



**CENTERIOR
ENERGY**

PERRY NUCLEAR POWER PLANT

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February 26, 1993
PY-CEI/NRR-1606 L

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

Perry Nuclear Power Plant
Docket No. 50-440
Technical Specification
Change Request: Section 6.3.1,
"Unit Staff Qualifications"

Gentlemen:

In accordance with the requirements of 10CFR50.90, the Cleveland Electric Illuminating Company (CEI) and Centerior Service Company hereby submit an application for amendment of Appendix A (Technical Specifications) to Facility Operating License NPF-58 for the Perry Nuclear Power Plant (PNPP) Unit 1.

The proposed change requests temporary relief from the requirements of Administrative Controls Technical Specification Section 6.3.1, "Unit Staff Qualifications," to permit a specific individual (Mr. Mark B. Bezilla) to assume the active duties of Manager, Perry Operations Section, within the Perry Nuclear Power Plant Department (PNPPD), without currently holding a Senior Reactor Operator (SRO) license on PNPP Unit 1. The temporary relief is requested for a limited period of time during which the SRO license qualification requirement will be met. This change is similar to that requested by CEI in letter PY-CEI/NRR-0431L dated January 29, 1986 and approved by the NRC for PNPP Unit 1 low power and initial full power Technical Specifications.

The Technical Specification Change Request is provided in Attachment 1. The Significant Hazards Consideration for the Technical Specification Change Request is provided in Attachment 2. A copy of the marked up Technical Specification page is provided in Attachment 3.

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Operating Companies
Cleveland Electric Illuminating
Toledo Edison

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

Sincerely,



Robert A. Stratman

RAS:CJF:ss

Attachments

cc: NRC Project Manager
NRC Resident Inspector Office
NRC Region III
State of Ohio

License Amendment Application For Facility Operating License NPF-58
For The Perry Nuclear Power Plant (PNPP) Unit 1
(TECHNICAL SPECIFICATION CHANGE REQUEST: UNIT STAFF QUALIFICATIONS)

I. SUMMARY

The purpose of this Technical Specification Change Request (TSCR) is to obtain temporary relief from the requirements for "Unit Staff Qualifications" contained in Administrative Controls Section 6.3.1 of PNPP's Unit 1 Technical Specifications to permit a specific individual to assume the active duties of Manager, Perry Operations Section of the Perry Nuclear Power Plant Department (PNPPD) without holding a current SRO license on PNPP Unit 1. This change is necessary to support the above appointment since the proposed candidate has not yet completed the training required for examination by the NRC for a Senior Reactor Operator (SRO) license on PNPP Unit 1.

II. DESCRIPTION OF PROPOSED CHANGE

Technical Specification Section 6.3.1, "Unit Staff Qualifications" currently requires each member of the unit staff to meet or exceed the minimum qualifications of ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," for comparable positions. The Perry Nuclear Power Plant (PNPP) Unit 1, Updated Safety Analysis Report (USAR), Table 13.1-1, identifies that the ANSI N18.1-1971 position of Operations Manager is equivalent to the position of Manager, Perry Operations Section. The qualification requirements for the position of Operations Manager are listed in Section 4.2.2 of ANSI N18.1-1971. Among the requirements listed is the requirement that, at the time of appointment to the active position, the Operations Manager shall hold a Senior Reactor Operator's License. This License Amendment Application requests a change to Technical Specification Section 6.3.1 to obtain temporary relief from the above ANSI N18.1-1971 requirement to permit an otherwise qualified individual to assume the active duties of Manager, Perry Operations Section, without currently holding an SRO license on PNPP Unit 1. This relief is requested for a period of approximately 30 months, the time period required for the SRO license requirement to be satisfied based on PNPP's next scheduled SRO/RO training and examination cycle (August 1995 examination schedule). This change is similar to that requested by CEI in letter PY-CEI/NRR-0431L dated January 29, 1986 and approved by the NRC for PNPP's Unit 1 low power and initial full power Technical Specifications. A copy of the marked up Technical Specification is provided in Attachment 3.

