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Al Kaplan

VICE PRESIDENT
NUCLEAR GROUP

July 21, 1988
PY-CEI/NRR-0877 L

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

Perry Nuclear Power Plant
Docket No. 50-440
Additional Information for
Technical Specification
Change Request on
Administrative Controls

Gentlemen:

The Cleveland Electric Illuminating Company (CEI) previously requested, by letter dated April 8, 1988 (PY-CEI/NRR-0823 L), a Technical Specification change which included a revision to the Plant Operations Review Committee (PORC) membership. The Federal Register Notice for this amendment request was issued on May 31, 1988. Since that time CEI has concluded that two changes to the submittal should be made.

First the Federal Register Notice for this amendment request noted that "the changes related to the size and composition of the PORC would result in a net decrease in experience and expertise of that body...". This comment was directed primarily at the proposed removal of the Manager, Perry Plant Technical Department and the Manager, Perry Plant Operations Department from the membership. (These individuals now hold the titles of Director, Perry Plant Technical Department and General Manager, Perry Plant Operations Department). The Federal Register Notice also stated that the licensees (CEI's) evaluation of this change concluded that "the function of PORC remains largely the same; to provide advice to the Manager, Perry Plant Operations Department and others on matters relating to safety. By creating a PORC independent from these persons, the licensees argue that the PORC's ability to carry out its function should be enhanced."

CEI believes that the principle of a PORC independent from the General Manager, Perry Plant Operations Department remains valid. Additional consideration of the management structure of our organization and of the PORC membership however, has led to the conclusion that the Director, Perry Plant Technical Department (PPTD) should remain on the Plant Operations Review Committee, as the Chairman. In association with this, it has been decided that the position

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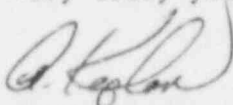
of Technical Superintendent, Perry Plant Technical Department will be eliminated. These decisions require a modification of our previously submitted Technical Specification Change Request. The newly proposed PORC membership composition is included as Attachment 1. This page is intended to supersede the Technical Specification page 6-8 that was submitted in Attachment 2 of the April 8, 1988 letter. This change to the previous proposal involves only the addition of the Director, PPTD to the PORC Composition listing, and the deletion of the Technical Superintendent, PPTD. Therefore, this change does not affect the previously proposed quorum requirement for a Chairman and at least four members including alternates.

The second change involves a title change due to a recent plant reorganization. This reorganization created a new Perry Plant Department, the Nuclear Support Department. The Site Protection Section now reports to this Department Director. Therefore, Technical Specification 6.5.3.1.f requires modification to indicate that Security Plan changes, and Security Plan implementing instruction changes will be approved by the Director, Nuclear Support Department (NSD) vice the Director, Perry Plant Technical Department. The other previously requested modifications to this section of the Technical Specifications are still considered appropriate. The newly proposed Technical Specification 6.5.3.1.f is included as Attachment 2. This page is intended to supersede the Technical Specification page 6-15 that was submitted in Attachment 2 of the April 8, 1988 letter.

These two changes do not affect any of the other administrative changes proposed in our April 8, 1988 submittal. The Safety Analysis, Significant Hazards Analysis, and Environmental Impact of the original request remain valid and are still applicable.

If there are any questions, please feel free to call.

Very truly yours,



Al Kaplan
Vice President
Nuclear Group

AK:cab

cc: T. Colburn
K. Connaughton
USNRC Region III