

PERRY NUCLEAR POWER PLANT

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Robert A. Stratman
VICE PRESIDENT - NUCLEAR

August 12, 1994
PY-CEI/NRR-1844 L

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

Perry Nuclear Power Plant
Docket No. 50-440
Services Section Reporting Point Change
and Request for NRC Review and Approval

Gentlemen:

As part of a proposed organizational change for the Perry Nuclear Power Plant, the Plant Services Section will be renamed the Quality Services Section, and the Manager will report to the Director, Perry Nuclear Assurance Department. The Manager, Plant Services Section currently reports to the Director, Perry Nuclear Services Department. Attachment 1 provides Updated Safety Analysis Report pages marked to reflect this specific part of the organization change.

The entire proposed organizational change has been reviewed in accordance with 10 CFR 50.54(a)(3), 50.54(p), 50.54(q) and 50.59. The relocation of the Services Section described above was determined to be a reduction in commitment in the quality assurance program as described in the Updated Safety Analysis Report, in that administrative duties not related to quality assurance or the Independent Safety Engineering Group will be assumed by the Director, Perry Nuclear Assurance Department. This aspect of the organization change therefore requires prior NRC approval. The proposed organization will continue to satisfy the criteria of 10 CFR 50 Appendix B, as described in Attachment 2. In accordance with 10 CFR 50.54(a)(3), the relocation of the Services Section will be regarded as accepted upon receipt of an NRC letter to this effect, or 60 days from the date of this submittal, whichever occurs first.

If you have questions or require additional information, please contact Mr. James D. Kloosterman, Manager - Regulatory Affairs at (216) 280-5833.

170029

Sincerely,

RAS:BSF:sc

Attachments

cc: NRC Project Manager
NRC Resident Inspector Office
NRC Region III

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

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ATTACHMENT 1

TO LETTER PY-CEI/NRR-1844 L

[The Updated Safety Analysis Report (USAR) pages which are attached reflect only the specific change of Plant Services Section to Quality Services Section; they do not reflect the other organizational changes being made at the Perry Nuclear Power Plant, since reductions in commitment in the QA program description are not involved with those changes. In accordance with 10 CFR 50.71(e), revised pages reflecting the entire organization change will be submitted as part of the periodic update of the USAR.]

No changes to this page,
included for continuity
purposes.

13.1.2.2.3 Perry Nuclear Services Department

Director, Perry Nuclear Services Department

The Director, Perry Nuclear Services Department (PNSD) has overall responsibility for the plant security, training, and licensing and compliance activities in support of the operation of Perry. The Director, PNSD is responsible for implementation of the Perry Physical

Security Plan. Additionally, this director has the overall responsibility for material services, ~~providing general and procedural administrative services, document control, records management, and~~ emergency planning functions. This director is also responsible for compliance with the plant operating license, regulations, and the Operational Quality Assurance Program. The Director, PNSD reports to the Vice President, Nuclear - Perry.

Manager, Perry Training Section

The Manager, Perry Training Section is responsible for developing a Perry Training Program based on the input and direction of the Perry departments. This manager is also responsible for overall maintenance and operation of the control room simulator, selecting and certifying instructors, scheduling training activities and maintaining documentation of training completed. The Manager, Perry Training Section reports to the Director, PNSD.

Manager, Site Protection Section

The Manager, Site Protection Section is responsible for directing all activities required to develop and maintain a qualified security force and for ensuring that all provisions of the Perry Physical Security Plan are implemented. In addition, this manager is responsible for access authorization, coordination of fire protection activities, and training of security and fire protection personnel. This manager reports to the Director, PNSD.

Manager, Regulatory Affairs Section

The Manager, Regulatory Affairs Section is responsible for general nuclear licensing support; including USAR, Technical Specification and Operating License maintenance. This manager is the primary liaison with the NRC's Office of Nuclear Reactor Regulation (NRR) Washington, D. C., and Region III, Chicago, Illinois for all project information. This manager provides review of NRC, Institute of Nuclear Power Operations (INPO) and internally generated documents which could result in plant changes and/or license commitments. Additionally, this manager is responsible for regulatory compliance which includes the preparation of Licensee Event Reports (LERs). This manager is also responsible for coordinating all efforts toward developing and maintaining offsite and onsite emergency response plans for Perry's Emergency Planning Zone. The Manager, Regulatory Affairs Section reports to the Director, PNSD.

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to page
17.2-14

Quality

Manager, ~~Plant~~ Services Section

Quality

The Manager, ~~Plant~~ Services Section is responsible for ~~reviewing and~~ implementing the Perry procedure instruction program, performing document and ~~providing for major project program improvements, providing the~~ drawing control activities, providing permanent storage for and ~~necessary administrative services required to effectively support plant~~ retrieval of construction and operations records, and for furnishing administrative services in support of plant activities. The Manager, Quality Services Section reports to the Director, PNAD.