III. REASON FOR PROPOSED CHANGE

Effective on December 18, 1992, Mr. Michael D. Lyster resigned from his Vice President, Nuclear-Perry position with the Centerior Service Company. Due to the departure of Mr. Lyster, we found it desirable to realign certain of our personnel to most effectively utilize the many available talents within the PNPP unit staff organization. The organizational changes affecting Operations Management positions involve the unit staff positions of (1) Vice President, Nuclear-Perry;

(2) General Manager, Perry Nuclear Power Plant Department (PNPPD); and
(3) Manager, Perry Operations Section (reference PNPP Unit 1 USAR Table 13.1-1 for a description of PNPP unit staff titles and ANSI N18.1-1971 equivalents).

The following discussion describes the changes occurring within our Operations Management positions. On December 18, 1992, Mr. Robert A. Stratman formally succeeded Mr. Lyster as Centerior Service Company's new Vice President, Nuclear-Perry. Mr. Stratman had previously held the PNPP unit staff position of General Manager, Perry Nuclear Power Plant Department. Also effective on December 18, 1992 was the reassignment of Mr. David P. Igyarto from the position of Manager, Perry Training Section, to fill the vacated position of General Manager, PNPPD. To round out the reorganization of PNPP's operations management staff, we have proposed a new appointment to the position of Manager, Perry Operations Section. The proposed candidate currently holds the position of Superintendent, Operations at the Davis-Besse Nuclear Power Station (DBNPS) for the Toledo Edison Company (TECo) (the Cleveland Electric Illuminating Company, Centerior Service Company and TECo are all subsidiaries of the Centerior Energy Corporation). We consider all of the above appointments critical with respect to future successful plant operation and we believe these changes best utilize the technical and managerial talents within our organization.

It continues to be our commitment to have the PNPP unit staff meet or exceed the qualification requirements of ANSI N18.1-1971 and we recognize that with this reorganization, the qualifications of the position of Operations Manager per ANSI N18.1-1971 are not fully met by our candidate for Manager, Perry Operations Section, with respect to the requirement for holding a Senior Reactor Operator License on PNPP Unit 1. We believe, however, that this operations organization provides the depth and strength of both management and operating experience to support continued safe plant operations. We are therefore requesting approval of a change to Technical Specification 6.3.1 to provide temporary relief from the ANSI N18.1-1971 SRO license qualification requirement for the interim time period until this requirement can be met.

IV. JUSTIFICATION FOR PROPOSED CHANGE

The conduct of operations at PNPP Unit 1 consists of the following management hierarchy with equivalent ANSI N18.1-1971 positions in parentheses: General Manager, PNPPD (Plant Manager); Manager, Perry Operations Section (Operations Manager); Superintendent, Plant Operations (Operations Manager); Shift Supervisor (Supervisors Requiring NRC License); and Unit Supervisor (Supervisors Requiring NRC License). The Superintendent, Plant Operations, Shift Supervisor and Unit Supervisor all hold current SRO licenses on PNPP Unit 1. In addition, the position of Superintendent, Plant Operations, satisfies all the ANSI N18.1-1971 qualification requirements for the position of Operations Manager (including the SRO license requirement), reports directly to the Manager,

Perry Operations Section, provides direct supervision of the Shift Supervisors and is available to assist the Manager, Perry Operations Section, on an as-needed basis.

The expertise our candidate brings into the position of Manager, Perry Operations Section, more than compensates for his lack of a Senior Reactor Operator license on the Perry Plant. Our candidate has held a Senior Reactor Operator license on the Davis-Besse Nuclear Power Station, a pressurized water reactor (PWR), for the Toledo Edison Company from 1989 until the present appointment with the Cleveland Electric Illuminating Company (CEI). He has also held a Senior Reactor Operator license from 1986 to 1987 and a Reactor Operator license from 1983 to 1986 on the Three Mile Island Unit 1 Nuclear Power Station, another PWR, while employed for Metropolitan Edison Company and GPU Nuclear.

Our candidate brings over 17 years of commercial nuclear power plant experience to the position of Manager, Perry Operations Section. With the Toledo Edison Company at the Davis-Besse facility, he has held the position of Superintendent, Plant Operations since 1989 and Shift Supervisor from 1987 to 1989. As Superintendent, Plant Operations, he was responsible for the Supervision of the Davis-Besse plant operations staff to ensure compliance with station procedures and regulatory requirements, and for coordination of activities between the operating shifts and other plant departments. As Shift Supervisor, he was responsible for supervising shift operations and directing major evolutions that affected plant operations, among other duties.

