

PERRY NUCLEAR POWER PLANT

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VICE PRESIDENT - NUCLEAR

April 10, 1992
PY-CEI/NRR-1478 L

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

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

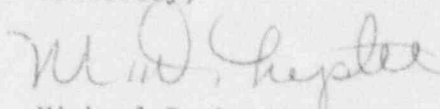
Gentlemen:

This letter acknowledges receipt of the Notice of Violation contained within Inspection Report 50-440/92002 dated March 13, 1992. The report identified areas examined by Region III Inspectors from January 13, 1992, through February 27, 1992.

Our responses to Examples A and B of Notice of Violation 50-440/92002-01 are provided in Attachments 1 and 2, respectively.

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

Sincerely,



Michael D. Lyster

MDL:DWC

Attachments

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

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PDR ADDCK 05000440
G PDR

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

Handwritten note: JED 1/1

50-440/92002-01A

Restatement of Violation

Technical Specification 6.8.1 requires in part, that written instructions shall be implemented covering the procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Perry plant's System Operating Instruction (SOI)-P51/52, "Service and Instrument Air Systems," Revision 6, and Generic Electric Instruction (GEI)-0039, "Full Battery Equalizing Charge For Lead-Calcium Batteries," Revision 3, were procedures established in accordance with Appendix A of Regulatory Guide 1.33.

Contrary to the above,

On January 25, 1992, while shifting instrument air Afterfilters, plant operators failed to implement written instruction SOI-P51/52. A valve lineup error was made resulting in the loss of instrument air to the outboard main steam isolation valves (50-440/92002-01A(DRP)).

Reason for the violation

This violation was attributed to personnel error, failure to follow procedure, on the part of the Plant Auxiliary Operator performing a shift of the instrument air afterfilters. Plant Administrative Procedure (PAP-0201), "Conduct of Operations", provides, in part, the following instructions on how to conduct plant operations from shift to shift:

"Due to the sensitive nature of work in the nuclear utility industry, performance is measured by both quality and quantity. The design of the Perry Plant prevents immediate severe plant/equipment damage, without requiring immediate operator action. There is always that extra minute to double-check the print or reread the nameplate before taking action. Take the time to be sure; know what to do, how to do it, and how the plant and equipment should respond. It is not a sign of ignorance to look up the "fuzzy" areas or to always use the procedures, even for mundane evolutions; it is being safe."

"Plant equipment shall be operated in accordance with written, approved instructions. If the individual actually performing the activity cannot, or believes he should not, follow the instruction governing that activity as written, he shall place the system/component into a stable and safe condition and inform the responsible supervisor."

"Non-complex or routine evolutions (e.g., breaker racking and Auxiliary Boiler operation) do not require the presence of the instruction during the operation of the equipment. However, the operator should review the instruction (paying particular attention to the PRECAUTIONS AND LIMITATIONS section when provided) prior to equipment operation to ensure compliance. When performing reactivity control evolutions and when performing complex or abnormal system/equipment operation per System Operating Instructions, Integrated Operations, or Off-Normal Instructions after immediate action, the operator shall review the instruction prior to performing the evolution and shall have the instruction present during the conduct of the evolution."

The auxiliary operator involved with this evolution has been trained to PAP-0201, and, in fact, had reviewed the appropriate operating instruction prior to attempting to shift the instrument air afterfilters. However, the auxiliary operator believed that this evolution was non-complex in nature and therefore did not take the procedure with him to the job site. Accordingly, while attempting to perform the evolution by memory, he failed to implement System Operating Instruction (SOI-P51/52), "Service and Instrument Air" which resulted in the temporary loss of instrument air to the outboard Main Steam Isolation Valves.

Corrective steps that have been taken and the results achieved

The auxiliary operator immediately restored the instrument air lineup upon hearing the Control Room Unit Supervisor announce over the plant page that the plant was losing instrument air, and that all plant personnel should walkdown their area to look for air leaks. Additionally, operations personnel subsequently verified that the instrument air system was lined up in accordance with approved operating instructions.

Corrective steps that will be taken to avoid further violations

The following corrective actions have been taken to prevent recurrence of a similar event in the future.

1. The plant operator was counseled on the importance of having the appropriate procedure in hand when performing plant operations.
2. A Daily Instruction was issued by the Superintendent of Plant Operations to emphasize the requirement and importance of having the appropriate procedure in hand while performing plant operations.
3. An updated copy of SOI-P51/52 has been located in the vicinity of this particular job site to facilitate future use during instrument air evolutions.
4. The guidance and requirements of PAP-0201 were reviewed and found to be adequate.
5. Performance of this specific evolution is being considered for addition to the On-The-Job Training (OJT) for plant operators.

Dates when full compliance will be achieved

Full compliance was achieved on January 25, 1992, when the auxiliary operator restored the instrument air lineup upon learning that the plant was losing instrument air. Operations personnel subsequently verified that the instrument air system was lined up in accordance with approved operating instructions.

50-440/92002-01B

Restatement of Violation

Technical Specification 6.8.1 requires in part, that written instructions shall be implemented covering the procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Perry plant's System Operating Instruction (SOI)-P51/52, "Service and Instrument Air Systems," Revision 6, and Generic Electric Instruction (GEI)-0039, "Full Battery Equalizing Charge For Lead-Calcium Batteries," Revision 3, were procedures established in accordance with Appendix A of Regulatory Guide 1.33.

Contrary to the above,

On January 31, 1992, while performing an equalizing charge on Class 1E, Unit 1, Division 1 station battery, plant operators failed to implement written instruction GEI-0039. The incorrect station battery was placed on equalize charge, resulting in a D.C. bus voltage transient, loss of supplied inverters, and isolation of the offgas system (54-440/92002-01B(DRP)).

Reason for the violation

This violation was attributed to personnel error, inattention to detail and failure to follow procedure, on the part of the Plant Auxiliary Operator. The operator was told to go to the Unit 1 Division 1 Battery (Control Complex Building), and place the Float/Equalize switch to the Equalize position. The operator proceeded, without reviewing or taking the appropriate maintenance instruction (GEI-0039), "Full Battery Equalizing Charge for Lead-Calcium Batteries", to the Unit 1 Balance of Plant Battery Room (Turbine Power Complex Building). After a final communication with the control room operator, the auxiliary operator placed the Unit 1 Balance of Plant Battery on Equalize instead of the Unit 1 Division 1 Battery, as instructed. This resulted in the temporary loss of power to some Process Radiation monitors and in an Offgas System isolation. Had the operator utilized the procedure he may have realized that he was about to perform the evolution on the wrong component. As delineated in Attachment 1 to this Reply to Notice of Violation, PAP-0201 provides clear direction to operators to review and take appropriate instructions with them to the job site. It should be noted that GEI-0039 was at the Unit 1 Division 1 Battery Room job site.

Corrective steps that have been taken and the results achieved

Following a brief investigation and determination of the cause of the loss of the Process Radiation monitors and Offgas System isolation, the auxiliary operator placed the Unit 1 Balance of Plant Battery Float/Equalize Switch back to the Float position.

Corrective steps that will be taken to avoid further violations

The following corrective actions have and will be taken to prevent recurrence of a similar event in the future.

1. The auxiliary operator was counseled on the importance of paying strict attention to detail and on the use of procedures. He also received appropriate disciplinary action.
2. This event will be reviewed by operators in Operator Requalification Training to reinforce the need for paying strict attention to detail.

Dates when full compliance will be achieved

Full compliance was achieved on January 31, 1992, when the auxiliary operator placed the Unit 1 Balance of Plant Battery Float/Equalize Switch back to the Float position.