



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

September 1, 2020

Mr. Frank Payne
Site Vice President
Energy Harbor Nuclear Corp.
Perry Nuclear Power Plant
Reg Affairs–A210
10 Center Road, P.O. Box 97
Perry, OH 44081–0097

SUBJECT: UPDATED INSPECTION PLAN FOR PERRY NUCLEAR POWER PLANT
(REPORT 05000440/2020005)

Dear Mr. Payne:

The enclosed inspection plan lists the inspections scheduled through June 30, 2022, for Perry Nuclear Power Plant. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. Routine inspections performed by resident inspectors are not included in the inspection plan. You should be aware that the agency is pursuing potential changes to the Reactor Oversight Process (ROP), including changes to engineering inspections (SECY-18-0113, “Recommendations for Modifying the Reactor Oversight Process Engineering Inspections”), and other changes to the baseline inspection program described in SECY-19-0067, “Recommendations for Enhancing the Reactor Oversight Process.” Should these changes to the ROP be implemented, the engineering and other region-based inspections are subject to change in scope, as well as schedule. The inspections listed during the last twelve months of the inspection plan are tentative and may be revised. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes.

In response to the COVID-19 public health emergency (PHE), the NRC is adjusting inspection plans and schedules in order to safeguard the health and safety of both NRC and licensee staff while still effectively implementing the ROP. Each planned inspection is being carefully reviewed in order to determine if any portions of the inspection can be performed remotely, determine how best to perform on-site portions to minimize personnel health risks, and adjust inspection schedules if needed. This is done in accordance with guidance contained in the May 28, 2020 memo, “Inspection Guidance During Transition From COVID-19 Mandatory Telework” (ML20141L766). For inspections requiring extensive coordination with offsite organizations, such as evaluated emergency preparedness exercises, NRC guidance and frequently asked questions for security and emergency preparedness can be found here: <https://www.nrc.gov/about-nrc/covid-19/security-ep/>. Similarly, the NRC has developed guidance if force-on-force inspections cannot be completed as scheduled due to an emergency, such as the COVID-19 PHE. These changes help ensure the health and safety of both NRC and licensee staff while maintaining the NRC’s important safety and security mission during the COVID-19 PHE. The attached inspection plan is accurate on the date of issuance but remains subject to change based on approval of potential exemption requests or other changes needed

due to changing conditions in the COVID-19 PHE. NRC staff will contact your appropriate regulatory affairs staff in order to coordinate inspection planning and scheduling.

The NRC will also be performing baseline inspections of licensee cyber security programs. The specific schedule and procedure to be used for these baseline inspections are being developed by the NRC staff. Anticipated baseline inspection dates are presented in the attached; however, the staff will confirm the schedule for these inspections with each utility separately.

Additionally, during this period the NRC will perform inspections per Temporary Instruction (TI) 2515/194, "Inspection of the Licensee's Implementation of Industry Initiative Associated with the Open Phase Condition Design Vulnerability in Electrical Power Systems (NRC Bulletin 2012-01)."

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact me at 630-829-9587 with any questions you have regarding this letter.

Sincerely,

/RA/

April Nguyen, Acting Chief
Branch 2
Division of Reactor Project

Docket No. 50-440
License No. NPF-58

Enclosure(s):
Inspection Plan

cc: Distribution via LISTSERV®

Letter to Frank Payne from April Nguyen dated September 1, 2020.

SUBJECT: UPDATED INSPECTION PLAN FOR PERRY NUCLEAR POWER PLANT
(REPORT 05000440/2020005)

DISTRIBUTION:

Jessie Quichocho
Elise Burket
RidsNrrPMPerry Resource
RidsNrrDorLpl3
RidsNrrDrolrib Resource
John Giessner
Kenneth O'Brien
Jamnes Cameron
Allan Barker
DRPIII
DRSIII
ROPAssessment.Resource@nrc.gov

ADAMS Accession Number: ML20244A285

Publicly Available Non-Publicly Available Sensitive Non-Sensitive

OFFICE	RIII	RIII			
NAME	RRuiz:wc via email	ANguyen via email			
DATE	8/28/2020	8/28/2020			

OFFICIAL RECORD COPY

IP 22 Inspection Activity Plan Report

Perry

07/01/2020 - 06/30/2022

Unit	Start	End	Activity	CAC	Title	Staff Count
Radiation Protection Baseline Inspection						1
1	07/20/2020	07/31/2020	IP 71124.03	000727	In-Plant Airborne Radioactivity Control and Mitigation	
1	07/20/2020	07/31/2020	IP 71124.06	000730	Radioactive Gaseous and Liquid Effluent Treatment	
Security Baseline Inspection						2
1	08/03/2020	08/07/2020	IP 71130.04	000736	Equipment Performance, Testing, and Maintenance	
1, 2	10/01/2020	12/31/2020	IP 71130.09	001656	Security Plan Changes	
1	10/05/2020	10/09/2020	IP 71130.02	000734	Access Control	
1	10/05/2020	10/09/2020	IP 71130.05	000737	Protective Strategy Evaluation	
ISFSI Cask Loading Inspection 3Q2020						2
1	08/17/2020	08/21/2020	IP 60855.1	000590	Operation of an Independent Spent Fuel Storage Installation at Operating Plants	
Emergency Preparedness Exercise Inspection / Performance Indicator Verification						4
1	09/14/2020	09/18/2020	IP 71114.01	000716	Exercise Evaluation	
1	09/14/2020	09/18/2020	IP 71151	001397	Performance Indicator Verification	
Radiation Protection Baseline Inspection						1
1	10/26/2020	10/30/2020	IP 71124.05	000729	Radiation Monitoring Instrumentation	
Perry Biennial Licensed Operator Requalification Program Inspection						2
1	12/06/2020	12/12/2020	IP 71111.11B	000704	Licensed Operator Requalification Program and Licensed Operator Performance	
Perry February 2021 Initial License Exam						4
1	01/03/2021	01/09/2021	OV	000956	VALIDATION OF INITIAL LICENSE EXAMINATION (OV)	
1	02/07/2021	02/13/2021	EXAD	000500	LICENSE EXAM ADMINISTRATION (EXAD)	
1	02/14/2021	02/20/2021	EXAD	000500	LICENSE EXAM ADMINISTRATION (EXAD)	

