



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 - CLEVELAND, OHIO 44101 - TELEPHONE (216) 622-9800 - ILLUMINATING BLDG. - 55 PUBLIC SQUARE

Serving The Best Location in the Nation

MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

April 23, 1986

PY-CEI/OIE-0195 L

Mr. R. F. Warnick, Chief
Reactor Projects Branch 1,
Division of Reactor Projects, Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

RE: Perry Nuclear Power Plant
Docket Nos. 50-440
50-440/86006 Noncompliance Response

Dear Mr. Warnick:

This letter is to acknowledge receipt of Inspection Report 50-440/86006 attached to your letter dated March 24, 1986. This report identifies areas examined by Messrs. J. A. Grobe, K. A. Connaughton, J. W. McCormick-Barger, D. E. Hills, and J. M. Ulie during their inspection conducted December 30, 1985 through March 3, 1986 at the Perry Nuclear Power Plant Unit 1.

Attached to this letter is our response to the Notice of Violation dated March 24, 1986. This response is in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations.

Our response has been submitted to you within thirty days of the date of the Notice of Violation as you requested. If there are additional questions, please do not hesitate to call.

Very truly yours,

Murray R. Edelman
Vice President
Nuclear Group

MRE:cp

Attachment

8605270209 860423
PDR ADCK 05000440
Q PDR

APR 28 1986

IEO1
11

Mr. R. F. Warnick

-2-

April 23, 1986
PY-CEI/OIE-0195 L

cc: Mr. J. A. Grobe
USNRC Site, SBB50

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

Response to Noncompliance
50-440/86006-01

A. Statement of Violation

10CFR50, Appendix B, Criterion V, as implemented by CEI's PNPP Quality Assurance Plan, Section 5, require that activities affecting quality shall be prescribed by and accomplished in accordance with instructions and procedures.

Contrary to the above, the following violations of these requirements were observed during the inspection period:

- a. CEI System Operating Instructions SOI-E21, Revision 3, "Low Pressure Core Spray System (Unit 1);" SOI-G33, Revision 2, "Reactor Water Cleanup System (Unit 1);" and SOI-P47, Revision 2, "Control Complex Chilled Water System," which direct activities that affect quality, were found to contain technical errors and omissions which rendered the instructions inadequate. Examples were identified where components were improperly identified, activities were directed to be performed by the wrong section of the instruction, operators were directed to shutdown equipment that should have been started up, system restoration steps were omitted, required block valves were not opened when establishing system flow, and verification checklist did not specify the proper component configuration.
- b. Work Order No. 86-2829 for filling and venting the suppression pool level instruments was not prepared, controlled, or accomplished in accordance with instructions and administrative procedures in that uncontrolled non-asbuilt drawings were used in the performance of safety-related work, work was performed out of the required sequence, incorrect instructions (identified during the performance of the work order) were not properly corrected prior to continuing work, and the work order did not, as required, include the purpose of the work order in the planners remark section.
- c. Independent restoration verifications associated with Work Order No. 86-2829 were not accomplished in accordance with administrative procedure in that physical valve position verification was not performed.

B. Response

1. Corrective Steps Which Have Been Taken and Results Achieved

- (a) Deficiencies pertaining to System Operating Instructions (SOI's) noted in the report have been corrected. Our schedule to review and correct technical or administrative deficiencies in all SOI's was described in our letter dated March 4, 1986 (PY-CEI/OIE-0179L). To ensure completion of these actions, the General Supervisor, Operations has added a Senior Staff Engineer to his organization. The Senior Staff Engineer is a licensed Senior Reactor Operator and is primarily responsible for ensuring adequate content of Operations instructions and procedures.

- (b) Instrumentation and Control (I&C) Supervision immediately reviewed Work Order No. 86-2829 and its associated temporary work instruction. Supervision also discussed the fill and vent process used for the suppression pool level instrumentation with the technicians who performed the work and determined the actual fill and vent process had been performed adequately and would not have adversely affected the safety function of the instrumentation.
- (c) Instrumentation and Control Section Supervision immediately directed technicians to verify the correct positions of the valves manipulated during Work Order No. 86-2829. All valves were found to be correctly positioned.

2. Corrective Steps to Prevent Recurrence

- (a) As stated in our letter dated March 4, 1986, the SOI reverification has been undertaken to improve the SOI's in response to the concerns identified by your staff. Other actions taken to improve the technical and administrative content of SOI's included the extra level of review provided by the Senior Staff Engineer; increased emphasis on Instruction writer accountability and awareness related to instruction content; and stressing to the Instruction writers and reviewers the need for more thorough research and review during procedure development.
- (b) In addition to the actions identified in our letter dated March 14, 1986 (PY-CEI/OIE-0181L) concerning instrument valve lineup verification conducted in accordance with Special Project Plan 1401, PAP-0607, "Perry Plant Department Drawing Control", Attachment 2, has been changed to include as-built drawings (D 814-727-900 Series). Unit personnel have been indoctrinated concerning the change to PAP-0607 and the need to perform work activities with as-built drawings.

