

David B. Hamilton
Vice President

440-280-5382

~~PERSONALLY IDENTIFIABLE INFORMATION - WITHHOLD UNDER 10 CFR 2.390~~
(May be decontrolled upon removal of enclosures A, B, C and E)

June 14, 2016
L-16-160

10 CFR 2.201

ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001SUBJECT:
Perry Nuclear Power Plant
Docket No. 50-440, License No. NPF-58
Response to Request for Additional Information Regarding VIO 05000440/2015010-01

By correspondence dated January 15, 2016, (Accession No. ML16020A453) FirstEnergy Nuclear Operating Company (FENOC) submitted a response to notice of violation (VIO) 0500440/2015010-01, Unqualified Radiation Protection Manager.

By correspondence dated February 1, 2016, (Accession No. ML16033A194) the NRC requested additional information to complete the staff's review. FENOC's submitted a response on February 24, 2016, (Accession No. ML 16057A810).

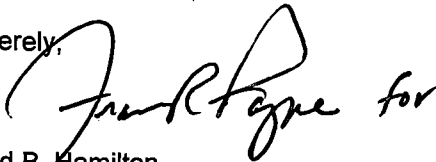
By correspondence dated April 19, 2016, (Accession No. ML116110A423) the NRC requested additional information pertaining to FENOC's initial response for additional information. The additional information is contained within Attachment 1.

A teleconference was held with NRC Region III staff on May 3, 2016, to clarify the requested additional information. At this time an extension to the required response was approved to allow FENOC time to address NRC staff concerns and facilitate additional discussions prior to final submittal.

Enclosures A, B, C and E contain personally identifiable information and should be withheld from public disclosure under 10 CFR 2.390

There are no regulatory commitments contained in this letter. If there are any questions, or if additional information is required, please contact Mr. Nicola Conicella, Manager - Regulatory Compliance, at (440) 280-5415.

Sincerely,



David B. Hamilton

IEDI
NRR

Attachment:

1. Second Response to Request for Additional Information Regarding VIO
05000440/2015010-01

Enclosures

- A. NOP-SS-4002-01, Personnel Qualification Checklist
- B. Fleet Oversight Memo FMOV 15-001
- C. DSO Memo to File
- D. USAR Change Notice 16-085
- E. GPM Memo Designating Tec. Spec. Qualified RPM and Radiation Protection Department
Brief
- F. Condition Report 2016-06326

cc: NRC Region III Administrator
NRC Resident Inspector

Attachment 1
L-16-160

Second Response to Request for Additional Information
Regarding VIO 05000440/2015010-01

Page 1 of 5

By correspondence dated January 15, 2016, (Accession No. ML16020A453) FirstEnergy Nuclear Operating Company (FENOC) submitted a response to notice of violation (VIO) 0500440/2015010-01, Unqualified Radiation Protection Manager.

By correspondence dated February 1, 2016, (Accession No. ML16033A194) the NRC requested additional information to complete the staff's review. FENOC submitted a response on February 24, 2016, (Accession No. ML16057A810).

By correspondence dated April 19, 2016, (Accession No. MLx116110A423) the NRC requested additional information pertaining to FENOC's response to the request for additional information. The request for additional information (RAI) is presented in bold type, followed by the FENOC response.

RAI-1

The failure to implement a formal process to resolve questions and issues regarding the incorrect conclusion determined by NOP-SS-4002 does not address the issue that NOP-SS-4002 failed to identify that the candidate for Radiation Protection Manager did not meet the minimum requirements of your license to operate the nuclear power plant.

Your response indicates that your selection, qualification, and verification process (procedure NOP-SS-4002) did not ensure that the Radiation Protection Manager was qualified for the position before designation. Your response also indicates that NOP-SS-4002 does not need to be revised and therefore, may suggest that the instructions were not implemented as written. The response provided does not fully address the concern that NOP-SS-4002 was not implemented as written and therefore, we are requesting additional information to help in our review.

Please indicate if NOP-SS-4002 was implemented as written. If it was, please indicate how it was determined that no revision was necessary; if it was not, please indicate why. In addition, please provide any and all data associated with the selection of the candidate and the verification that the candidate satisfied the minimum requirements for Radiation Protection Manager. Please include a timeline for these activities.

Response:

NOP-SS-4002 was implemented as written. This procedure provides the methods and requirements to verify that the education and experience of personnel selected to fill positions that meet the functional levels and responsibilities detailed in ANSI N18.1-1971, Selection and Training of Nuclear Power Plant Personnel, meet or exceed the minimum qualifications listed in this standard. This includes Nuclear Regulatory Commission license requirements.

The procedure is generic in nature and references the specific regulatory guidance to ensure proper qualifications are met. In this case, RG 1.8 was referenced within the procedure to ensure compliance with the requirement for the Radiation Protection Manager (RPM).

The reason for the violation was the failure to implement an available formal process (i.e., Corrective Action Program, Operational Decision Making, etc.) when the qualifications of the designated RPM were questioned. Therefore, inputs from different organizations, and new facts (i.e., level of commitment to Regulatory Guide 1.8 – September 1975) were not documented, considered or addressed in a formal process to ensure risk was addressed and the proper decision was made.

When performing the review of the RPM candidate's qualifications it was mistakenly determined the candidate was qualified based on credit for experience as a radiation protection technician,

specific radiation protection related assignments and as a licensed SRO qualified as a Unit Supervisor meeting the professional experience requirements.

The basis for determining the RPM candidate met the professional qualification requirements is the interpretation of the Technical Specification 5.3.1 requirement as meaning the RPM qualifications shall be in accordance with Regulatory Guide 1.8-1975 not ANSI N18.1-19-1971. Therefore, the regulatory guide specifies requirements that the RPM "should" meet as opposed to "shall" meet. NUREG/CR-5569 Rev. 1, Health Physics Positions Data Base, HPPOS-113, was referenced in making this determination. HPPOS-113 states: "Enforcement can be made against those sections of the Regulatory Guides referenced in the Regulations as "shall", but enforcement cannot be made against those sections which are recommended "should" or allowed as optional "may"."

A corrective action was implemented to provide a lessons learned presentation of this violation for all Perry Nuclear Power Plant (PNPP) management and designated FENOC management and Oversight personnel.

Based on discussions with NRC Region III staff, FENOC will review NOP-SS-4002 and make appropriate revisions to provide guidance for similar circumstances involving personnel selections in the future. This action is being tracked by condition report 2016-06326 (Enclosure F).

See Enclosure A through Enclosure D for documents pertaining to the selection of the candidate.

