

ACD / OCB

FEB 18 1994

Docket No. 50-440

Centerior Service Company  
ATTN: Mr. R. A. Stratman  
Vice President  
Nuclear - Perry  
P.O. Box 97, S 270  
Perry, OH 44081

Dear Mr. Stratman:

This refers to the inspection conducted by Messrs. A. Vogel, J. Gavula, and D. Kosloff of this office, on December 19, 1993, through January 29, 1994. The inspection included a review of activities authorized for your Perry Nuclear Power Plant, Unit 1, facility. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The first violation, involving failure to follow a procedure during maintenance, is of concern because of your recent history of similar violations (Inspection Reports 50-440/93016 and 50-440/93020). This violation indicates continued weaknesses in your oversight of maintenance activities and inadequate sensitivity of your personnel to the importance of procedural compliance. The second violation, involving failures to correctly sample reactor water for conductivity measurements, indicates continued weaknesses in your oversight of sampling programs required for Technical Specification compliance and continued problems with personnel errors during surveillance activities.

We are also concerned that your freeze protection program has not been effectively implemented, and as a result a number of challenges to plant systems have occurred. In addition, deficiencies identified by the NRC, if not corrected, also had the potential for additional challenges to the plant. Additional management attention and oversight appears warranted in this area, as does a review of your current cold weather preparations.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this

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Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

You are also requested to address in your response to the Notice any specific actions you have taken or plan to take to address the weaknesses discussed above.

During this inspection, certain other of your activities appeared to be in violation of NRC requirements. However, as described in the enclosed inspection report, you identified this violation. Therefore, the violation will not be subject to enforcement action because your efforts in identifying and correcting the violation met the criteria specified in Section VII.B of the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), 10 CFR Part 2, Appendix C. The non-cited violation involved personnel errors, which are a continuing NRC concern at Perry.

An additional personnel error during a maintenance activity is being evaluated as an unresolved item. This item is of concern because it may have caused a loss of safety function of the Emergency Closed Cooling System and because of the length of time it took for you to evaluate the condition caused by the personnel error.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosures will be placed in the NRC Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Original Signed by R. D. Lanksbury

*for*  
L. R. Greger, Chief  
Reactor Projects Branch 3

Enclosures:

- 1. Notice of Violation
- 2. Inspection Report  
No. 50-440/93023(DRP)

See Attached Distribution

|            |   |            |            |
|------------|---|------------|------------|
| R111       | R111  | R111       | R111       |
| <i>RDf</i> | <i>RDf</i><br><i>Completion</i><br><i>Release</i> | <i>ACC</i> | <i>RDf</i> |
| Lanksbury  | Jacobson  | Olteanu    | Greger     |
| 2/18/94    | Para 9.a<br>2/18/94                               | 2/18/94    | 2/18/94    |

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cc w/enclosures:

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