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ENERGY**

**PERRY NUCLEAR POWER PLANT**

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VICE PRESIDENT - NUCLEAR

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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 Response

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 area 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.

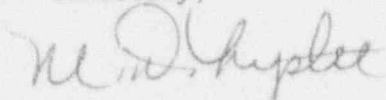
Our review of the SALP Report identified the following issues which warranted a specific response.

- 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