



PERRY NUCLEAR POWER PLANT
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SENIOR VICE PRESIDENT
NUCLEAR

December 14, 1995
PY-CEI/NRR-1998L

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Perry Nuclear Power Plant
Docket No. 50-440
10CFR50.54(a)(3) Review of Changes in Administrative Controls for
Procedures and Instructions - Supplemental Information

Gentlemen:

Review of two changes to the administrative process for procedures and instructions at the Perry Nuclear Power Plant (PNPP) was requested by a letter dated August 31, 1995 (PY-CEI/NRR-1968L), pursuant to the provisions of 10CFR50.54(a)(3).

Mr. Fred Maura, of the NRC Staff, requested additional information regarding the changes under review during a telephone conversation with Mr. K. R. Pech. Additional information to address this request will be inserted in the Updated Safety Analysis Report (USAR), Table 1.8-2, as reflected in the attachment to this letter.

The August 31, 1995 letter identified that the current Technical Specification requirement for periodic reviews would be met through the creation of a four year cycle on procedures that had not otherwise been reviewed during the previous four years. As a result of the additional information provided herein, the periodic reviews required by Technical Specifications will instead be conducted in accordance with the periodicity requirements of plant administrative procedures, as described in the attachment to this letter.

If you have questions or require additional information, please contact Mr. James D. Kloosterman, Manager - Regulatory Affairs at (216) 280-5833.

Very truly yours,

for
Donald C. Shelton

TAH:vah

Attachment

cc: NRC Project Manager NRC Resident Inspector
NRC Region III

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

9512180311 951214
PDR ADOCK 05000440
P PDR

180054

ADD 1

Attachment
PY-CEI/NRR-1998L

Add the following paragraphs to the section being inserted into USAR Table 1.8-2, Regulatory Guide 1.33, "Degree of Conformance" column (page 2 of 16 of Attachment 2 to PY-CEI/NRR-1968L):

Routine procedures and instructions will be maintained through the review and feedback process described above.

Plant Emergency Instructions, Off-Normal Instructions, and instructions which have a performance frequency of two years or longer will be reviewed at least every two years and revised as appropriate. The requirement to conduct a review could be fulfilled by a complete revision of an instruction.

A biennial assessment of randomly selected plant procedures and instructions will be performed to determine effectiveness of these program maintenance/change mechanisms with keeping procedures and instructions current.

This exception to biennial periodic reviews does not apply to Security Plan and Emergency Plan implementing instructions which will continue to be subject to annual periodic reviews in accordance with the requirements of the Code of Federal Regulations.