effort; establish new standards for performance and accountability; and sponsor performance improvements throughout the Perry organization.

CEI is confident that the implementation of these actions will contribute to achieving our goal of becoming a top performer in the nuclear industry. We appreciate the NRC staff's effort in performing a thorough and objective evaluation of Perry's operation during this assessment period, and we welcome your constructive comments toward our performance goal.

Sincerely,

Robert A. Stratman

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cc: NRC Project Manager
NRC Resident Inspector Office
NRC Region III