13.1-19

Revision 6
March, 1994

~~activities, the control and distribution of the Perry procedures and instructions, the Operations QA Plan, and quality documents control and processing. The Manager is also responsible for records management for construction and operations including controlling and maintaining quality assurance records turned over to the Section for processing and storage. The Manager, Plant Services Section, reports to the Director, PNSD.~~

Manager, Materials Management Section

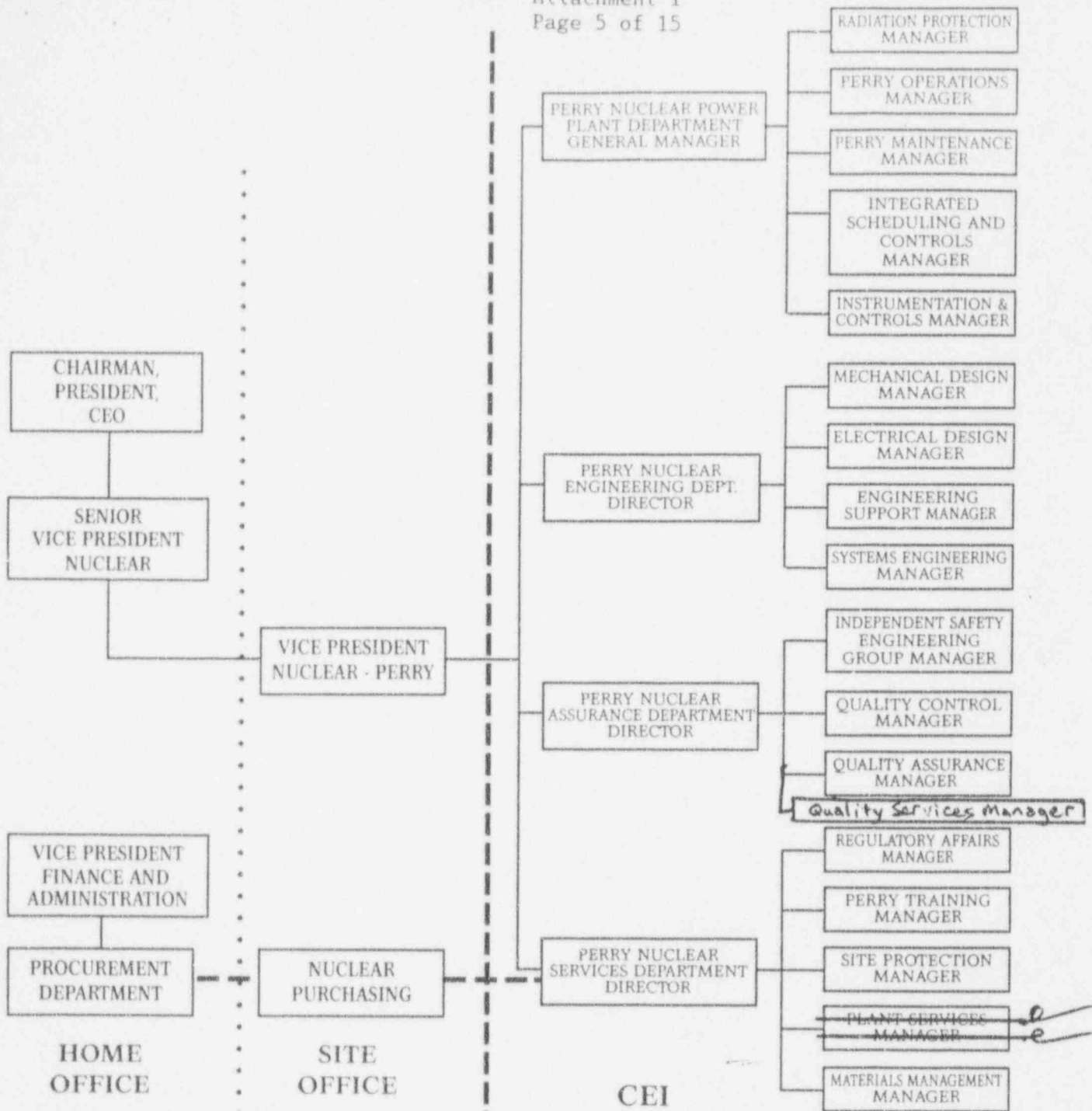
The Manager, Materials Management Section is responsible for planning for material requirements; maintaining and monitoring inventory levels; coordinating the procurement, receipt and issuance of materials; and coordinating storage to meet maintenance requirements. The Manager, Materials Management Section, reports to the Director PNSD.