IP 22 Inspection Activity Plan Report

Perry

07/01/2020 - 06/30/2022

Unit	Start	End	Activity	CAC	Title	Staff Count
Radiation Protection Baseline Inspection						1
1	02/01/2021	02/05/2021	IP 71124.08	000732	Radioactive Solid Waste Processing & Radioactive Material Handling, Storage, & Transportation	
Emergency Preparedness Baseline Inspection / Performance Indicator Verification						1
1	02/08/2021	02/12/2021	IP 71114.02	000717	Alert and Notification System Testing	
1	02/08/2021	02/12/2021	IP 71114.03	000718	Emergency Response Organization Staffing and Augmentation System	
1	02/08/2021	02/12/2021	IP 71114.05	000720	Maintenance of Emergency Preparedness	
1	02/08/2021	02/12/2021	IP 71151	001397	Performance Indicator Verification	
Corporate Security Baseline Inspection						1
1, 2	02/08/2021	02/12/2021	IP 71130.01	000733	Access Authorization	
Inservice Inspection Perry						1
1	03/01/2021	03/29/2021	IP 71111.08G	000701	Inservice Inspection Activities (BWR)	
Radiation Protection Baseline Inspection						1
1	03/15/2021	03/19/2021	IP 71124.01	000725	Radiological Hazard Assessment and Exposure Controls	
1	03/15/2021	03/19/2021	IP 71124.02	000726	Occupational ALARA Planning and Controls	
OPC Temporary Instruction 2515/194						1
1	04/24/2021	04/28/2021	TI 2515/194	000512	Inspection of the Licensee's Implementation of Industry Initiative Associated With the Open Phase Condition Design Vulnerabilities In Electric Power Systems (NRC Bulletin 2012-01)	
Security Baseline Inspection						1
1, 2	04/26/2021	04/30/2021	IP 71130.02	000734	Access Control	
1, 2	04/26/2021	04/30/2021	IP 71130.14		Review of Power Reactor Target Sets	

IP 22 Inspection Activity Plan Report

Perry

07/01/2020 - 06/30/2022

Unit	Start	End	Activity	CAC	Title	Staff Count
Biennial Problem Identification and Resolution Inspection						4
1	05/24/2021	06/11/2021	IP 71152B	000747	Problem Identification and Resolution	
Design Basis Assurance Inspection (Programs)						3
1	06/28/2021	07/19/2021	IP 71111.21N.02	001645	Design-Basis Capability of Power-Operated Valves Under 10 CFR 50.55a Requirements	
Triennial Fire Protection Inspection						3
1	09/13/2021	10/01/2021	IP 71111.21N.05	001646	Fire Protection Team Inspection (FPTI)	
Security Baseline Inspection						1
1, 2	09/20/2021	09/24/2021	IP 71130.07	000739	Security Training	
1, 2	09/20/2021	09/24/2021	IP 71151	001338	Performance Indicator Verification	
1, 2	10/01/2021	12/31/2021	IP 71130.09	001656	Security Plan Changes	
Radiation Protection Baseline Inspection						1
1	11/29/2021	12/03/2021	IP 71124.02	000726	Occupational ALARA Planning and Controls	
RP Baseline Inspection						1
1	03/21/2022	03/25/2022	IP 71124.03	000727	In-Plant Airborne Radioactivity Control and Mitigation	
1	03/21/2022	03/25/2022	IP 71124.04	000728	Occupational Dose Assessment	
Cyber Security Inspection						4
1	03/21/2022	04/08/2022	IP 71130.10P	000741	Cyber Security	
ISFSI Preoperational and Initial Loading 2Q2022						4
1	05/23/2022	05/27/2022	IP 60856.1	001002	Review of 10 CFR 72.212(b) Evaluations at Operating Plants	

IP 22 Inspection Activity Plan Report

Perry

07/01/2020 - 06/30/2022

Unit	Start	End	Activity	CAC	Title	Staff Count
ISFSI Preoperational and Initial Loading 2Q2022						
1	06/06/2022	06/10/2022	IP 60854.1	000589	Preoperational Testing of Independent Spent Fuel Storage Facility Installation at Operating Plants	4
RP Baseline Inspection						
1	06/06/2022	06/10/2022	IP 71124.07	000731	Radiological Environmental Monitoring Program	1