In previous positions at Three Mile Island, Unit 1, our candidate held positions of Operations Shift Foreman, Control Room Operator and Senior Project Coordinator. He also holds a Bachelor of Science degree in Nuclear Engineering Technology from T. A. Edison State College (NJ). In summary, our candidate far surpasses the minimum education and power plant experience, including nuclear power plant experience, required by ANSI N18.1-1971 for the equivalent position of Operations Manager. In addition, he will be included within the next scheduled Senior Reactor Operator/Reactor Operator training and examination program currently scheduled to begin in June 1994 and will sit for the next scheduled SRO license examination currently scheduled for August 1995. We will also ensure that our candidate receives PNPP specific Boiling Water Reactor (BWR) technology training as soon as practicable following appointment to the position.

With this appointment, our operations lineup offers considerable strength and flexibility. While the ANSI N18.1-1971 SRO qualification requirements for Operations Manager will not be fully met at present with respect to the position of Manager, Perry Operation Section, we believe the depth of this organization is more than adequate to continue to effectively and safely operate PNPP Unit 1.

V. SIGNIFICANT HAZARDS CONSIDERATION

Refer to Attachment 2.

VI. ENVIRONMENTAL CONSIDERATION

The proposed Technical Specification change request has been reviewed against the criteria of 10 CFR 51.22 for environmental considerations. As shown above and in Attachment 2, the proposed change is purely administrative in nature in that the change is designed to allow an exception to a single unit staff qualification requirement contained in the Administrative Controls Section 6.3.1 of PNPP Unit 1 Technical Specifications for a single unit staff position on a case-specific basis for a limited period of time beyond which the qualification requirement will be met. The proposed change does not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Consequently, the proposed change has no significant effect on the human environment. Based on the foregoing, it has been concluded that the proposed Technical Specification change meets the criteria given in 10 CFR 51.22(c)(10) for a categorical exclusion from the requirement for an Environmental Impact Statement.

SIGNIFICANT HAZARDS CONSIDERATION

The standards used to arrive at a determination that a request for amendment involves no significant hazards considerations are included in the Commission's Regulations, 10CFR50.92, which state that the operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any previously evaluated, or (3) involve a significant reduction in a margin of safety.

The proposed amendment has been reviewed with respect to these three factors and it has been determined that the proposed change does not involve a significant hazard because:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed TS change is an administrative change consisting of an exception to a single unit staff qualification requirement for one unit staff position on a case specific basis for a limited period of time beyond which the requirement will be met. The individual who is intended to succeed the current Manager, Perry Operations Section, has held an SRO license at two other generating units and satisfies all other ANSI N18.1-1971 qualification requirements for the equivalent position. Therefore, the change does not result in a significant reduction in overall unit staff qualifications or expertise.

The ANSI N18.1-1971 qualification requirements for all other unit staff management positions continue to be met. The proposed change will have no significant adverse impact on accident probability or consequences. Therefore, the proposed TS change does not increase the probability or consequences of an accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed TS change is an administrative change to allow an exception to a single staff qualification requirement for a single unit staff position on a case-specific basis for a limited period of time beyond which the qualification requirement will be met. The lack of a current PNPP Unit 1 SRO license on the part of the Manager, Perry Operations Section, unlike a procedure or design change, is not a potential new accident precursor.

The ANSI N18.1-1971 qualification requirements for all other unit staff management positions remain unchanged. Additionally, the proposed TS Change does not affect plant design, hardware, system operation, or procedures. Therefore, the proposed TS change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment does not involve a significant reduction in the margin of safety.

The proposed TS change is an administrative change to allow an exception to a single unit staff qualification requirement contained in the Administrative Controls Section of PNPP Technical Specifications for a single unit staff position on a case-specific basis for a limited period of time beyond which the qualification requirement will be met. The candidate's education and previous experience adequately compensate for the present lack of an SRO license.

The ANSI N18.1-1971 qualification requirements for all other unit staff management positions continue to be met. The licensed operator qualifications and training programs will continue to comply with the requirements of 10 CFR 55 and ANSI N18.1-1971. The proposed change does not involve a relaxation in the criteria used to establish safety limits, nor does it involve a change in the bases for limited safety system settings or limiting conditions for operations. Therefore, the proposed TS change does not reduce the margin of safety.