The timeline of activities, as documented in condition report 2015-16548, is as follows:

Date	Event
March 30, 2015	Reg. Compliance requested by DSO to review qualifications of RPM candidate. Reg. Compliance concluded individual was qualified after reviewing TS 5.3.1, ANSI 18.1-1971 and Reg. Guide 1.8-1975. Reg. Compliance considered time as RP technician and control room unit supervisor as meeting professional experience requirements.
April 6, 2015	Candidate named Acting Manager Radiation Protection (MRP)
April 7, 2015	Personnel Qualification Checklist, NOP-SS-4002-01 Rev. 2, completed by HR Representative and Reg. Compliance. (Enclosure A)
April 29, 2015	Fleet Oversight issues memo FMOV 15-001 to DSO detailing difference of opinion regarding the Acting MRP professional experience as required by Reg. Guide 1.8-1975. (Enclosure B)
April 30, 2015 ¹	Reg. Compliance completes draft ODMI recommending designating a qualified individual as RPM and delegate certain duties to the current Acting MRP as a solution to the Fleet Oversight concern. The basis for this ODMI was an assumption that a determination would be made by PNPP management that the Acting MRP did not meet the Reg. Guide 1.8-1975 qualification requirements.
July 29, 2015 ¹	DSO issues memo to file to regarding concerns with minimum time of professional experience by identifying additional actions to address potential vulnerabilities with selecting an RPM with non-traditional experience. The NRC in Inspection Report 05000440/2015010 stated that these actions did not restore compliance. (Enclosure C)
August 13, 2015	E-mail from Director – Fleet Regulatory Affairs to DSO regarding discussions held with NRC Region III Health Physics Branch stating that 1) The Health Physics Branch does not consider being a supervisor in the plant, regardless of license status, as meeting the professional time requirements and 2) that Perry committed through our license (TS 5.3.1) to meet the minimum

Date	Event
	requirements of Reg. Guide 1.8. Three recommendations were provided by Fleet Regulatory Affairs; 1) review work experience for actual time performing professional radiation protection duties; 2) develop compensatory measures that provide for candidate continuing in position but ensure RPM duties are not compromised; 3) pursue temporary TS change to allow compensatory measures to be in place until professional time requirement is fulfilled.
August 28, 2015 ¹	NRC inspectors verbally notified Site Vice President that, in their opinion, the acting MRP did not satisfy the requirements for the position as RPM.
September 29, 2015	USAR Change Notice 15-165 initiated to allow for the assignment of a TS qualified RPM in the event the Manager, Radiation Protection Section does not fully satisfy the Reg. Guide 1.8 requirements. (Enclosure D)
October 5, 2015	USAR Change Notice 15-165 approved.
October 19, 2015	Acting MRP named Manager- Radiation Protection Section without additional compensatory measures to ensure RPM duties are not compromised.
November 30, 2015	Exit meeting held with NRC Region III personnel, by teleconference, to debrief cited violation for RPM not meeting the TS 5.3.1 requirements.
December 4, 2015	NRC issues inspection report 05000440/2015010 with GREEN cited violation 05000440/201510-01 for RPM not meeting the TS 5.3.1 requirements.
December 9, 2015	CR 2015-16548 initiated to document cited violation.

1. These events occurred on or about the date indicated.

RAI-2

We have reviewed the provided USAR Change Notice and request a clarification before we can assess compliance with NRC requirements. Specific areas are the insertions "A" and "B" of the USAR Change Notice:

Insert A (Replaces Bubble A on page 12.5-1):

The Manager, Radiation Protection Section is designated as the Radiation Protection Manager defined in "Regulatory Guide 1.8." He is responsible for directing all activities associated with radiation protection and other radiological control services required to support plant operation and maintenance activities. This includes all radiation protection activities and for conducting the plant radiological survey activities required to ensure that personnel exposure to radiation and radioactive materials is maintained within regulatory guidelines and that such exposure is kept as-low-as-reasonably-achievable (ALARA). If the Manager, Radiation Protection Section, does not meet the qualifications specified in "Regulatory Guide 1.8," a qualified individual shall be designated as the technical specification qualified RPM, who shall be responsible for all aforementioned activities for which the RPM is responsible, including reviewing, approving and signing/countersigning all associated documents. The Manager, Radiation Protection Section reports to the General Plant Manager.

Insert B (Replaces Bubble B on page 13.1-16):

Manager, Radiation Protection Section

The Manager, Radiation Protection Section is designated as the RPM defined in "Regulatory Guide 1.8." His responsibilities include, but are not limited to, directing all activities associated with radiation protection and other radiological control services

required to support plant operation and maintenance activities. This includes conducting the plant radiological survey activities required to ensure that personnel exposure to radiation and radioactive materials is maintained within regulatory guidelines and that such exposure is kept ALARA. If the Manager, Radiation Protection Section, does not meet the qualifications specified in "Regulatory Guide 1.8," a qualified individual shall be designated as the technical specification qualified RPM. Who shall be responsible for all aforementioned activities for which the RPM is responsible, including reviewing, approving and signing/countersigning all associated documents. The Manager, Radiation Protection Section reports to the General Plant Manager.

It was understood that the revisions were made to address situations when the Manager, Radiation Protection Section, was not qualified to be the technical specification RPM, as in the current conditions at Perry. However, in this situation, it appears the two individuals either have the same responsibilities or share the responsibilities, please clarify. Additionally, the revision does not describe the reporting chain of the technical specification qualified RPM in the current conditions. Furthermore, please describe the communication methods used to ensure that technical questions raised by the plant staff related to radiation safety are directed to the appropriate individual. Report page(s) and any supporting evaluation documentation associated with this change.

Response:

USAR Change Notice 15-165 was initiated to define clear lines of responsibility when the Manager – Radiation Protection Section did not meet the requirements of Technical Specification 5.3.1 by naming a qualified individual to perform the duties of the Radiation Protection Manager.

Based on discussions with NRC Region III staff, FENOC has made the appropriate USAR changes, under USAR Change Notice 16-085 (Enclosure D), to clarify the separation of duties and organizational reporting put in place by USAR Change Notice 15-165. This action was completed under condition report 2016-06326.

Additionally, FENOC will review applicable documentation, including the Quality Assurance Program Manual, determine if changes are required to organization charts or job descriptions for the Manager Radiation Protection Sections and the Technical Specification RPM and effect any required changes. This action is being tracked under condition report 2016-06326.

The General Plant Manager has issued a memorandum designating the Technical Specification qualified Radiation Protection Manager, the assigned duties and the designated individuals direct reporting to the General Plant Manager or Site Vice-President for sufficient operational freedom to assure independence from operational pressures. Additionally, a Radiation Department Briefing was distributed to Radiation Protection personnel detailing the communication requirements to assure technical questions raised by the plant staff related to radiation safety are directed to the appropriate individual; and restating that at any time, any individual has the right to take information to the highest levels of the organization, or outside the organization if they feel it necessary. (Enclosure E)

Enclosure D
L-16-160

USAR Change Notice 16-085

CHANGE NOTICE FORM

NOP-LP-4008-01 Rev. 02

mfm 6/6/2016

Page 1 of 911

SECTION 1 - INITIATION

☐ BV1 ☐ BV2 ☐ DB ☒ PY

Change Notice No. 16-085

☒ UFSAR ☐ Technical Specification Bases ☐ TRM ☐ 10 CFR 72.212 Report ☐ DCSS-FSAR

Affected Sections, Tables, Figures (Attach applicable pages, annotated as necessary to indicate proposed changes.)

Section	Pages Attached	Section	Pages Attached
12.5.1	12.5-1		
13.1.2.2.1	13.1-16		

Initiating Document or Activity:

Personnel Assignment

Description and basis for change:

☐ Additional pages attached

This change delineates the distinction in responsibilities by position for the Radiation Protection Manager (RPM) and the Manager, Radiation Protection Section at the Perry Nuclear Power Plant. It also provides additional information with respect to these two positions.

