



**CENTERIOR
ENERGY**

PERRY NUCLEAR POWER PLANT

10 CENTER ROAD
PERRY, OHIO 44081
(216) 259-3737

Mail Address:
PO BOX 97
PERRY, OHIO 44081

Robert A. Stratman
VICE PRESIDENT - NUCLEAR

December 17, 1993
PY-CEI/NRR-1737 L

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

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

Gentlemen:

This letter responds to the Notice of Violation identified in Inspection Report 50-440/93020 dated November 18, 1993. The report documented the results of a routine unannounced safety inspection by Region III inspectors conducted at the Perry Nuclear Power Plant (PNPP) Unit 1 from September 13 through October 29, 1993.

Response to Notice of Violation 50-440/93020-01 is provided in Attachment 1. In addition, Inspection Report 50-440/93020 describes two events regarding inadequate control of vehicles outside of the PNPP Transmission Yard, which severed overhead electrical lines on July 22, and September 2, 1993. Attachment 2 provides information with respect to these recent events.

If you have questions or require additional information, please contact Henry Hegrat - Regulatory Affairs, at (216) 259-3737 extension 5606.

Sincerely,

220047

RAS:DW

Attachment

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

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

9312280144 931217
PDR ADOCK 05000440
Q PDR

DEO

RESPONSE TO NOTICE OF VIOLATION

I. RESTATEMENT OF VIOLATION

Title 10 of the Code of Federal Regulations, Part 50, Appendix B, Criterion V, Instruction, Procedures, and Drawings, requires, in part, that activities affecting quality be prescribed by procedures and accomplished in accordance with these procedures.

Perry plant administrative procedure (PAP)-0102, "Interface with the System Operations Center," revision 0, section 6.5.5, provides controls over activities in the transmission yard, including requiring notification of the Systems Operations Center upon entering the transmission yard, maintaining of the access gates closed and locked except for access, and limiting access to the transmission yard to vehicles required for transmission yard maintenance or testing. Transmission yard activities are activities affecting quality.

Contrary to the above, on October 27, 1993, the transmission yard was accessed without notification of the System Operations Center, the access gate was open and unlocked during a period when access was not in progress, and a truck with a backhoe trailer not intended for transmission yard maintenance was parked in the transmission yard.

This is a Severity Level IV Violation (Supplement 1).

II. REASON FOR THE VIOLATION

On March 19, 1991, PNPP received NRC Information Notice No. 90-25, Supplement 1. This notice specifically discusses the adequacy of switchyard administrative controls. In response to this notice, PNPP personnel re-evaluated plant administrative procedures with respect to administrative controls for the transmission yard. Existing PNPP procedural guidance provided:

1. Systems Operations Center (SOC) control of entry to the PNPP Transmission Yard, with a note that access gates should be locked at all times except for the time necessary for personnel and equipment entry and exit.
2. Control Room Unit Supervisor control of entry to the PNPP Transformer Yard.
3. Assignment of a Safety Watch for all non-company personnel who enter the PNPP Transformer Yard.

In addition to the PNPP procedural guidance, the following existing requirements were also re-evaluated at that time:

1. Signs were posted at transmission yard access gates stating: (a) Notify System Dispatcher upon entry X-XXX-XXXX; (b) Vehicle access to structure area is strictly controlled; and (c) Gates must be kept locked at all times.
2. Procedural guidance utilized by non-nuclear personnel performing maintenance in the transmission yards stated "Any employee authorized to carry a key which permits entry to a substation shall close and lock all external gates and doors after entering and notifying the Dispatcher of their presence. They shall also notify the Dispatcher when leaving the station and be sure all windows, doors and gate are closed and locked."

Based on the program requirements above, PNPP personnel determined that no further corrective actions were necessary to ensure transmission yard control.

On March 3, 1992, PNPP received NRC Information Notice No. 92-13, and re-evaluated plant administrative procedural guidance with respect to the adequacy of switchyard controls. PNPP personnel again determined that no further program enhancements were necessary.

