



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
789 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

FEB 28 1992

Docket No. 50-440
Docket No. 50-441

Centerior Service Company
ATTN: Mr. Michael D. Lyster
Vice President
Nuclear - Perry
c/o The Cleveland Electric Illuminating
Company
10 Center Road
Perry, OH 44081

Dear Mr. Lyster:

This refers to the NRC's Systematic Assessment of Licensee Performance (SALP) 11 Report for the Perry Nuclear Power Plant, and our meeting of January 21, 1992, which discussed in detail the contents of the report and your written comments dated February 7, 1992, relative to the report.

Regarding the issues raised in your written comments dated February 7, 1992:

- The main steam line isolation valve (MSIV) leakage assessment/determination was described in inspection report 50-440/90020.
- The inspection report summary of inspection report 50-440/91017 specifically identified attention to detail in performing modifications as a weakness.
- I agree that the lack of centralized control of modifications was not prominently highlighted as an issue in the inspection reports for the SALP 11 assessment period. However, it was identified in the previous SALP assessment and, based on the inspectors' observations during the SALP 11 assessment period, remained a weakness.
- I would like to thank you for the additional information regarding the excessive use of Priority 1 Work Orders. Your use of work control processes will continue to be evaluated during the SALP 12 assessment period.

Based on the formal exchange of information between our respective staffs and our thorough review and evaluation of your letter of response, we have reached the conclusion that no changes to the Initial SALP Report are necessary. As such, the

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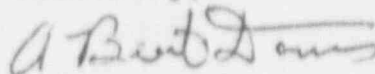
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Initial SALP Report dated December 19, 1991, is considered to be the Final SALP Report.

In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter with the referenced enclosures, will be placed in the NRC's Public Document Room.

No reply to this letter is required; however, should you have questions regarding the Final SALP Report, please let us know and we will be pleased to discuss them with you.

Sincerely,



A. Bert Davis
Regional Administrator

Enclosures;

1. Final SALP 11 Report
No. 50-440/91001
(Meeting Summary)
2. Licensee Response Letter
dated February 7, '92

See Attached Distribution

FEB 28 1992

Distribution

cc w/enclosures:

F. R. Stead, Director, Nuclear
Support Department
R. A. Stratman, General Manager,
Perry Nuclear Power Plant
K. P. Donovan, Manager,
Licensing and Compliance Section
S. F. Kensicki, Director, Perry
Nuclear Engineering Dept.
H. Ray Caldwell, General
Superintendent Nuclear Operations
DCD/DCB (RIDS)
OC/LFDCB
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Utilities Commission
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Public Utilities Commission
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FINAL SALP REPORT

U.S. NUCLEAR REGULATORY COMMISSION
REGION III

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

Inspection Report No. 50-440/91001

Cleveland Electric Illuminating Company

Perry Nuclear Power Plant

August 1, 1990, through October 31, 1991

Perry Nuclear Power Plant

A. Summary of Meeting with Cleveland Electric Illuminating Company on January 21, 1991.

The findings and conclusions of the SALP Board are documented in Report No. 50-440/91001 and were discussed with the licensee on January 21, 1992, at the Perry Training and Education Center in Perry, Ohio.

While the meeting was primarily a discussion between the licensee and NRC, it was open to members of the public as observers.

The following licensee and NRC personnel were in attendance, as well as the noted observers.

Centerior Service Company

Richard A. Miller, Chairman
Robert J. Farling, President
Murray R. Edelman, Executive Vice President, Power Generation
Michael D. Lyster, Vice President - Perry
Mary E. O'Reilly, Senior Attorney
Mark R. Burns, Senior Nuclear Engineer
Eileen M. Mikkelsen, Rates Analyst

Cleveland Electric Illuminating Company

Robert A. Stratman, General Manager Perry
Frank R. Stead, Director, Nuclear Support
Steven F. Kensicki, Director, Nuclear Engineering
Emanuel Riley, Director, Nuclear Assurance
Benard R. Beyer, Director, Administrative Services
Russell J. Tadych, Manager Quality Control
William E. Coleman, Manager, Quality Assurance
John P. Eppich, Manager, Mechanical Design
Vincent J. Concel, Manager, Systems Engineering
David P. Igyarto, Manager, Training
Martin Cohen, Manager, Plant Maintenance
William J. Wright, Manager, Instrument and Control
Pasquale Volza, manager, Radiation Protection
Kevin P. Donovan, Manager, Licensing and Compliance
Melvin W. Gymrek, Manager, Operations
Robert L. Vondrasek, Manager, Emergency Planning
Thomas E. Mahon, Manager, Site Protection
L. Robert Haworth, Manager, Plant Services
Edward M. Root, Manager, Performance Engineering

Enclosure 1

Thomas G. Swansiger, Manager, Materials Management
Kenneth R. Pech, Manager, Outage Planning
Henry Hegrat, Supervisor, Compliance
R. R. Bowers, Health Physicist
J. J. Traverso, Senior Project Engineer - Radiation and
Environmental
E. C. William, Senior Project Engineer
D. L. Reyes, Independent Safety Engineering
James E. Emley, Engineer

