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March 12, 1990
PERRY NUCLEAR POWER PLANT
PY-CEI/NRR-1122 L

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

Perry Nuclear Power Plant
Docket No. 50-440
Response to NRC Staff RAI on
PNPP Technical Specification
Change Request Pursuant to G.L. 87-09

Gentlemen:

The Cleveland Electric Illuminating Company (CEI) is responding by this letter to an NRC staff written request for additional information (RAI) dated July 12, 1989 regarding CEI's Technical Specification Change Request pursuant to Generic Letter 87-09 for the Perry Nuclear Power Plant (PNPP) submitted September 17, 1987 via letter PY-CEI/NRR-0720L.

The NRC staff has requested that:

- (1) For each proposed Technical Specification (TS) related to Generic Letter 87-09, CEI affirm that remedial measures prescribed for the affected Action Statements are consistent with PNPP's Updated Safety Analysis Report (USAR) and its supporting safety analyses, and,
- (2) CEI identify and affirm those administrative controls (e.g., maintenance program provisions, plant operating procedures, management directives, on-site safety reviews, etc.), that have been established to limit the use of the proposed TS 3.0.4 exceptions. This affirmation should address training necessary for ensuring that plant operators are made aware of and are properly instructed in exercising these administrative controls to limit the use of the proposed Technical Specification 3.0.4 exception.

In response to the NRC staff request for additional information, and on the basis of the discussion in Attachment 1 to this letter, I hereby affirm, that for each Technical Specification that will be affected by the proposed amendment to Technical Specification 3.0.4, the Action Statement for that Technical Specification will provide an adequate level of protection for the startup, shutdown and extended operation of PNPP. In addition, I hereby affirm that the administrative controls that are now in effect combined with those that will be implemented upon NRC approval of PNPP's Technical Specification Change Request pursuant to GL 87-09 will limit the use of the TS 3.0.4 exceptions and that plant operators will be made aware of and instructed to exercise the administrative controls promulgated to limit the use of such exceptions.

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It is requested that this amendment be made effective as of the date of issuance by the NRC. However, due to the training of appropriate personnel that will be required following NRC issuance and prior to implementation, this change shall be implemented by CEI not later than 45 days after issuance.

If you have any questions, please feel free to call.

Very truly yours,



Al Kaplan
Vice President
Nuclear Group

AK:njc

Attachment

cc: T. Colburn
P. Hiland
NRC, Region III

The NRC staff stated in its July 12, 1989 RAI that the basis for accepting Standard Technical Specification 3.0.4-related amendments submitted in response to Generic Letter 87-09 is predicated upon two assumptions, namely: (1) that the remedial measures prescribed by the Technical Specification ACTION STATEMENTS for which an exception will be granted provide a sufficient level of protection to permit operational mode changes and safe long-term operation consistent with the licensing basis described in the plant's Updated Safety Analysis Report; and (2) that it will be the exception rather than the rule that plant startup may commence with important safety features inoperable.

NRC Request #1

In order for the NRC staff to conclude that the safety basis relative to the above stated assumptions is satisfied, we request that for each proposed Technical Specification exception related to GL 87-09, you affirm that remedial measures prescribed for the affected ACTION STATEMENTS are consistent with the Updated Safety Analysis Report and its supporting safety analysis.

CEI Response

The NRC staff explains in the RAI that the affirmation is necessary to confirm the assumption that the remedial measures prescribed by the Technical Specification ACTION STATEMENTS for which a TS 3.0.4 exception will be granted provide a sufficient level of protection to permit operational mode changes and safe long-term operation consistent with the licensing basis described in PNPP's Updated Safety Analysis Report. CEI understands, therefore, that the affirmation requested should confirm that for each TS that will be affected by the proposed amendment to TS 3.0.4, the action statement for that TS will provide, consistent with the requirements of the Atomic Energy Act, an adequate level of protection for the startup, shutdown, and extended operation of the plant. However, we interpret the RAI not to require that the affirmation confirm those action statements literally are the same as the safety analyses in the Updated Safety Analysis Report. Those analyses were prepared to support the limiting conditions for operation in the plant TS, which ensure that the operation of the plant will provide the level of protection that is documented in the USAR. They were not prepared specifically and directly to support the action statements, which, it is recognized and understood by both licensees and the NRC, address a threshold change in available equipment for operation of the plant but which also ensure an adequate level of safety.