On October 27, 1993, the transmission yard was accessed without notification of the System Operations Center, the gate was open and unlocked during a period when access was not in progress, and a truck with a backhoe trailer not intended for transmission yard maintenance was parked in the transmission yard.

The root cause of Cleveland Electric Illuminating Company's (CEI) personnel failure to follow administrative procedures is failure to provide adequate training to non-nuclear employees concerning special access controls for PNPP's Transmission Yard.

Non-nuclear personnel, in practice, only contact SOC prior to entry into transmission yards (nuclear and non-nuclear) if maintenance is to be performed on switchyard equipment. The non-nuclear personnel were not aware that all entries into PNPP's Transmission Yard required SOC notification and that access gates must be immediately closed and locked.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Immediate Corrective Actions

PNPP Operations personnel placed additional locks on all transmission yard access gates. These locks prevented further access without concurrence from Operations personnel.

PNPP Operations management contacted CEI non-nuclear management to inform them of the events which had occurred on October 27, 1993.

On October 28, 1993, CEI management met with non-nuclear personnel reporting to the transmission yard to review entry and egress requirements. In addition, CEI management changed the transmission yard locks on October 29, 1993, and issued a limited quantity of serialized keys to select individuals that require entry. Moreover, Perry specific training was provided to all key holders on transmission yard entry and egress requirements.

Further Corrective Actions

On November 9, 1993, all transmission yard gate locks were removed and replaced with a single set of locks under control of PNPP Operations personnel. Signs were also placed on all access gates directing individuals to contact the Control Room Unit Supervisor for permission to enter the transmission yard.

A memorandum was issued to CEI non-nuclear management establishing the PNPP Control Room Unit Supervisor as the access authority for the PNPP Transmission Yard.

Plant Administrative Procedure (PAP-0102) "INTERFACE WITH THE SYSTEM OPERATIONS CENTER" was modified to strengthen requirements with respect to transmission yard administrative controls.

PNPP Operations Shift Supervisors were trained to this event with emphasis on: (1) maintaining stringent control of transmission yard entry and egress; and (2) needed improvement in evaluating and responding to concerns, when identified by nuclear personnel or NRC Inspectors.

All licensed operators will review this event in the next Current Events Training Cycle.

IV. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Additional monitoring of the above corrective actions will be performed and enhancements will be made as necessary to preclude a similar event from occurring in the future.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on October 27, 1993, when PNPP Operations personnel placed additional locks on all transmission yard access gates. These locks prevented further access without concurrence from Operations personnel.

INADEQUATE VEHICLE CONTROL RESULTS IN SEVERED OVERHEAD ELECTRICAL LINES

As described in the cover of Inspection Report 50-440/93020, inadequate control of vehicles outside of the PNPP Transmission Yard severed overhead electrical lines on July 22, and September 2, 1993, respectively. Although these events occurred outside the transmission yard, PNPP management considered these events to be serious in nature. Accordingly, root cause investigations were performed for both of these events, and the following corrective actions have been taken or initiated and will be tracked through PNPP's Condition Report Process.

1. These events were discussed in detail with all contractor maintenance personnel at weekly safety meetings.
2. A program will be developed to identify all overhead lines that traverse roadways at PNPP, and will be placed on maps to be located in all crane cabs.
3. All overhead lines traversing PNPP roadways will be made more visible through the use of balls, lines on roads, or signs.
4. Administrative guidance will be utilized to limit transport of loads with cranes, front end loaders, backhoes, or fork-lifts. Whenever possible, trucks or trailers will be utilized to transport loads.
5. Procedures will be revised to incorporate safe practices when operating mobile cranes, towmotors, or trucks.
6. Interim guidance for equipment and vehicle operation was issued by the Plant General Manager on September 9, 1993.

PNPP believes implementation of these corrective actions will preclude similar events from occurring in the future.