The Work Planner who developed Work Order No. 86-2829 was counseled concerning failure to state the purpose of the Work Order.

The technicians involved with the fill and vent process were individually counseled for failing to follow the fill and vent instructions and failing to follow work instruction change procedures. All I&C Units have been indoctrinated on the incident and have attended site wide compliance training endorsed by Plant Management.

- (c) It became apparent to I&C Supervision that general requirements for independent verification described in PAP-0205 did not readily apply to all I&C applications. IAP-0503 was immediately changed to incorporate specific requirements for valve manipulations. I&C Section personnel were given training for that change. Additionally, I&C Supervision is reviewing all I&C applications requiring independent verification and will make further changes to IAP-0503. Training will be conducted for all procedure changes.

3. Date of Full Compliance

- (a) The SOI's scheduled for reverification prior to fuel load, as described in our March 4, 1986 letter were completed by that milestone. Other SOI's, required to be reverified by a later milestone date are being completed on schedule. Actions pertaining to indoctrination and reorganization have been completed.
- (b) PAP-0607 was changed to include references to appropriate as-built drawings on April 15, 1986. Personnel indoctrination and counseling were completed as of March 14, 1986. Special Project Plan 1401 will be completed as described in our March 14, 1986 letter.
- (c) IAP-0503 was changed to incorporate independent verification for valves on March 3, 1986. Training for that change was completed as of March 18, 1986. IAP-0503 will be changed to incorporate independent verification requirements for all I&C applications by May 9, 1986. Training will be completed on or before that date.

Response To Noncompliance
50-440/86006-02

A. Statement of Violation

10CFR50, Appendix B, Criterion II, as fulfilled by the applicant's Quality Assurance Program described in Final Safety Analysis Report, Section 17.2.2.2.c, requires that environmental conditions affecting quality shall be suitably controlled. These controls, implemented through Plant Administrative Procedure (PAP)-0204, "Housekeeping/Cleanliness Control Program", shall meet the requirements of Regulatory Guide 1.39, Revision 2, and ANSI N45.2.3-1973 as committed by the applicant in Final Safety Analysis Report, Table 1.8-2.

Contrary to the above, the following violations of these requirements were observed during the inspection period:

- a. PAP-0204 did not designate proper housekeeping zone classification for the fuel handling area, the fuel storage area, and for the suppression pool, and responsibility for establishing the proper housekeeping zones was not assigned as required in ANSI N45.2.3-1973, Section 3.2.
- b. Tools, supplies, and equipment were not being controlled in the facility by tagging and/or removal in accordance with PAP-0204, Section 6.5, and ANSI N45.2.3-1973, Section 3.4.

B. Response

1. Corrective Steps Which Have Been Taken and Results Achieved

- (a) CEI Management directed that PAP-0204 be revised to clearly identify responsibilities for establishing housekeeping zones and provide for consideration of the operating condition of the plant in establishing zones. Interim controls were established for the Reactor Building #1 Containment and Drywell Areas. These controls included retrieving suppression pool debris, adding protective covering over the suppression pool, performing general cleanup and controlling containment access and material accountability. Personnel access hatches were also secured. Both areas were declared Cleanliness Level 3 by February 10, 1986. The conditions were evaluated and the debris retrieved from the suppression pool did not adversely affect the pool's safety function.
- (b) The Plant Manager directed the Plant Helper Supervisor to conduct a plant wide inspection of orange tag adequacy per PAP-0204. Equipment was either removed or the tag updated/corrected/issued so that the equipment could remain at the work site. No adverse effect on in-place plant equipment was identified as a result of expired or nonexistent orange tags. The inspection was completed March 3, 1986.

2. Corrective Steps to Prevent Recurrence

- (a) PAF-0204 now requires the General Supervisor, Operations to assign housekeeping zones throughout the plant. Operations personnel were trained to PAF-0204, Revision 2, as of April 7, 1986.
- (b) Management reviewed the established controls for orange tags as defined in PAF-0204. Although no program procedural changes were required, the need for improved compliance with program requirements was apparent. Construction, Maintenance and Plant Helper personnel were trained to PAF-0204, Revision 2 and attended site wide procedure compliance training endorsed by Plant Management. All training was completed as of April 17, 1986.

3. Date of Full Compliance

Full compliance has been achieved.