13.1.2.2.4 Perry Nuclear Assurance Department (PNAD)

The Perry Nuclear Assurance Department has the functional authority, independence, and responsibility to verify the effective implementation of the administrative controls and the Quality Assurance Program during the Operational Phase of Perry. The Director, PNAD reports directly to the Vice President, Nuclear - Perry. This reporting relationship has been established to provide PNAD with sufficient independence from the influence of cost and schedule to be able to effectively assure conformance to Operational Quality Assurance Program requirements. The Director, PNAD, has the overall authority and responsibility for the Quality Assurance Program for Perry. Refer to Section 17.2.1.3.2.2 for additional information regarding the Perry Nuclear Assurance Department.

13.1.2.2.5 Deleted

The Director, PNAD also has the overall responsibility for providing general and procedural administrative services, document control, and records management.



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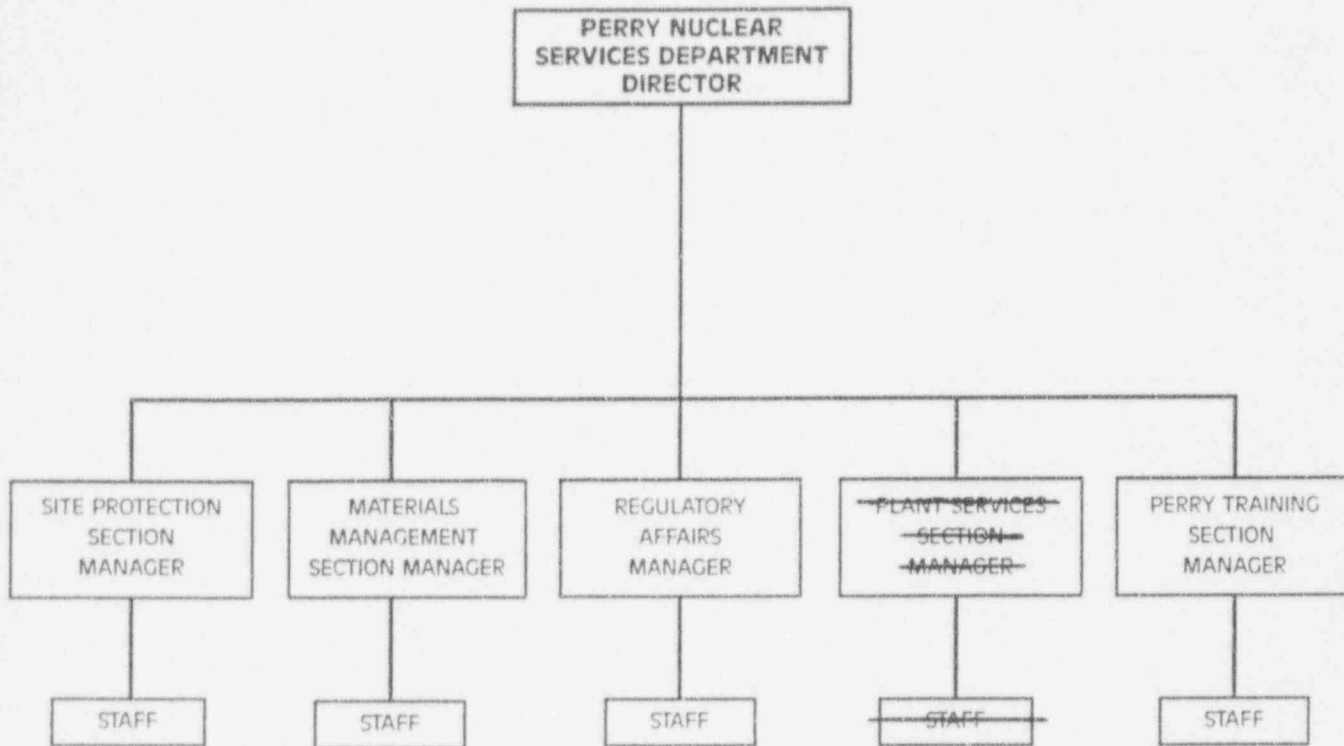
(Rev. 6 3/94)




PERRY NUCLEAR POWER PLANT
THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY

Perry Power Plant
Operating Organization

Figure 13.1-2



(Rev. 6 3/94)

	PERRY NUCLEAR POWER PLANT THE CLEVELAND ELECTRIC ILLUMINATING COMPANY
	Perry Nuclear Services Department Organization Figure 13.1-5

Responsibility for review and coordination of their activities rests with the Director, PNED. The Director, PNED, is the Chairman of the Plant Operations Review Committee.

The Perry Nuclear Services Department consists of ^{four}~~five~~ sections: Site Protection, Regulatory Affairs, ~~Plant Services~~, Materials Management, and Perry Training Sections. The responsibilities of each element are discussed in Section 13.1.2.2.3.

