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ENERGY**

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U.S. Nuclear Regulatory Commission
Document Control Room
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Perry Nuclear Power Plant
Docket No. 50-440
Response to Notice of Violation

Gentlemen:

This letter provides supplemental information to the Perry Nuclear Power Plant response to the Notice of Violation contained within Inspection Report 50-440/93023 dated February 18, 1994 (reference letter PY-CEI/NRR 1774L dated March 21, 1994). The report documented the results of the routine unannounced safety inspection performed by NRC resident inspectors December 19, 1993 through January 29, 1994.

The supplemental information addresses weaknesses in the oversight of sampling programs required for Technical Specification compliance, continued problems with personnel errors during surveillance activities, the oversight of maintenance activities, and inadequate sensitivity of personnel to the importance of procedural compliance. The supplemental information is provided by Attachment 1.

If you have questions or require additional information, please contact Henry Hegrat, Manager - Regulatory Affairs, at (216) 280-5606.

Very truly yours,

RAS:DHL:sc

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

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Operating Companies
Cleveland Electric Illuminating
Toledo Edison

JED 11

Response to
Cited Weaknesses

Two weaknesses were identified:

- 1) Violation 93023-01 indicates continued weakness in the oversight of sampling programs required for Technical Specification compliance and continued problems with personnel errors during surveillance activities.
- 2) Violation 93023-02 indicates continued weakness in the oversight of maintenance activities and inadequate sensitivity of personnel to the importance of procedural compliance.

Regarding the first weakness, corrective actions have been identified to address individual events concerning sampling programs.

Additionally, the Radiation Protection Section has initiated actions which include the following; A sample tracking form and log book are being implemented to control and track samples. A job and task analysis and a review of industry practices are being conducted on the sample control program, the results will be utilized to revise the program. An INPO assist visit to review chemistry practices was completed in February 1994 during which a review of sample control was included. Perry is evaluating recommendations made in this report. Finally, procedures have been established to provide personnel standards of performance and instructions for periodic review of work practices and performance trending.

Perry Nuclear Power Plant has initiated the following actions to address the second weakness:

All Maintenance personnel participated in meetings in which management expectations for procedural compliance and enforcement of policies and practices were communicated by the Maintenance Section Manager. Contractors were formally notified of these same expectations.

Maintenance management continues to stress the importance of procedural compliance through monitoring of field activities and regularly scheduled meetings. The maintenance staff has been augmented with additional procedure writers to provide timely correction to procedural problems. A review of the procedure program is being performed to develop an improved format and to evaluate the creation of new and revising of existing procedures to provide clearer and more usable information to the users. These reviews will also evaluate the work order review process to ensure that adequate reviews are being performed. In several instances where expectations have not been met stop work actions have been initiated until corrective actions have been identified and completed.

The Maintenance Section has initiated a Maintenance Performance Monitoring Program. The program is designed to use Performance Monitoring and Peer Evaluation teams to periodically observe and evaluate work order processing and field execution from job planning through paperwork closure. These teams will be made from a multi-discipline task force of supervisory and craft personnel, familiar with all aspects of the work being performed. This evaluation process will ensure that activities will be performed in a manner consistent with management's expectations. Evaluations will be pre-scheduled and performed on a regular basis. Corrective actions will be documented and tracked to completion.