CN16-085 marks-up CN15-165, see attached. CN15-165 was approved in October 2015.

Additional supporting documents:

RAD-Exempt UFSAR Change Evaluation Form (NOP-LP-4008-02)

Attached ☐Not required ☒

RAD Form (Form NOP-LP-4003-01)

Attached ☒Not required ☐

10CFR50.59 Screen (Form NOP-LP-4003-02)

Attached ☐Not required ☒

10CFR50.59 Evaluation (Form NOP-LP-4003-03)

Attached ☐Not required ☒

Approved Operating License Amendment

Attached ☐Not required ☒

Other (Required by RAD):

Attached ☐Not required ☒

Preparer:

Matt Minniti

Matt Minniti

Date:

5/26/16

Supervisor:

Tom L

Date:

5/26/2016

SECTION 2 - REVIEW AND APPROVAL

Section Owner Reviewer:	Comments Provided: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Date
C. Elliott (12.5)		5/31/2016
Section Owner Reviewer:	Comments Provided: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Date
M. Imobersteg (13.1)		6/2/16
Other Reviewer:	Comments Provided: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Date
J. Spahr (RPM)		5-31-16
Other Reviewer:	Comments Provided: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Date
T. Brown		6/1/16
Fleet Licensing Reviewer:	Comments Provided: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Date
CAL HEINTZ		6/6/16
Section Owner Manager Approval:	Comments Provided: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Date
C. Elliott (12.5)		6-8-16

SECTION 3 - INCORPORATION

Document Revision	Effective Date	<input type="checkbox"/> Operations Training Complete
		<input type="checkbox"/> Operations Training Not Required
Incorporation Verified by Fleet Licensing	Comments Provided: Yes <input type="checkbox"/> No <input type="checkbox"/>	Date:

CHANGE NOTICE FORM

NOP-LP-4008-01 Rev. 02

Page 2 of 9

SECTION 1 - INITIATION

☐ BV1 ☐ BV2 ☐ DB ☒ PY

Change Notice No. 16-085

☒ UFSAR ☐ Technical Specification Bases ☐ TRM ☐ 10 CFR 72.212 Report ☐ DCSS-FSAR

Affected Sections, Tables, Figures (Attach applicable pages, annotated as necessary to indicate proposed changes.)

Section	Pages Attached	Section	Pages Attached
12.5.1	12.5-1		
13.1.2.2.1	13.1-16		

Initiating Document or Activity:

Personnel Assignment

Description and basis for change:

☐ Additional pages attached

This change delineates the distinction in responsibilities by position for the Radiation Protection Manager (RPM) and the Manager, Radiation Protection Section at the Perry Nuclear Power Plant. It also provides additional information with respect to these two positions.

CN16-085 marks-up CN15-165, see attached. CN15-165 was approved in October 2015.

Additional supporting documents:

RAD-Exempt UFSAR Change Evaluation Form (NOP-LP-4008-02)

Attached ☐

Not required ☒

RAD Form (Form NOP-LP-4003-01)

Attached ☒

Not required ☐

10CFR50.59 Screen (Form NOP-LP-4003-02)

Attached ☐

Not required ☒

10CFR50.59 Evaluation (Form NOP-LP-4003-03)

Attached ☐

Not required ☒

Approved Operating License Amendment

Attached ☐

Not required ☒

Other (Required by RAD):

Attached ☐

Not required ☒

Preparer:

Matt Minniti

Date:

5/26/16

Supervisor:

Tom R

Date:

5/26/2016

SECTION 2 - REVIEW AND APPROVAL

Section Owner Reviewer:

C. Elliott (12.5)

Comments Provided: Yes ☐ No ☒

Date 5/31/2016

Section Owner Reviewer:

M. Imobersteg (13.1)

Comments Provided: Yes ☐ No ☒

Date 6/2/16

Other Reviewer:

J. Spahr (RPM)

Comments Provided: Yes ☐ No ☒

Date 5-31-16

Other Reviewer:

T. Brown

Comments Provided: Yes ☐ No ☒

Date 6/1/16

Fleet Licensing Reviewer:

CAL HEINTZ

Comments Provided: Yes ☐ No ☒

Date 6/6/16

Section Owner Manager Approval:

J. Spahr (RPM)

Comments Provided: Yes ☐ No ☒

Date 6-8-16

SECTION 3 - INCORPORATION

Document Revision

Effective Date

☐ Operations Training Complete

☐ Operations Training Not Required

Incorporation Verified by Fleet Licensing

Comments Provided: Yes ☐ No ☐

Date:

m/m 6/6/2016

CHANGE NOTICE FORM

NOP-LP-4008-01 Rev. 02

Page ³ of ⁹ 11

SECTION 1 - INITIATION

☐ BV1 ☐ BV2 ☐ DB ☒ PY

Change Notice No. 16-085

☒ UFSAR ☐ Technical Specification Bases ☐ TRM ☐ 10 CFR 72.212 Report ☐ DCSS-FSAR

Affected Sections, Tables, Figures (Attach applicable pages, annotated as necessary to indicate proposed changes.)

Section	Pages Attached	Section	Pages Attached
12.5.1	12.5-1		
13.1.2.2.1	13.1-16		

Initiating Document or Activity:
Personnel Assignment

Description and basis for change:

☐ Additional pages attached

This change delineates the distinction in responsibilities by position for the Radiation Protection Manager (RPM) and the Manager, Radiation Protection Section at the Perry Nuclear Power Plant. It also provides additional information with respect to these two positions.

CN16-085 marks-up CN15-165, see attached. CN15-165 was approved in October 2015.

Additional supporting documents:

RAD-Exempt UFSAR Change Evaluation Form (NOP-LP-4008-02)

Attached ☐

Not required ☒

RAD Form (Form NOP-LP-4003-01)

Attached ☒

Not required ☐

10CFR50.59 Screen (Form NOP-LP-4003-02)

Attached ☐

Not required ☒

10CFR50.59 Evaluation (Form NOP-LP-4003-03)

Attached ☐

Not required ☒

Approved Operating License Amendment

Attached ☐

Not required ☒

Other (Required by RAD):

Attached ☐

Not required ☒

Preparer:

Matt Minniti *Matt Minniti*

Date:

5/26/16

Supervisor:

Tom L

Date:

5/26/2016

SECTION 2 - REVIEW AND APPROVAL

Section Owner Reviewer:

C. Elliott(12.5)

C. Elliott

Comments Provided: Yes ☐ No ☒

Date

5/31/2016

Section Owner Reviewer:

M. Imobersteg (13.1)

M. Imobersteg

Comments Provided: Yes ☐ No ☒

Date

6/2/16

Other Reviewer:

J. Spahr (RPM)

J. Spahr

Comments Provided: Yes ☐ No ☒

Date

5-31-16

Other Reviewer:

T. Brown

T. Brown

Comments Provided: Yes ☐ No ☒

Date

6/1/16

Fleet Licensing Reviewer:

CAL HEINTZ

CAL HEINTZ

Comments Provided: Yes ☐ No ☒

Date

6/6/16

Section Owner Manager Approval:

