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United States Nuclear Regulatory Commission
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Perry Nuclear Power Plant
Docket No. 50-440
10CFR50.54(a)(3) Elimination of the
Radiological Assessor

Ladies and Gentlemen:

The Perry Nuclear Power Plant (PNPP) is planning an organizational change in the Radiation Protection Program, which includes the elimination of the Radiological Assessor position. The change is being pursued as part of PNPP's overall efforts to streamline the organization and align work groups to improve communications and workflow.

Review of this change is being requested pursuant to the provisions of 10CFR50.54(a)(3). The details and bases for the change are contained in Attachments 1 and 2.

If you have questions or require additional information, please contact Mr. Henry L. Hegrat, Manager - Regulatory Affairs, at (440) 280-5606.

Very truly yours,

For Lew W. Myers

Attachments

cc: NRC Project Manager
NRC Resident Inspector
NRC Region III

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Summary of the Proposed Change

The function of the Radiological Assessor is to provide oversight of the Perry Nuclear Power Plant (PNPP) Radiation Protection Program (RPP). This oversight function is redundant to the oversight functions already provided by on-site and off-site work groups (e.g. the Quality Assurance Section and the Company Nuclear Review Board). The proposed change will eliminate the redundancy in the RPP oversight function through the elimination of the Radiological Assessor position.

This change modifies the PNPP Updated Safety Analysis Report (USAR) Section 17.2.1.3.2.1 which describes responsibilities of the Radiological Assessor. This change is considered an improvement in the oversight processes at PNPP since it eliminates a duplicative and redundant function, and should improve the consistency in the RPP oversight function. In the evaluation of this change, it was determined that Nuclear Regulatory Commission (NRC) review pursuant to 10CFR50.54(a) was required prior to implementing the change. The effect of the change is minimal. The successful performance and management of the quality assurance functions contained in 10CFR50, Appendix B have been assured.

Details of the Proposed Change

USAR Section 17.2.1.3.2.1 (USAR page 17.2-5b) will be revised to delete the following sentences, "The Radiological Assessor reports to the General Manager, PNPPD. The function of the Radiological Assessor is to provide health physics overview and evaluations of design and operational programs."

Attachment 2 contains a copy of the proposed USAR change.

Basis for the Proposed Change

As a result of the Three Mile Island (TMI) event, the NRC performed a number of assessments on various plant activities and functions. Specifically, the NRC performed an industry RPP assessment. The results of this assessment are detailed in NUREG-0855, "Health Physics Appraisal Program." Though this assessment did not provide any definitive guidelines, it did raise the industry's awareness of weaknesses in site RPPs. During the time of this assessment, PNPP was under construction. PNPP had hired a number of personnel to develop and implement the PNPP RPP. Due to the concerns raised by the NRC in NUREG-0855 and the relative inexperience of the site radiation protection personnel, PNPP management created the Corporate Health Physicist (CHP) position in 1984. The primary duty and responsibility of the CHP was to provide oversight of the RPP. The CHP was renamed the Radiological Assessor (RA) in 1996.

Since the creation of the CHP (currently known as the RA) position in 1984, a number of changes have occurred with respect to the oversight of the PNPP RPP. The following paragraphs describe these changes.

Since the receipt of the PNPP Operating License in 1986, the site quality assurance organization has gained experience in the performance of audits and surveillances. Furthermore, the quality assurance organization has the ability to augment audit/surveillance teams with experienced, technical expert peers which improves the technical expertise of the teams. These factors contributed to an improvement in the quality of audits and surveillances.

The ALARA Subcommittee (reference PNPP USAR Section 12.1.3) provides assurance that the concepts of ALARA are factored in the performance of various site activities. This subcommittee is comprised of various disciplines including operations, engineering, and radiation protection.

Examples of subcommittee functions are: review radiological controls inspection reports and evaluate corrective action plans, provide surveillance of design procedures and activities to ensure proper ALARA considerations, and review significant ALARA issues and perform special reviews or investigations as necessary.

Additionally, the off-site review board, the Company Nuclear Review Board (CNRB), is required to have a member qualified in the area of radiation protection (USAR Section17.2.1.3.5). Examples of CNRB functions are the independent review and audit of various plant activities, which includes radiological safety activities.

In 1991, Federal Regulations were modified to incorporate 10CFR20.1101(c) which requires licensees to periodically (at least annually) review RPP content and implementation. This RPP review is implemented through the site self-assessment program. Administrative guidance has been promulgated to ensure resource availability to perform self-assessments and to assure self-assessments are performed in a consistent and thorough manner. The PNPP Corrective Action Program is used to evaluate, track, and correct any potentially adverse issue(s) identified during the performance of any self-assessment.

Additionally, trend analyses are performed upon the results of the RPP self-assessments as well as upon RPP significant condition reports. Condition reports are generated to evaluate and correct any negative trends that may have been identified.

These processes provide a measure of assurance that the PNPP RPP will be effectively implemented and controlled. Furthermore, the PNPP self-assessment program combined with the PNPP Corrective Action Program ensures satisfactory compliance with 10CFR20.1101(c).

Since there are no regulatory requirements to have a RA position, and the aforementioned activities are redundant to the RA position, PNPP desires to optimize the Radiation Protection Program through the elimination of the RA position.

~~The Radiological Assessor reports to the General Manager, PNPRD. The function of the Radiological Assessor is to provide health physics overview and evaluations of design and operational programs.~~

The Perry Nuclear Engineering Department consists of two sections: Design Engineering, and Information Technology Sections. The responsibilities of each element are discussed in Section 13.1.2.2.2.