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June 8, 1990
PY-CEI/NRR-1183 L

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

Perry Nuclear Power Plant
Docket No. 50-440
Implementation of Administrative
Controls and Training Related to
Use of T.S. 3.0.4 (TAC No. 66284)

Gentlemen:

The requested information on the implementation date for administrative controls over the use of Technical Specification 3.0.4 and on operator training related to Amendment 30 of the PNPP Operating License is provided herein.

It is our intent to fully implement the Amendment 30 changes by June 18, 1990. Five items were discussed in our previous letter on this subject (PY-CEI/NRR-1122L) dated March 12, 1990. Each of these items is discussed individually below.

The first item committed that a management directive would be provided to make it clear that good practice dictates that plant startup should be initiated only when all required equipment is operable, and that plant startup with inoperable equipment must be the exception rather than the rule. This management directive will be provided from the Vice President, Nuclear-Perry to PNPP's Plant Manager, Operations Section Manager and Operations Superintendent on Monday, June 18, 1990. For your information, since the time of the previous March 12, 1990 letter, it was determined that providing this same type of guidance directly to the operators in a written form would be desirable, therefore a Technical Specification Position Statement will be issued to express this same philosophy.

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Operating Companies:
Cleveland Electric Illuminating
Toledo Edison

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The second item noted that all licensed operators, including Unit Supervisors and Shift Supervisors, would receive training to the Generic Letter 87-09 Tech Spec 3.0.4 related changes and their intent. This training will be completed on June 15, 1990. This training includes those licensed operator personnel from the Training Section who are responsible for training future operator classes. At this time, four of the six operator shifts have completed the training during this cycle of normally scheduled requalification classes. Although the commitment was to provide training to the 3.0.4 portion of the Amendment, training is also being provided on the 4.0.3 and 4.0.4 changes. In case a need should arise to implement the 4.0.3 and 4.0.4 portions of this Amendment prior to the 3.0.4 portion, due to an inadvertently missed surveillance or a forced shutdown, a training package on the use of 4.0.3 and 4.0.4 has been provided to the Control Room in case one of the two remaining operating shifts are on shift and need to be trained. If the 4.0.3 and 4.0.4 portion needs to be implemented prior to the 3.0.4 portion, a subsequent letter will be provided to the NRC to identify that this course of action was taken. This is based on our understanding that the implementation hold applies to the 3.0.4 portion of Amendment 30.

The third item, which involved revision of a plant procedure to include a policy statement to the effect that LCO's will be tracked with the purpose of clearing them prior to plant startup, whether or not startup is prohibited by T.S. 3.0.4., has been approved by management, and will be made effective on June 18, 1990.

The fourth item involved revision of plant procedures to add a review of open LCO's prior to plant startup, with the intent of clearing the LCOs, where practicable. In keeping with the Staff's desire for implementation of administrative controls and for ongoing awareness of the philosophy with regard to plant startup with inoperable equipment, procedural changes have been approved, and will be made effective on June 18 in accordance with the following commitment which has been revised to reflect the actual wording utilized in the IOI's: "4. Procedural changes will be made to require a review to be performed as a part of the plant startup checklists which will record the Technical Specification number, Applicability, identification of equipment/item not meeting an LCO requirement, and corrective actions taken/planned for any LCO's for which the provisions of Technical Specification 3.0.4 will be relied upon to permit a plant startup. These revisions will be made to the startup checklists within the instructions which control plant startups, IOI-001, "Cold Startup", and IOI-002, "Hot Startup". These startup checklists provide for review and approval by the Unit Supervisor and Shift Supervisor. This review will be performed with the purpose of clearing open LCO's prior to startup, where practicable."

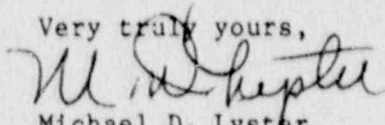
The above commitment has also removed reference to IOI-009 "Refueling," since it has no relationship to mode changes involving startup of the plant. This commitment will implement the Staff conclusion in Amendment 30 that "the licensees have in place adequate administrative controls and procedures which will ensure that it will be the exception rather than the rule that startup of the plant with important safety features inoperable will occur."

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The fifth item noted that future audits of PNPP Tech Spec activities conducted by the Nuclear Assurance Department will include an assessment of conformance to T.S. 3.0.4 policy as expressed in the revised bases for T.S. 3.0.4 and in the administrative controls and training described in items 1 through 4 above. A change to the Audit/Surveillance Planning Guide for this activity will be made effective prior to the next conduct of operations Audit, which will provide for this review to be completed in future audits.

As noted above, it is our intent to have Amendment 30 fully implemented by June 18, 1990. If there are any questions, please feel free to call.

Very truly yours,



Michael D. Lyster

Vice President, Nuclear - Perry

MDL/njc

cc: T. Colburn
P. Hiland
USNRC Region III