M. Imobersteg (13.1)

M. Imobersteg

Comments Provided: Yes ☐ No ☒

Date

6/8/16

SECTION 3 - INCORPORATION

Document Revision

Effective Date

☐ Operations Training Complete

☐ Operations Training Not Required

Incorporation Verified by Fleet Licensing

Comments Provided: Yes ☐ No ☐

Date:

678 mfm
10/6/1512.5 RADIATION PROTECTION PROGRAM

This change notice (CN-15-165):
Delete Bubble A and replace with Insert A

12.5.1 ORGANIZATION

Bubble A

~~The Manager, Radiation Protection Section is designated as the Radiation Protection Manager defined in <Regulatory Guide 1.8>. He is responsible for directing all activities associated with radiation protection and other radiological control services required to support plant operation and maintenance activities. This includes all radiation protection activities and for conducting the plant radiological survey activities required to ensure that personnel exposure to radiation and radioactive materials is maintained within regulatory guidelines and that such exposure is kept as low as reasonably achievable (ALARA). The Manager, Radiation Protection reports to the Director, Site Operations Department.~~

General Plant Manager

~~The Radiation Protection Supervisors are responsible for the oversight of the Radiation Protection Technicians and the implementation of the operational Radiation Protection Program.~~

The Radiation Protection Technicians perform the various radiological surveys and associated analysis to ensure compliance with the radiation protection program. At least one Radiation Protection Technician is provided for each shift.

Qualification and training requirements for the Radiation Protection Section's supervisory positions are described in <Section 13.1.2.2>, <Section 13.1.3.2>, and <Section 13.2.3>.

CN 16-085 P8. 4 11
Z 7 9
mfm 6/8/16

operation upon the environment, obtaining appropriate state and federal permits for air and water, and reporting as necessary to demonstrate compliance with applicable environmental regulations. The chemistry activities include development and implementation of the chemistry program, wet chemistry, plant process chemistry, system operations performed by chemistry and monitoring of all plant systems for chemical parameters to ensure compliance with regulatory requirements and industry guidance. The Manager, Site Chemistry, reports to the

~~Director, SOD.~~

General Plant Manager

Manager, Site Radiation Protection Section

Bubble B The Manager, Site Radiation Protection Section is designated as the Radiation Protection Manager defined in <Regulatory Guide 1.8>. His responsibilities include, but are not limited to, directing all activities associated with radiation protection and other radiological control services required to support plant operation and maintenance activities. This includes conducting the plant radiological survey activities required to ensure that personnel exposure to radiation and radioactive materials is maintained within regulatory guidelines and that such exposure is kept as low as reasonably achievable (ALARA). The Manager, Site Radiation Protection reports to the

~~Director, SOD.~~

Manager, Site Outage Management Section

General Plant Manager

The Manager, Site Outage Management Section, responsibilities include, but are not limited to, directing the scheduling and coordination of all plant outages. The Manager, Site Outage Management Section, reports to the

~~Director, SOD.~~

General Plant Manager

This change notice (CN-15-165):
Delete Bubble B and replace with
Insert B

BFB m/m
10/6/15

Change Notice 15-165

Insert A (Replaces Bubble A on page 12.5-1):

CN 16-085 DELSTDS
TH.3 PARAGRAPH AND
ADDS INSERT 1

The Manager, Radiation Protection Section is designated as the Radiation Protection Manager defined in <Regulatory Guide 1.8>. He is responsible for directing all activities associated with radiation protection and other radiological control services required to support plant operation and maintenance activities. This includes all radiation protection activities and for conducting the plant radiological survey activities required to ensure that personnel exposure to radiation and radioactive materials is maintained within regulatory guidelines and that such exposure is kept as low as reasonably achievable (ALARA). If the Manager, Radiation Protection Section, does not meet the qualifications specified in <Regulatory Guide 1.8>, a qualified individual shall be designated as the technical specification qualified Radiation Protection Manager, who shall be responsible for all aforementioned activities for which the Radiation Protection Manager is responsible, including reviewing, approving and signing/countersigning all associated documents. The Manager, Radiation Protection Section reports to the General Plant Manager.

Insert B (Replaces Bubble B on page 13.1-16):

Manager, Radiation Protection Section

CN 16-085 DELSTDS
TH.3 PARAGRAPH AND
ADDS INSERT 2

The Manager, Radiation Protection Section is designated as the Radiation Protection Manager defined in <Regulatory Guide 1.8>. His responsibilities include, but are not limited to, directing all activities associated with radiation protection and other radiological control services required to support plant operation and maintenance activities. This includes conducting the plant radiological survey activities required to ensure that personnel exposure to radiation and radioactive materials is maintained within regulatory guidelines and that such exposure is kept as low as reasonably achievable (ALARA). If the Manager, Radiation Protection Section, does not meet the qualifications specified in <Regulatory Guide 1.8>, a qualified individual shall be designated as the technical specification qualified Radiation Protection Manager, who shall be responsible for all aforementioned activities for which the Radiation Protection Manager is responsible, including reviewing, approving and signing/countersigning all associated documents. The Manager, Radiation Protection Section reports to the General Plant Manager.

m/m 6/8/16

6 11
CN 16-085 PG 4 of 4

CN 16-085

Insert 1 (Replaces Bubble A on page 12.5-1 contained in CN 15-165):

The Manager, Radiation Protection Section is designated as the Radiation Protection Manager [as] defined in <Regulatory Guide 1.8>. [The Radiation Protection Manager]* is responsible for directing all activities associated with radiation protection and other radiological control services required to support plant operation and maintenance activities. This includes all radiation protection activities and for conducting the plant radiological survey activities required to ensure that personnel exposure to radiation and radioactive materials is maintained within regulatory guidelines and that such exposure is kept as low as reasonably achievable (ALARA). If the Manager, Radiation Protection Section, does not meet the [Radiation Protection Manager] qualifications specified in <Regulatory Guide 1.8>, a[n] individual, [who meets the Radiation Protection Manager qualifications specified in <Regulatory Guide 1.8>], shall be designated as the technical specification qualified Radiation Protection Manager, who shall be responsible for all [of the] aforementioned activities for which the Radiation Protection Manager is responsible, including reviewing, approving and signing/countersigning all associated documents. [The Radiation Protection Manager has direct reporting authorization to the General Plant Manager and/or the Site Vice President and shall have sufficient operational freedom to ensure independence from operating pressures in order to carry out radiation protection duties. The Manager, Radiation Protection Section is responsible for staffing, budgeting, department coordination activities, and other non-technical specification Radiation Protection Manager related duties.] The Manager, Radiation Protection Section reports to the General Plant Manager.

