

SCO / DCB

October 28, 1994

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 inspections conducted by D. Kosloff and others of this office and the Office of Nuclear Reactor Regulation, on August 19 through October 7, 1994, of activities authorized for your Perry Nuclear Power Plant, Unit 1, facility. At the conclusion of the inspection, the findings were discussed with you and members of your staff.

Areas examined during the inspections are identified in the report. Within these areas, the inspections consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress. The purpose of the inspections was to determine whether activities authorized by your license were conducted safely and in accordance with NRC requirements.

You should note that this inspection report represents an integrated product of a number of diverse inspections that were conducted during the inspection period. The summary contained in the report provides an overview of our assessment of your performance in the four functional areas (Operations, Maintenance, Engineering, and Plant Support) in which inspections were performed.

Overall, we found that the conduct of activities during this period was adequate. We are encouraged by your continuing efforts to identify problems. However, considerable effort appears necessary to reduce your large backlogs of corrective actions, maintenance tasks, and engineering items.

Operator errors were a concern during this inspection period. Your failure to maintain control of reactivity while restoring automatic recirculation flow control exemplified previously noted communications weaknesses as well as poor command and control. The initial failure to identify an inoperable emergency diesel generator during a maintenance repetitive task was an example of a lack of attention to detail and questioning attitude by your personnel, similar to an example identified in the previous inspection period.

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 violation involved a personnel error during restoration from a plant transient which caused a premature power increase.

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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 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.

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 one of these violations and the other was of minor safety significance, although it was identified by the NRC. Therefore, the violations will not be subject to enforcement action because your efforts in identifying and correcting the violations 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. Two non-cited violations described in paragraphs 1.3 and 1.5 involved the failure to maintain a locked valve locked and failure to document entry into a Technical Specification Limiting Condition for Operation. A third violation, involving an example of an inadequate review of work which removed a component from service, is considered to be an example of a similar violation recently cited in inspection report (IR) 50-440/94011 and will not be subject of additional enforcement action. As we discussed with your staff, it is expected that the corrective actions proposed in your response to IR 50-440/94011 will also address the causes of the current example.

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

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

Sincerely,

L. Robert Greger, Chief  
Reactor Projects Branch 3

Docket No. 50-440

Enclosures:

- 1. Notice of Violation
- 2. Inspection Report  
No. 50-440/94013

See Attached Distribution

DOCUMENT NAME: g:perr.ir\per94013.drp

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DATE	10/28/94	10/28/94	10/28/94	10/28			

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Sincerely, *Original signed by*  
*L. Robert Greger*

L. Robert Greger, Chief  
 Reactor Projects Branch 3

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OFFICE	RIII	RIII	RIII	RIII	RIII	E
NAME	Tongue	Pederson	Wright	Olteanu	Greger <i>(signature)</i>	
DATE					10/28	

cc w/encl: R. W. Schrauder, Director, Nuclear  
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