



**CENTERIOR
ENERGY**

PERRY NUCLEAR POWER PLANT

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

Mail Address:
P.O. BOX 97
PERRY, OHIO 44081

Michael D. Lyster
VICE PRESIDENT - NUCLEAR

March 27, 1991
PY-CE.,/NRR-1335 L

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

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

Gentlemen:

This letter acknowledges receipt of the Notice of Violation contained within Inspection Report 50-440/90-022 dated January 24, 1991. The report identified areas examined by Region III Inspectors from November 17, 1990, through January 7, 1991.

Our response to Notice of Violation 50-440/90022-01, is provided in Attachment 1.

As previously discussed with the Perry Resident Inspector's Office, the Perry Organization received Inspection Report 50-440/90-022 on February 28, 1991. Accordingly, transmittal of this letter on March 27, 1991, is considered to satisfy the requirement for response to the NOV within 30 days of issuance.

If you have any questions, please feel free to call.

Sincerely,

Michael D. Lyster

MDL:DWG

Attachment

cc: NRR Project Manager
Sr. Resident Inspector
USNRC Region III

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

9104020345 910327
PDR ADOCK 05000440
Q PDR

IE01

11

11084

50-440/90022-01
Restatement of Violation

Technical Specification 6.8.1.a required that written procedures be established, implemented, and maintained as recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Section 4.e of Appendix A of Regulatory Guide 1.33 recommended procedures for the operation of Shutdown Cooling. System Operating Instruction (SOI)-E12, Revision 6, "Residual Heat Removal Systems," provided written instructions for the operation of the Shutdown Cooling mode of the Residual Heat Removal System. Specifically, paragraph 5.7 of SOI-E12 required reactor coolant temperature be maintained between 75 to 85 degrees F while the plant was in Operational Condition 5 (refueling).

Contrary to the above, on November 19, 1990, plant operators allowed the reactor coolant temperature to increase to 121 degrees F, which was outside of the specified 75 to 85 degrees F range. At the time of this event, the plant was in Operational Condition 5 (refueling).

This is a Severity Level IV violation (Supplement I).
(50-440/90022-01)

Corrective Actions That Have Been Taken and Results Achieved

On November 19, 1990, the plant was in Operational Condition 5 with Reactor Pressure Vessel (RPV) assembly in progress. Residual Heat Removal (RHR) "B" loop of shutdown cooling was in operation to maintain a temperature band of 75 to 85 F. After shift turnover, the oncoming second shift operating crew determined and verified that reactor coolant temperature had increased to 121 F. The Shift and Unit Supervisors were notified, and the event was evaluated for cause. It was determined that operators on the previous shift had secured flow through the RHR Heat Exchanger to control cooldown rate, and had been monitoring coolant temperature on an indicator which was isolated from system flow. The Unit Supervisor directed the operating crew to re-establish shutdown cooling flow through the heat exchanger, and the reactor coolant temperature was returned to about 80 degrees F within 30 minutes. Later that day, this event was documented in accordance with the Condition Report Process.

Corrective Actions to Avoid Further Violations

Investigation into the event resulted in the following corrective actions, in order to prevent recurrence of a similar event in the future.

1. Operations management discussed the circumstances associated with this event with all the operators involved. Specific emphasis was placed on the need to ensure that valid indications are utilized to control plant operating parameters.
2. Operations shift supervisors stressed to their respective crews the need to ensure that control of the plant has the highest operating priority.
3. The applicable operating instructions are being evaluated for revision to include additional guidance on avoiding invalid temperature indications during cold shutdown decay heat removal evolutions.
4. The Operations Section manager will provide further training and discussion of this issue during Licensed Operator Requalification training. This corrective action is expected to be completed by May 1, 1991.

Although inadequate communication was not a direct cause of this event, communications between operations personnel throughout the event could have been improved. Therefore, a communications policy memorandum was issued from the Operations Manager to all Operations Section Personnel, which in part stressed:

- a. Operational communications, defined as communications involved with operation of plant equipment, implementation of a procedure or instruction, transfer of operational data, exchange of urgent information during plant emergencies, and transfer of information important to plant safety, shall be formally transmitted using recognized Good Practices for clear, specific, and acknowledged messages. It was also stated that repeat backs shall be utilized when communicating.
- b. It is the responsibility of all involved individuals to transmit information clearly, and ensure that the communication has been received and understood. "Proper communication is a team skill."

Attachment 1
PY-CEI/NRR-1335 L

Date When Full Compliance Will be Achieved

Full compliance was achieved on November 19, 1990, when the on-coming operating crew re-established shutdown cooling flow through the Residual Heat Removal (RHR) "B" heat exchanger, and returned the reactor coolant temperature to within the required temperature band of 75 - 85 F.