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Perry Nuclear Power Plant  
Docket No. 50-440  
Updated Final Safety Analysis Report  
Initiatives and NRC Revised Enforcement Policy

Ladies and Gentlemen:

The revised NUREG-1600, Enforcement Policy, effective October 18, 1996, established the NRC policy for addressing issues related to compliance with Safety Analysis Reports (SAR). NUREG-1600 further discussed the need for licensee programs to ensure the completeness and accuracy of the information contained in the SAR. This submittal establishes the Perry Nuclear Power Plant's (PNPP) voluntary commitment for the performance of Updated Safety Analysis Report (USAR) validation initiatives.

Sample USAR Validation Program

Due to NRC concerns regarding the fidelity of licensee USARs, PNPP performed a validation of several USAR sections to determine if similar issues existed with the PNPP USAR. The Sample Validation Program identified deficiencies which ranged from typographical errors to the inability to locate supporting documentation. The deficiencies were categorized with respect to their importance and to the probable causes of the deficiencies. The PNPP Corrective Action Program is being used to evaluate and correct the causes of the deficiencies, and to identify actions necessary to prevent recurrence.

Licensing Basis Review

PNPP completed an assessment of licensing basis control effectiveness for selected systems as described in the Nuclear Energy Institute (NEI) Industry Initiative dated October 2, 1996. This assessment was performed using the guidelines contained in NEI 96-05, "Guidelines for Assessing Programs for Maintaining the Licensing Basis." This assessment also identified

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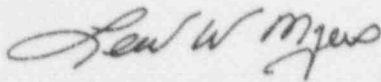
deficiencies associated with the PNPP USAR. These deficiencies were categorized similar to those identified in the Sample Validation Program. These deficiencies have been incorporated into the PNPP Corrective Action Program evaluation described above.

USAR Validation Program

Based upon the data obtained in the aforementioned reviews and from other recent evaluations of on-site activities, PNPP intends to implement a validation of the PNPP USAR. The goal of this program is to provide assurance that the PNPP USAR accurately reflects the current design, operation, analyses, and licensing basis of the facility. Application of this program to USAR sections with a significant relevance to plant safety is expected to be completed by October 1998. During this period, the results of the corrective action program evaluations described above, including lessons learned during the performance of the validation, will be factored into the PNPP licensing bases control programs, as appropriate.

If you have questions or require additional information, please contact Mr. Henry L. Hegrat, Manager - Regulatory Affairs, at (216) 280-5606.

Very truly yours,



JEE:sc

cc: NRC Project Manager  
NRC Resident Inspector  
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