* The information contained within the brackets is the information associated with CN 16-085. Note to Typist, the brackets should NOT be included in the actual USAR revision.

mfm 6/8/16

*CN 16-085 pg 5 ⁷ 11
4 9*

Insert 2 (Replaces Bubble B on page 13.1-16 contained in CN 15-165):

Manager, Radiation Protection Section

The Manager, Radiation Protection Section is designated as the Radiation Protection Manager [as] defined in <Regulatory Guide 1.8>. [The Radiation Protection Manager]* responsibilities include, but are not limited to, directing all activities associated with radiation protection and other radiological control services required to support plant operation and maintenance activities. This includes conducting the plant radiological survey activities required to ensure that personnel exposure to radiation and radioactive materials is maintained within regulatory guidelines and that such exposure is kept as low as reasonably achievable (ALARA). If the Manager, Radiation Protection Section, does not meet the [Radiation Protection Manager] qualifications specified in <Regulatory Guide 1.8>, a[n] individual, [who meets the Radiation Protection Manager qualifications specified in <Regulatory Guide 1.8>], shall be designated as the technical specification qualified Radiation Protection Manager, who shall be responsible for all [of the] aforementioned activities for which the Radiation Protection Manager is responsible, including reviewing, approving and signing/countersigning all associated documents. [The Radiation Protection Manager has direct reporting authorization to the General Plant Manager and/or the Site Vice President and shall have sufficient operational freedom to ensure independence from operating pressures in order to carry out radiation protection duties. The Manager, Radiation Protection Section is responsible for staffing, budgeting, department coordination activities, and other non-technical specification Radiation Protection Manager related duties.] The Manager, Radiation Protection Section reports to the General Plant Manager.

* The information contained within the brackets is the information associated with CN 16-085. Note to Typist, the brackets should NOT be included in the actual USAR revision.

m/pn 6/8/16

8 11

CN16-085 pg. 6 of 9

FirstEnergy NOP-LP-4003-01 Rev. 03	REGULATORY APPLICABILITY DETERMINATION Page 1 of 2		No. 16-01788 Rev. 00
	Initiating Activity No. USAR CN 16-085		Rev. 0
<input type="checkbox"/> BVPS 1 <input type="checkbox"/> BVPS 2 <input type="checkbox"/> DBNPS <input checked="" type="checkbox"/> PNPP			

Title:

Change Notice 16-085 - Updates the Perry USAR to delineate the distinction between RPS Manager and RPM responsibilities

Brief description of activity (what is being changed and why):

Change Notice (CN) 15-165 updates the Perry USAR regarding the organizational descriptions that provide for the assignment of an individual as a Radiation Protection Manager (RPM), who satisfies the Regulatory Guide 1.8 RPM qualifications, in the event the Manager, Radiation Protection Section does not fully satisfy Regulatory Guide 1.8 qualifications.

This CN revises CN 15-165 by delineating the responsibilities of both the RPM and the Radiation Protection Section, Manager. It also provides the RPM's reporting authority assuming an Individual other than the Radiation Protection Section, Manager is filling the position of the RPM.

CN 16-085 updates the CN 15-165 changed pages. This was done for clarity and ease of processing the two USAR CNs.

1. EXEMPTIONS

Is the scope of the entire activity exempt from the 10CFR50.59 process because it is limited to:

- 1.1 Managerial or administrative changes..... ☒ YES ☐ NO
- 1.2 UFSAR changes (or equivalent information) excluded from the requirement to perform a 10CFR50.59 Screen and Evaluation by NEI 96-07 or NEI 98-03?..... ☐ YES ☒ NO
- 1.3 Maintenance activities and temporary alterations in support of maintenance planned for 90 days or less while at power ☐ YES ☒ NO
- 1.4 Changes evaluated under another program that included a 10CFR50.59 Screen..... ☐ YES ☒ NO

2. OTHER REGULATIONS

2.1 Does the activity require a license amendment?

- 2.1.1 Operating License..... ☐ YES ☒ NO
- 2.1.2 Technical Specifications..... ☐ YES ☒ NO
- 2.1.3 Environmental Protection Plan (BVPS and PNPP only)..... ☐ YES ☒ NO

2.2 Is the activity or any portion of the activity governed by one or more of the following regulations:

- 2.2.1 Quality Assurance Program (10CFR50.54(a))..... ☐ YES ☒ NO
- 2.2.2 Security Plans (10CFR50.54(p))..... ☐ YES ☒ NO
- 2.2.3 Emergency Plan (10CFR50.54(q))..... ☐ YES ☒ NO
- 2.2.4 IST Program Plan (10CFR50.55(a)(f))..... ☐ YES ☒ NO
- 2.2.5 ISI Program Plan (10CFR50.55(a)(g))..... ☐ YES ☒ NO
- 2.2.6 Fire Protection Program (10CFR50.48)..... ☐ YES ☒ NO
- 2.2.7 Independent Spent Fuel Storage Facility (10CFR72.48)..... ☐ YES ☒ NO
- 2.2.8 Another regulation:
 - Standards For Protection Against Radiation (10 CFR 20 including ODCM)..... ☐ YES ☒ NO
 - Specific Exemptions (10 CFR 50.12)..... ☐ YES ☒ NO
 - ECCS Acceptance Criteria (10 CFR 50.46)..... ☐ YES ☒ NO
 - Environmental Protection (DBNPS only)..... ☒ YES ☐ NO
 - Other - list the regulation(s): N/A..... ☐ YES ☒ NO

9 11
 CN 16-085 pg. 7 of 9
 mfm 6/6/26

FirstEnergy REGULATORY APPLICABILITY DETERMINATION NOP-LP-4003-01 Rev. 03	No. 16-01788
	Rev. 00
Initiating Activity No. USAR CN 16-085	Rev. 0
<input type="checkbox"/> BVPS 1 <input type="checkbox"/> BVPS 2 <input type="checkbox"/> DBNPS <input checked="" type="checkbox"/> PNPP	

3. CONCLUSION

- 3.1 Does 10CFR50.59 apply? ☐ YES ☒ NO
 3.2 Does this activity require a change to the UFSAR? Change Request No: **UCN 16-085** ☒ YES ☐ NO
 3.3 Summarize the bases for responses: Include Keywords used to search documents.

Keywords: Radiation Protection Manager, Radiation Protection Section

The proposed USAR changes clarify the USAR organization description of the Manager, Radiation Protection Section and the Radiation Protection Manager which are the result of organization changes. The proposed changes indicate the responsibilities of the two positions, and provide the reporting authority for the Radiation Protection Manager. The proposed USAR changes are not considered a modification to the facility or a procedure but per NOBP-LP-4003A are considered administrative, since they simply provide clarification of organizational responsibilities and as a result are not subject to 10 CFR 50.59. Therefore, Exemption 1.1 was marked YES.

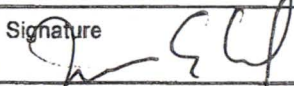

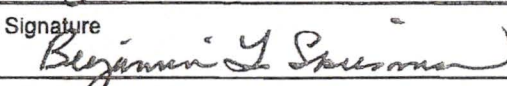
In addition, a "change," as defined in Section 3.3 of NEI 96-07, R1, means a "modification or addition to, or removal from, the facility or procedures that affects: (1) a design function, (2) method of performing or controlling the function, or (3) an evaluation that demonstrates that intended functions will be accomplished." Changes to the USAR-described organization does not meet this definition of "change." Therefore, such changes would not be subject to control under 10 CFR 50.59. Furthermore, the delineation of responsibilities between the Radiation Protection Section, Manager and the Radiation Protection Manager is similar to an example in Section 4.1.4 of NEI 96-07, R1 in that the NEI guidance describes changing the authority for performance of plant operations from one position to another position. The guidance states that this is not subject to 10 CFR 50.59.

Since the proposed changes to the USAR are administrative nor rise to the definition of a "change" listed in NEI 96-07, the proposed changes to the USAR meet the criteria for exemption from the 10 CFR 50.59 process as indicated in Exemption 1.1.