CEI has reviewed the action statements for the PNPP Technical Specifications to ensure that the requested amendment has been considered on a plant-specific basis for PNPP, and has concluded that nineteen (19) PNPP Technical Specifications will be affected by the proposed amendment to TS 3.0.4. As noted above, this review does confirm that each action statement will provide an adequate level of protection for the startup, shutdown and extended operation of the plant. Specifically, with respect to each TS, the review (i) identified the safety function(s) involved; (ii) determined the impact of the

proposed amendment on the safety function or functions involved; and (iii) demonstrated the acceptability of the proposed amendment because it confirmed that the action statements will provide an adequate level of protection and identified any additional restrictions or controls necessary to achieve that acceptability.

On the basis of this review the CEI Vice President, Nuclear Group, has affirmed in this submittal, in response to the NRC Staff RAI, that for each TS that will be affected by the proposed amendment to TS 3.0.4, the action statement for that TS provides an adequate level of protection for the startup, shutdown and extended operation of PNPP.

NRC Request #2

In addition, we request that you identify and affirm those administrative controls (e.g., maintenance program provisions, plant operating procedures, management directives, onsite safety reviews, etc.) that have been established to limit the use of the proposed Technical Specification 3.0.4 exceptions. Your affirmation should address training necessary for ensuring that plant operators are made aware of and are properly instructed in exercising these administrative controls to limit the use of Technical Specification 3.0.4 exception.

CEI Response

Generic Letter (GL) 87-09 states that "nothing in this staff position should be interpreted as endorsing or encouraging a plant startup with inoperable equipment," and that "plant startup should normally be initiated only when all required equipment is operable and that startup with inoperable equipment must be the exception rather than the rule". Current PNPP practices and procedures are designed to minimize plant operation with safety-related equipment inoperable and to ensure awareness of Limiting Condition for Operation (LCO) status. The following is a summary of administrative controls currently in effect to ensure that entry into an LCO action statement is tracked and that maintenance to correct equipment problems causing this entry is given an appropriate priority:

OAP-0103, Shift Relief and Turnover, requires both the Operations Shift Supervisor (SS) and Control Room Unit Supervisor (US) to review all Active and Potential LCOs at time of Shift Turnover to assure proper response has been initiated, compliance with the Technical Specifications has been achieved, and the proper reports have been initiated or completed. In addition, the following information is included in the Shift turnover checklist for review: (1) equipment deficiencies and the status of follow-up investigations, if applicable, (2) measures required as a result of out-of-service equipment, and (3) restoration measures outstanding due to completed maintenance or tests.

OAP-1701, Tracking of LCOs, implements a method of tracking Active and Potential LCOs to ensure TS compliance for the plant's present Operational Condition and to anticipate Potential LCOs which would become applicable due to changes in Operational Conditions. The Control Room Unit Supervisor is responsible for review of all active and potential LCO tracking sheets prior to a planned Operational Condition change or entry/exit from a plant condition identified in Technical Specification Applicability. OAP-1701 ensures that LCOs are tracked to ensure Technical Specification compliance prior to entry into higher modes of operation. Even after approval of this change to TS 3.0.4, LCO's will still be written and tracked for the associated equipment if it becomes inoperable, and maintenance work priority for this equipment will remain unchanged.

