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Vice President - Nuclear

September 24, 1990  
PY-CEI/NRR-1221 L

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

Perry Nuclear Power Plant  
Docket No. 50-440  
Response to Generic Letter 90-03  
and Supplement 1, Vendor Interface  
for Safety-Related Components

Gentlemen:

The subject Generic Letter (GL) and its supplement restates the Staff position regarding licensee programs to maintain interfaces with safety-related component vendors, a position originally taken in GL 83-28 Item 2.1 and Part 2 of Item 2.2. GL 90-03 clarifies requirements for the NSSS interface, and provides the staff position that an adequate vendor interface program should include a program of periodic contact with the vendors of other "key, safety-related components".

The attachment to this letter addresses each element of the Staff's recommended vendor interface program vs. existing Cleveland Electric Illuminating Company (CEI) practice and concludes that (a) the NSSS vendor interface meets GL 90-03, (b) the balance-of-plant vendor interfaces meet GL 90-03 regarding technical information and updates on spare parts and, most importantly, in assuring that sufficient attention is paid to equipment maintenance, replacement and repair by emphasizing on-site technical support and responsibility for the accuracy, interpretation and use of associated technical information. With the establishment of an additional periodic contact program, PNPP vendor interfaces will be fully consistent with the recommendations of GL 90-03.

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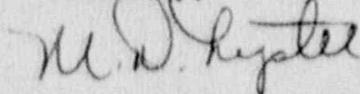
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Regarding onsite responsibility for continued valid use of vendor information, the PNPP Quality Assurance Program is structured and implemented around the principle of CEI responsibility for safety-related component quality throughout its life cycle, which certainly includes the maintenance necessary to assure safety function. At two points, GL 90-03 addresses the subject of controlling work performed by vendors or contractors, in accordance with 10CFR50 Appendix B, and continuing a program to assure sufficient attention is paid to maintenance/replacement/repair to compensate for lack of vendor backup, should that occur. It is understood that the use of vendor information does not diminish our responsibility; the PNPP procedures, training and QA program are in place to reinforce that understanding. We meet the letter and intent of GL 90-03 in this regard.

Please feel free to call if you have further questions.

Sincerely,



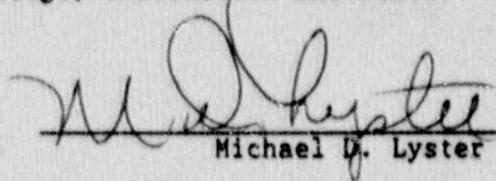
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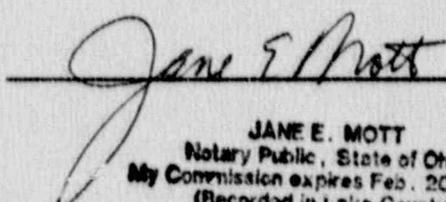
Attachments

cc: NRR Project Manager  
NRC Resident Inspector  
USNRC Region III

Michael D. Lyster who, being duly sworn, deposed and said that (1) he is Vice President - Nuclear - Perry of the Centerior Service Company, (2) he is duly authorized to execute and file this report on behalf of The Cleveland Electric Illuminating Company and Toledo Edison Company, and as the duly authorized agent for Duquesne Light Company, Ohio Edison Company, and Pennsylvania Power Company, and (3) the statements set forth therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Michael D. Lyster

Sworn to and subscribed before me, this 24<sup>th</sup> day of September,  
1990.

  
\_\_\_\_\_  
JANE E. MOTT  
Notary Public, State of Ohio  
My Commission expires Feb. 20, 1995  
(Recorded in Lake County)

**CEI/NSSS Vendor Interfaces  
for Safety-Related Component Information**

(a) NSSS Vendor

Generic Letter 90-03 (GL 90-03) states that the NRC staff has concluded that an adequate vendor interface program should include:

A program with the NSSS vendor as described in the VETIP, which covers all the safety-related components within the NSSS scope of supply. This program should include provisions for assuring receipt by the licensee/applicant of all technical information provided by the NSSS vendor....

The CEI/NSSS vendor interface was described in our original response to Generic Letter 83-28 (PY-CEI/NRR-0100L, 4/6/84) and subsequently found acceptable by NRC letter Colburn to Kaplan dated 12/21/88. These letters specifically discuss the ongoing interface program with the NSSS vendor. Although this discussion was provided in response to Item 2.1 addressing "Reactor Trip Function Components" it is applicable to all the safety related components in the NSSS scope of supply. The ongoing vendor interfaces with our NSSS supplier continue today, and provide a strong feedback mechanism for identified concerns. This program also includes provisions for assuring receipt of technical information provided by the NSSS vendor. In addition to the ongoing programs and documentation cited in previous letters, CEI supports the BWR Owners Group. The BWROG meets five times a year for several days of discussions on such topics as equipment performance, maintenance, and other matters germane to GL 90-03. Based on these programs, we conclude that the NSSS Vendor interface remains acceptably controlled.

(b) Balance-of-Plant Vendors

GL 90-03 also recommends a program to periodically contact the vendors of "key, safety-related components" to maintain technical information applicable to this equipment. Determination of key components is to be based on operating experience, probabilistic risk assessment (PRA) results, and current availability of information.

For safety-related equipment, PNPP administrative procedures are in place to update and control the use of vendor manuals. Vendor manual use is further restricted for ordering parts, where it is stipulated that the vendor be contacted prior to using vendor manual parts lists. Change controls include review of other procedures and instructions which reference the vendor manual.

In addition to configuration controls, technical interpretation of vendor information requires a review by qualified individuals (e.g. Design Engineer) to ensure proper application. This meets the intent of the GL 90-03 recommendation that the licensee continue to assure sufficient attention to equipment maintenance and repair irrespective of vendor accessibility. Vendor information is normally used as reference-only for procedure development; and procedures, instructions, and work orders are subjected to quality assurance provisions for independent review and approval.

To determine key components in the context of GL 90-03, PNPP will initially determine safety-related plant systems and components which either prevent, or would be necessary to recover from, station blackout. Station Blackout is a beyond-design-basis event, but one which is being examined by an ongoing Individual Plant Examination (IPE) for the Perry Plant. When the PNPP IPE is concluded (estimate July 1992), systems will be redefined as needed to include other significant contributors to core melt. We expect those examples cited in GL 90-03 and Supplement 1 to be representative of our initial key components list.

Key component vendors will then be contacted periodically (at least triennially). Responsible system engineers will determine applicable vendor questions for this evaluation based on vendor manual review guidelines available in existing procedures. In all cases, the questions will provide assurance that PNPP has received vendor-issued information pertinent to its safety-related equipment. Periodic vendor contact for this purpose will start in June 1991.

As long as active vendor interfacing continues with a sufficient frequency, scope, and content, the associated component(s) will not be included in the above "periodic contact" process. Cases in point include our diesel generators and motor-operated valves. The DeLaval Owners Group, which developed the extensive reconditioning and inspection program for our Division 1 and 2 diesel engines, continues to meet several times a year for substantial technical information exchange (at and between meetings) with the vendor. A second diesel owners' group is now being organized which will address our Division 3 (High Pressure Core Spray dedicated) diesel in a similar manner, and CEI will be joining that group.

Safety-related MOV's are being extensively evaluated and tested, with frequent vendor contact, to address Bulletin 89-10. Along with related BWROG, EPRI, and other industry group involvement, this meets the intent of GL 90-03 without additional MOV vendor contact until Bulletin 89-10 work is completed (estimate summer 1994).

NJC/CODED/3782