The proposed USAR changes do not require changes to the Operating License, Technical Specifications, or the Environmental Protection Plan, nor to any of the regulations listed under Sections 2.2.2 through 2.2.8.

10 CFR 50.54(a) applies to the FENOC Quality Assurance Program Manual (QAPM), which provides a description of the corporate and site organizations responsible for implementing the quality assurance program. The Oversight organization has determined that the changes made by this USAR Change Notice do not require a revision to the FENOC QAPM.

As a result of the, neither 10 CFR 50.59 nor any other regulatory review and approval process applies to this USAR change.

Preparer (Print name) Emley, James E	Signature 	Date 5/26/2016
Reviewer (Print name) Spiesman, Benjamin L	Signature 	Date 5/26/2016
Database Updated <input checked="" type="checkbox"/>	Signature 	Date 5/26/2016

mfm 6/8/16

*10 11
CN16-085 ps. 879*

Minniti, Matthew J.

From: Mlachak, Mark D.
Sent: Thursday, May 26, 2016 2:38 PM
To: Emley, James E.
Cc: Minniti, Matthew J.; Lockard, Larry D.
Subject: RE: QAPM

Hello Jim.

Based on my review of the proposed UCN and the FENOC QAPM, no change to the QAPM is required.

Mark D. Mlachak
Manager Fleet Oversight
Office: (330) 436-1391
Cell: (440) 666-5124
Pager: (440) 733-2417

From: Emley, James E.
Sent: Thursday, May 26, 2016 9:38 AM
To: Mlachak, Mark D. <mdmlachak@firstenergycorp.com>
Cc: Minniti, Matthew J. <mjminniti@firstenergycorp.com>
Subject: QAPM

Mark- Attached is the new UCN wording for the RPM and Manager, RPS positions. I am developing the RAD for the UCN. I need to know if Oversight believes a change to the QAPM is required. The initial UCN for this issue stated that Oversight reviewed it and indicated no QAPM change is required. I need an e-mail response for this UCN. Thanks. Jim

mjm 6/8/16

*11 11
CN16-085 pg 9 of 9*

Enclosure F
L-16-160

Condition Report 2016-06326

Condition Reports					
Header					
CR Identifier		Origination Date		Originator's Department	
CR-2016-06326		05/04/2016		PY-PI-REGC-CO	
Category		Due Date			
AF		06/03/2016			
Title					
Request for Additional Information VIO 05000440/215010-01 Required Actions					
Discover Date		Discover Time		Event Date	
05/04/2016		13:21		05/04/2016	
Functional Location - System		Functional Location			
Equipment Description			AP-913		EP Equipment
Reference Manual EP Equipment	Identified By			QA Finding?	
	Individual			No	
N				N	
SRO Review Required but Initially Skipped	Number of Open Effectiveness Reviews	Number of All Open Forms			
		0			
No	0				
Condition Report					
Description of Condition and Probable Cause					
Based on discussions with NRC Region III staff regarding the Request for Additional Information VIO 05000440/215010-01 dated April 19, 2016, (R-16-078) the following actions are required to address the NRC concerns and close the violation:					
1. Review NOP-SS-4002, Personnel Selection, Qualifications and Employment Verification and make appropriate revisions to provide guidance for similar circumstances involving personnel selections in the future. 2. Revise USAR Change Notice 15-165 to clarify responsibilities and organizational reporting authority for the section manager and the Technical Specification designated RPM. 3. Clearly communicate to PNPP staff the responsibilities and organizational reporting authority for the section manager and the Technical Specification designated RPM.					
Immediate Actions Taken					
Initiated condition report and discussed with supervision.					
Recommended Actions					
Track the required actions through assigned corrective actions in this condition report.					
Documents (Procedures, Document Design, etc)					
Document					
NOP-SS-4002					
USAR Change Notice 15-165					
Activity/ Cause Codes					
Activity Code	Related Process Code	Cause Code Data	Component Type	Component Number	Related Corrective Actions
4000; TECHNICAL SPECIFICATION AND REGULATORY COMPLIANCE -- Actions associated with ensuring Technical Specification and related document compliance...		Add			
0885; Condition Reports - Regulatory Driven - Issues identified or driven by a regulatory agency. This event code can be used for multiple issues i...		Add			
Initial Reviews					
Contact					
N. Conicella					

Supervisor Comments							
No additional comments							
SRO Review Required?							
No							
MRB Comments							
MRB Questions							
CARB	IOE	EFC	MRW	MR	PE	NDT	10CFR21 Required?
							0
Brief							
SCR							
Investigation / Closure Summary							
Corrective Actions Taken							
Radiation Protection has completed communication to the RPS staff of the responsibilities and organizational reporting authority for the section manager and the Technical Specification designated RPM. This meets the intent of the NRC request. (See attachment)							
Corrective Actions Planned							
1. Reg. Compliance will review NOP-SS-4002, Personnel Selection, Qualifications and Employment Verification, and submit a DCR identifying required revisions to address lessons learned for similar circumstances involving personnel selections in the future.							
2.Reg. Compliance will revise USAR Change Notice 15-165 to clarify responsibilities and organizational reporting authority for the section manager and the Technical Specification designated RPM.							
Hardware / Degraded Condition Resolution Required							
No							
Does the CR involve information obtained or an observation made of a BASIC COMPONENT that could compromise safety?							
No							
Corrective Actions							
Workflow State	Due Date	Schedule Type	Corrective Action Type	Work Center	Related Cause Codes		
Respond	07/28/2016	A - Owner Assigned/Controlled	CA - Corrective Action	PY-PI-REGC; PY-Regulatory Compliance			
Closure Review	07/28/2016	A - Owner Assigned/Controlled	CA - Corrective Action	PY-PI-REGC; PY-Regulatory Compliance			
Respond	08/30/2016	A - Owner Assigned/Controlled	CA - Corrective Action	PY-PI-REGC; PY-Regulatory Compliance			
INPO Codes							
INPO Code							
NO INPO CODE; No INPO Code has been assigned to this CR.							
[Initial Review Checkboxes]							
C24:CS1							
N							
N							
Workbook Events							
Event	Status	Assigned to	Created by	Created on	Finished by	Finished on	
Initiate	Completed	Lockwood, David	Lockwood, David	05/04/2016 13:37 EDT	Lockwood, David	05/04/2016 13:37 EDT	
Supervisor Review	Completed	Zerr, Lloyd	Lockwood, David	05/04/2016 13:37 EDT	Zerr, Lloyd	05/04/2016 13:42 EDT	
SRO Review	Skipped		Zerr, Lloyd	05/04/2016 13:42 EDT	Zerr, Lloyd	05/04/2016 13:42 EDT	
MRB Review	Completed	CR CRPA Team - G202	Zerr, Lloyd	05/04/2016 13:42 EDT	Coggins, Kathleen	05/06/2016 09:31 EDT	
Awaiting Reportability	Skipped		Coggins, Kathleen	05/06/2016 09:31 EDT	Coggins, Kathleen	05/06/2016 09:31 EDT	
Assign Closure Summary	Completed	Conicella, Nicola	Coggins, Kathleen	05/06/2016 09:31 EDT	Zerr, Lloyd	05/06/2016 13:30 EDT	
Closure Summary	Completed	Lockwood, David	Zerr, Lloyd	05/06/2016 13:30 EDT	Lockwood, David	05/31/2016 13:51 EDT	
Pre-job Brief	Skipped		Lockwood, David	05/31/2016 13:51 EDT	Lockwood, David	05/31/2016 13:51 EDT	
Trainee Investigation	Skipped		Lockwood, David	05/31/2016 13:51 EDT	Lockwood, David	05/31/2016 13:51 EDT	
Investigation	Skipped		Lockwood, David	05/31/2016 13:51 EDT	Lockwood, David	05/31/2016 13:51 EDT	
Peer Review	Skipped		Lockwood, David	05/31/2016 13:51 EDT	Lockwood, David	05/31/2016 13:51 EDT	
Manager Approval	Completed	Conicella, Nicola	Lockwood, David	05/31/2016 13:51 EDT	Zerr, Lloyd	06/01/2016 06:51 EDT	
CFAM Review	Skipped		Zerr, Lloyd	06/01/2016 06:51 EDT	Zerr, Lloyd	06/01/2016 06:51 EDT	