IOI-001, Cold Startup, IOI-002, Hot Startup and IOI-009, Refueling, require the completion of applicable "Operational Condition Change Checklists", and IOI-001 and IOI-002 require review of a "Potential LCO Tracking Log", to ensure that LCOs are resolved prior to entering higher modes of operation. IOI-001 and IOI-002 require review of all plant systems prior to startup to verify correct lineup and to ensure availability of all plant systems. Prior to startup, exceptions to plant/system availability are noted and reviewed by the Unit Supervisor and approved by the Shift Supervisor.

PAP-0205, Operability of Plant Systems, currently allows removal of Technical Specification systems or components from service only when plant safety is ensured and upon the concurrence of the Shift Supervisor. Prior to granting permission for removal of systems from service the US/SS reviews the following: (1) the operability of redundant systems, (2) compliance with OAP-1701, Tracking of LCOs, (3) operating restrictions caused by removal from service, (4) alternate ECCS flow path and decay heat removal path (if required), (5) impact on shutdown margin, (6) system operations required to allow the work to be performed, (7) safety considerations, and (8) impact on unit generating capabilities. This review also ensures that LCOs are identified in the Technical Specifications and determines the impact upon continued plant operations.

PAP-0902, Work Request System, requires a review by the Control Room Unit Supervisor of all work requested on plant systems, equipment or components. The US is responsible for determining if the problem identified or work requested causes an active or potential LCO, determining if a Work Order is required, and assigning the work priority based on urgency, releasing organization, scope, and scheduling.

Under PNPP's maintenance priority system, Technical Specification equipment receives high priority because of the importance of this equipment to plant safety notwithstanding existing 3.0.4 exceptions. It is PNPP's goal that all Technical Specification equipment be operable prior to startup, and this goal is a primary consideration in establishing work priority. This philosophy will not change following approval of the GL 87-09 changes. To ensure that plant startup will normally be initiated only when all Technical Specification

equipment is operable, Technical Specification equipment will continue to receive high priority regardless of any added flexibility provided by the GL 87-09 changes to TS 3.0.4.

In addition, the following controls will be implemented upon NRC approval of the proposed GL 87-09 changes to TS 3.0.4:

1. A management directive will be provided by letter from CEI's Vice President, Nuclear Group, to PNPP's Plant Manager, Operations Manager and Operations Superintendent to the effect that (1) the GL 87-09 changes to TS 3.0.4 and related Technical Specifications should not be interpreted as endorsing or encouraging plant startup with inoperable equipment, (2) good practice dictates that plant startup should be initiated only when all required equipment is operable, and (3) startup with inoperable equipment must be the exception rather than the rule.
2. All operators will receive training to the GL 87-09 TS 3.0.4 related changes to PNPP's Technical Specifications as part of their normal operator training. Operations Unit Supervisors and Control Room Shift Supervisors, the primary personnel responsible for making the TS 3.0.4 determination of whether to allow plant startup with Technical Specification equipment inoperable, will receive specific training on CEI policy reflected in the management directive described above prior to implementation of the TS 3.0.4 changes. For Shift Supervisors, this training will be periodic.
3. A policy statement will be provided in Plant Administrative Procedure, PAP-0205, Operability of Plant Systems, to the effect that LCOs will be tracked with the purpose of clearing them prior to startup whether or not startup is prohibited per TS 3.0.4.
4. Those instances in which the conditions for an LCO are not met and entry into an operational mode or other specified conditions of operation is made in accordance with TS 3.0.4 as revised shall be documented, reviewed by the Unit Supervisor, and approved by the Shift Supervisor, as part of the startup checklist of IOI-001, Cold Startup, IOI-002, Hot Startup and IOI-009, Refueling. This review shall be performed with the purpose of clearing the LCOs prior to startup, where practicable.
5. Future audits of PNPP Technical Specification activities conducted by PNPP's Nuclear Quality Assurance Department in accordance with TS 3.5.2.8 will include an assessment of PNPP conformance to TS 3.0.4 policy as expressed in the revised bases for TS 3.0.4 and in the management directive described above. Reference TS 6.5.2.8.k.