Toledo Edison Company

K. A. Filar, Nuclear Licensing Compliance Engineer -
Davis-Besse

Nuclear Regulatory Commission

A. Bert Davis, Regional Administrator, RIII
Edward G. Greenman, Director, Division of Reactor Projects,
RIII
John N. Hannon, Director, Project Directorate III-3, Nuclear
Reactor Regulation (NRR)
Roger D. Lanksbury, Chief, Reactor Projects Section 3B, RIII
James R. Hall, Senior Project Manager, NRR
Patrick L. Hiland, Senior Resident Inspector, Perry
Anton E. Vogel, Resident Inspector, Perry
Meena K. Khanna, Intern, RIII
Jan Strasma, Senior Public Affairs Officer, RIII

Other

J. Bento, Ashtabula County Commissioner
T. Breckenridge, Cleveland Plain Dealer Reporter
J. R. Williams, State Liaison To NRC, Ohio Emergency
Management Agency (EMA)
Carol A. O'Claire, Assistant Supervisor, Emergency Planning,
Ohio EMA
Troy Reeves, Radiological Analyst, Ohio EMA
Zack A. Clayton, Radiation Response Coordinator, Ohio EMA
Edward I. Somppi, Radiation/Chemistry Coordinator, Ashtabula
County EMA
John Vitellas, Energy Specialist, Public Utilities
Commission of Ohio

B. Comments Received from Licensee

Cleveland Electric Illuminating Company response to the
Perry Initial SALP 11 Report dated February 11, 1992, had no
comments requiring revision to the specific content of the
report. Because there is no revision, the Initial SALP
Report is considered the Final SALP Report.



**CENTERIOR
ENERGY**

PERRY NUCLEAR POWER PLANT

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Michael D. Lyster

VICE PRESIDENT - NUCLEAR

February 7, 1992
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U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Perry Nuclear Power Plant
Docket No. 50-440
Perry Plant SALP 11 Res onse

Gentlemen:

This letter provides the Cleveland Electric Illuminating Company's response to the Systematic Assessment of Licensee Performance (SALP) report for the Perry Nuclear Power Plant, Unit 1, covering the period of August 1, 1990, through October 31, 1991. This period included Refuel Outage 2 and a major part of the third operating cycle. Our response supplements comments on the SALP 11 report expressed during a meeting with the NRC on January 21, 1992 and is concentrated on the issues identified in your letter dated December 19, 1991.

CEI was encouraged to again receive the highest rating in the functional areas of Security and Emergency Preparedness, as we have for the previous five and six reporting periods respectively. Additionally, the ratings explicitly acknowledged improvement through the recognition of an improving trend in Engineering/ Technical Support, and the reversal of a declining trend (from the previous SALP Report) in the Maintenance/Surveillance areas. In the areas of Plant Operations, Radiological Controls, and Safety Assessment/Quality Verification, we appreciate the NRC's acknowledgment of many improvements in our performance, even though the nature of the grading process precluded any improvement in the numerical rating.

With respect to the Emergency Operating Procedures (EOP) Team Inspection, CEI recognizes the far reaching impact of the problems in development and implementation of the revised EOPs. Corrective actions have been taken to correct the violations; others are currently in progress to prevent recurrence of a similar problem in the future. Both the results of the followup simulator evaluation and actual use of the Plant Emergency Instructions (PEIs) demonstrate our operators' ability to successfully implement the PEIs. CEI also acknowledges the continued concern with personnel errors during the SALP period. Management will continue to emphasize Total Quality at Perry in order

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to continue the downward trend in personnel errors evidenced over the last six months of the SALP period.

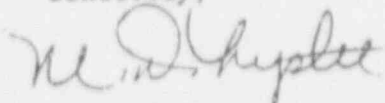
Our review of the SALP Report identified the following issues which warranted a specific response.

- Previous NRC documentation indicated that the issues related to MSIV leakage assessment/determination, inattention to design details, and modification control not being centralized were relatively minor in nature and were not prominently highlighted as major issues in previous correspondence. Although we do not dispute the validity of the statements made, CEI was somewhat surprised to see these issues documented as weaknesses in the SALP.
- With respect to the excessive use of Priority 1 Work Orders identified in the SALP, it should be clarified that these observations originated in the Maintenance Team Inspection (MTI) performed in September, 1990. CEI recognized the validity of these observations and further restrictions were placed on the use of Priority 1/2 work activities. CEI would also like to note that there were no Priority 1 Work Orders written since this was identified as a weakness by the MTI in September 1990.

Finally, we would like to express our recognition of improvements in the NRC assessment and evaluation efforts. It is evident that industry standards continue to demand a high level of performance as the industry matures. Accordingly, CEI will continue to strive for excellence through the development of our Five Year Plan and Total Quality efforts. It is our goal to become a top performer in the nuclear industry. We welcome your constructive comments toward achievement of that goal.

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

Sincerely,



Michael D. Lyster

MDL:HLH:DWC

Attachments

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