Workbook Events						
Event	Status	Assigned to	Created by	Created on	Finished by	Finished on
Root Cause Sponsor	Skipped		Zerr, Lloyd	06/01/2016 06:51 EDT	Zerr, Lloyd	06/01/2016 06:51 EDT
QA Review	Skipped		Zerr, Lloyd	06/01/2016 06:51 EDT	Zerr, Lloyd	06/01/2016 06:51 EDT
CARB Review	Skipped		Zerr, Lloyd	06/01/2016 06:51 EDT	Zerr, Lloyd	06/01/2016 06:51 EDT
VP Review	Skipped		Zerr, Lloyd	06/01/2016 06:51 EDT	Zerr, Lloyd	06/01/2016 06:51 EDT
Actions	Working	CR Holding Tank	Zerr, Lloyd	06/01/2016 06:51 EDT		
Attachments						
Attachment						
FW Message from KM 364e.pdf						
RP Department Brief 5-10-16 Complete.pdf						

From: [Spahr, Joseph J.](#)
To: [Zerr, Lloyd P.](#); [Lockwood, David H.](#)
Cc: [Elliott, Christopher M](#)
Subject: FW: Message from KM_364e
Date: Tuesday, May 17, 2016 1:46:22 PM
Attachments: [SPYC307-P16051710410.pdf](#)

Men:

There are several initials missing, due to shift work, short term medical, etc. I do have a sheet from Freeman initialed on a separate cover, if needed.

Let me know, thanks

From: Wigren, Tamara S.
Sent: Tuesday, May 17, 2016 11:43 AM
To: Spahr, Joseph J. <jjspahr@firstenergycorp.com>
Subject: FW: Message from KM_364e

From: PYC307-P@firstenergycorp.com [<mailto:PYC307-P@firstenergycorp.com>]
Sent: Tuesday, May 17, 2016 11:42 AM
To: Wigren, Tamara S. <tswigren@firstenergycorp.com>
Subject: Message from KM_364e

Radiation Protection Department Brief

Perry Power Plant – Radiation Protection

Date: 5/12/2016

Conduct of Radiation Protection (NOP-OP-4002) Moment

4.3.2 Notifications to the RPM

1. Notify the **RPM (or acting RPM)** of events that impact or have the potential to impact the Radiation Protection Section, or that involve company or contractor personnel working in the department.

2. **RP Supervisors** are responsible for notifying the RPM. During offhours, the on-shift RPT notifies the duty RPS who then notifies the RPM.

3. Notify the RPM **immediately** (face-to-face or by phone) of the following occurrences, or other occurrence of similar consequence:

- Potential or actual overexposure of an individual, including exceeding administrative limits
- Injured person in the RCA
- Failure to control access to a High Radiation Area, Locked High Radiation Area, or Very High Radiation Area
- Loss of radioactive material or unaccounted for sealed source
- Violation of Radiation Protection procedures or RWP
- Violation of FENOC procedure by RP Personnel
- Any RP personnel injury
- Transport of contaminated injured personnel offsite
- Any uncontrolled release or detection of radioactive material / contamination outside of the RCA
- Personnel with a positive indication of an intake
- Industrial Safety "near miss"
- Any forced power reduction >25% rated thermal power
- Personnel contamination event
- Any indication from the NRC or Quality Assurance personnel that a condition exists that might result in a Notice of Violation or a Significant Condition Adverse to Quality
- Valid (response to occupational radiation exposure) EAD accumulated dose alarm
- Spill or leak that results in a large area (>500 sq feet) contamination

Technical Specification RPM

Perry Nuclear Power Plant UFSAR Excerpt:

The **Manager, Radiation Protection** Section is designated as the Radiation Protection Manager defined in <Regulatory Guide 1.8>. He is responsible for directing all activities associated with radiation protection and other radiological control services required to support plant operation and maintenance activities. This includes all radiation protection activities and for conducting the plant radiological survey activities required to ensure that personnel exposure to radiation and radioactive materials is maintained within the regulatory guidelines and that such exposure is kept as low as reasonably achievable (ALARA). If the Manager, Radiation Protection Section, **does not meet** the qualifications specified in <Regulatory Guide 1.8>, a qualified individual shall be designated as the **technical specification qualified Radiation Protection Manager**, who shall be responsible, including reviewing, approving and signing/countersigning all associated documents. The Manager, Radiation Protection Section reports to the General Plant Manager.

Manager, Radiation Protection – Chris Elliott
Technical Specification RPM – Joseph Spahr

In addition Technical Specification 5.2.1 States;

The individuals who train the operating staff, **carry out radiation protection duties**, or perform quality assurance functions **may** report to the appropriate onsite manager: **however**, these individuals shall have **sufficient organizational freedom** to ensure their independence from operating pressures.

This information does not change how we are doing business presently, it is being provided to reinforce and clearly align the team on reporting requirements and whom the communications should be made to. As noted in NOP-OP-4002, the RPM is required to be notified for various situations. Additionally, RPM approval is required for many processes that we are a part of. In any matter requiring RPM Approval or Notification, Joe Spahr or designee should be notified. This should be done by the normal chain of command such as delineated in NOP-OP-4002. Organizational Freedom is assured to all individuals carrying out radiation protection duties as noted in T.S. 5.2.1. Thus free flow of information, issues, or radiological challenges can be communicated directly to the General Plant Manager and/or Site Vice Present. At any time, any individual has the right to take information to the highest levels of the organization, or outside the organization if they feel it necessary.

Example:

Emergent LHRA Request Approval → RPT notifies Duty Supervisor → Duty Supervisor notifies and obtains approval from T.S. RPM → T.S. RPM notifies Manager, Radiation Protection

Initials Required									
Radiation Protection Personnel									
Rad Ops					Rad Staff				
Ainsley, B <i>BA</i>	Chapin, F <i>FC</i>	Hanlon, E <i>EH</i>	Mettler, T <i>TM</i>	Schwegler, S	Bartone, L <i>LB</i>	Lynch, J <i>JB</i>			
Anderson, J <i>JA</i>	Crawford, A <i>AC</i>	Harris, C <i>CH</i>	Miller, J <i>JM</i>	Tiemo, C	Bump, C <i>CB</i>	Schult, D <i>DS</i>			
Andrei, M <i>MA</i>	Daley, J	Johnston, C <i>CJ</i>	Monroe, T <i>TM</i>	Trent, S <i>TS</i>	Freeman, K	Spahr, J <i>JS</i>			
Augustyniak, G <i>GA</i>	Donaldson, JR <i>JR</i>	Jones, C <i>CB</i>	Pantojas, A <i>AP</i>	Warner, A <i>AW</i>	Lee, S <i>SL</i>	Taylor, M <i>MT</i>			
Barnes, R <i>RB</i>	Dumas, S <i>SD</i>	King, J <i>JK</i>	Rabenold, A <i>AR</i>	Wilson, J	Long, J <i>JB</i>	Wigren, T <i>TW</i>			
Brown, G	Durham, C <i>CD</i>	Lovsin, B <i>BL</i>	Rhoades, T <i>TR</i>						
Cervantes, J <i>JC</i>	Glass, B <i>GB</i>	Magda, D <i>MD</i>	Rossmann, N <i>NR</i>						
Chaffee, R <i>RC</i>	Glass, F <i>GF</i>	McLaughlin, D							

Approved: Chris Elliott *CE*

CR - Corrective Actions

Header

CA Identifier	Site	CR Category	Workflow State	Originator	Due Date	Needs CARB Review
CA-2016-06326-001	G202	AF	Respond	Lockwood, David H.	07/28/2016	

CAUTION - This CA is linked to

Schedule Type	Corrective Action Type	Notification / WO #	Work Center
A - Owner Assigned/Controlled	CA - Corrective Action		PY-PI-REGC; PY-Regulatory Compliance

Accepting Individual

Conicella, Nicola F; PY-PI-REGC; PY-Regulatory Compliance; Manager

Description

Reg. Compliance will review NOP-SS-4002, Personnel Selection, Qualifications and Employment Verification, and submit a DCR identifying required revisions to address lessons learned for similar circumstances involving personnel selections in the future.

Current Assignee	Response Type
Lockwood, David	

Response

Required Approval Level	Outage Number
N/A	

Workbook Events

Event	Status	Assigned to	Created by	Created on	Finished by	Finished on
Initiate	Completed	Lockwood, David	Lockwood, David	05/31/2016 13:39 EDT	Lockwood, David	05/31/2016 13:39 EDT
Accept/Assign	Completed	Conicella, Nicola	Lockwood, David	05/31/2016 13:39 EDT	Zerr, Lloyd	06/01/2016 06:47 EDT
Director Acceptance	Skipped		Zerr, Lloyd	06/01/2016 06:47 EDT	Zerr, Lloyd	06/01/2016 06:47 EDT
Respond	Working	Lockwood, David	Zerr, Lloyd	06/01/2016 06:47 EDT		

CR - Corrective Actions

Header

CA Identifier	Site	CR Category	Workflow State	Originator	Due Date	Needs CARB Review
CA-2016-06326-002	G202	AF	Closure Review	Lockwood, David H.	07/28/2016	

CAUTION - This CA is linked to

Schedule Type	Corrective Action Type	Notification / WO #	Work Center
A - Owner Assigned/Controlled	CA - Corrective Action		PY-PI-REGC; PY-Regulatory Compliance

Accepting Individual

Conicella, Nicola F; PY-PI-REGC; PY-Regulatory Compliance; Manager

Description

Reg. Compliance will complete a new USAR change notice to revise USAR Change Notice 15-165 to clarify responsibilities and organizational reporting authority for the section manager and the Technical Specification designated RPM. RC will work with Fleet Licensing to process the USAR change (CN 16-085).

Response Type

Completed as Written

Response

USAR Change Notice 16-085 was approved on June 8, 2016 and is available for viewing in FileNet.

Required Approval Level	Outage Number
N/A	

Review

Review Level	Review Results	Additional Review	Approved w/ Comments	Date	Comments
Approval	Approved			06/09/2016	
Closure Review					

Workbook Events

Event	Status	Assigned to	Created by	Created on	Finished by	Finished on
Initiate	Completed	Lockwood, David	Lockwood, David	05/31/2016 13:47 EDT	Lockwood, David	05/31/2016 13:47 EDT
Accept/Assign	Completed	Conicella, Nicola	Lockwood, David	05/31/2016 13:47 EDT	Zerr, Lloyd	06/01/2016 06:50 EDT
Director Acceptance	Skipped		Zerr, Lloyd	06/01/2016 06:50 EDT	Zerr, Lloyd	06/01/2016 06:50 EDT
Respond	Completed	Lockwood, David	Zerr, Lloyd	06/01/2016 06:50 EDT	Lockwood, David	06/09/2016 10:42 EDT
Initial CARB Review	Skipped		Lockwood, David	06/09/2016 10:42 EDT	Lockwood, David	06/09/2016 10:42 EDT
RC Verify	Skipped		Lockwood, David	06/09/2016 10:42 EDT	Lockwood, David	06/09/2016 10:42 EDT
Approval	Completed	Zerr, Lloyd	Lockwood, David	06/09/2016 10:42 EDT	Zerr, Lloyd	06/09/2016 11:12 EDT
QA Review	Skipped		Zerr, Lloyd	06/09/2016 11:12 EDT	Zerr, Lloyd	06/09/2016 11:12 EDT
CARB Review	Skipped		Zerr, Lloyd	06/09/2016 11:12 EDT	Zerr, Lloyd	06/09/2016 11:12 EDT
Closure Review	Working	CR CRPA Team - G202	Zerr, Lloyd	06/09/2016 11:12 EDT		

CR - Corrective Actions

Header

CA Identifier	Site	CR Category	Workflow State	Originator	Due Date	Needs CARB Review
CA-2016-06326-003	G202	AF	Respond	Lockwood, David H.	08/30/2016	

CAUTION - This CA is linked to

Schedule Type	Corrective Action Type	Notification / WO #	Work Center
A - Owner Assigned/Controlled	CA - Corrective Action		PY-PI-REGC; PY-Regulatory Compliance

Accepting Individual

Zerr, Lloyd P.; PY-PI-REGC-CO; PY-Compliance; Supervisor

Description

Regulatory Compliance will review applicable documentation, including the QAPM, determine if changes are required to organization charts or job descriptions for the Manager Radiation Protection Sections and the Technical Specification RPM and effect any required changes.

Current Assignee	Response Type
Zerr, Lloyd	

Response

Required Approval Level	Outage Number
N/A	

Workbook Events

Event	Status	Assigned to	Created by	Created on	Finished by	Finished on
Initiate	Completed	Lockwood, David	Lockwood, David	06/09/2016 11:13 EDT	Lockwood, David	06/09/2016 11:13 EDT
Accept/Assign	Completed	Zerr, Lloyd	Lockwood, David	06/09/2016 11:13 EDT	Zerr, Lloyd	06/09/2016 11:34 EDT
Director Acceptance	Skipped		Zerr, Lloyd	06/09/2016 11:34 EDT	Zerr, Lloyd	06/09/2016 11:34 EDT
Respond	Working	Zerr, Lloyd	Zerr, Lloyd	06/09/2016 11:34 EDT		