The Perry Nuclear Assurance Department consists of ^{four}~~three~~ sections: Quality Assurance, Quality Control, and Independent Safety Engineering Group Sections. The responsibilities of the department and each section are discussed in Sections 17.2.1.3.2.2, 17.2.1.3.2.2.1, 17.2.1.3.2.2.2, ~~and~~ 17.2.1.3.2.2.3, and 17.2.1.3.2.2.4.

Quality Services

No changes to this page,
included for continuity purposes.

17.2.1.3.2.2 Perry Nuclear Assurance Department (PNAD)

The Perry Nuclear Assurance Department has the functional authority, independence, and responsibility to verify the effective implementation of the administrative controls and the Quality Assurance Program during the Operational Phase of the Perry. Designated PNAD individuals routinely attend plant work schedule and status meetings in order to identify those plant activities which are safety-related and require QA coverage so that appropriate QA controls may be applied. Figure 17.2-2 shows the organizational structure of PNAD. The Director, PNAD reports directly to the Vice President, Nuclear - Perry. This reporting relationship has been established to provide PNAD with sufficient independence from the influence of cost and

schedule to be able to effectively assure conformance to Operational Quality Assurance Program requirements. The Director, PNAD, has the overall authority and responsibility for the Quality Assurance Program for Perry.

except for those non-quality assurance related functions of the manager, Quality Services Section. Therefore, the Director, PNAD will be able to give adequate attention to
The Director, PNAD, has no other duties or responsibilities unrelated to QA and ISEG ~~that would prevent full attention to these matters~~, has direct access to management levels which will assure the authority, and has a staff of sufficient size which will assure the ability:

QA
and
ISEG
matters.

The Director, PNAD

- a. To evaluate the manner in which all activities, both onsite and offsite are conducted, with respect to quality, by means of check, review, audit, surveillance, and inspection.
- b. To perform evaluations on a planned and periodic basis to verify that the Quality Assurance Program is being effectively implemented.
- c. To identify quality problems, to initiate, recommend or provide solutions through designated channels and to verify implementation of resolutions.
- d. To initiate stop work action or control further processing, delivery, or installation of nonconforming material or activity as described in the applicable quality assurance procedures.

The specific responsibilities of the Director, PNAD, include the following:

- a. Prepare, review and approve procedures and changes thereto, required to implement the requirements of this QA Program.

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included for continuity purposes.

- b. Provide for the review and approval of the QA program of contractors providing services, and of vendors supplying materials, parts or components covered by the scope of this document.
- c. Provide for review and approval of procedures prepared by other organizations when these procedures control or exercise an effect upon an activity that falls within the scope of this document.
- d. Provide direction and supervision of the PNAD organization.
- e. Maintain a working interface and communication with the NRC, other organizations, consultants, contractors, vendors, and others as required to effectively execute the policies presented in this description of the QA Program.
- f. Provide for a system of planned and periodic audit and inspection of organizations, contractors and vendors performing activities that fall within the scope of this document.
- g. Provide for a system of planned and periodic internal audit to assure the implementation of QA policies, procedures and instructions by organizations addressed in the Operational QA Program.
- h. Establish and assure the continuous implementation of an indoctrination and training program for PNAD QA/QC personnel and assure that a quality assurance indoctrination is provided to appropriate personnel outside the QA organization.
- i. Regularly report to the Vice President, Nuclear - Perry, the status of quality activities, and bring to his attention immediately, any significant quality-related problem or deficiency.

- j. Provide for QA review and concurrence of safety-related plant modification and maintenance work authorizations. This includes the review of associated design documents to ensure proper review and approval, and inclusion of necessary quality assurance requirements.
 - k. Provide for QA review and approval of procurement documents generated for the acquisition of materials and services that fall within the scope of this document.
 - l. Provide for and maintain Quality Assurance records generated by PNAD until such time as they are turned over for permanent storage.
 - m. Periodically evaluate and report on the status and adequacy of the Quality Assurance Program to appropriate management.
 - n. Perform receiving inspection activities at the plant site.
 - o. Provide for adequate levels of inspection and surveillance of plant activities.
 - p. Provide the resources necessary to ensure that the Independent Safety Engineering Group can perform the activities described in Appendix 1A, Item I.B.1.2 and Section 13.4.3.
 - q. Provide general and procedural administrative services, document control, and records management.
- Qualification requirements for the Director, PNAD, at the time are:
- a. Management experience through progressive assignment of increasing responsibility.
 - b. Formal degree in a science or engineering discipline or professional registration or equivalent.

performs receipt inspection for items and services within the scope of this document. The Manager, Quality Control Section is also responsible for coordinating site quality functions associated with construction, reviewing work orders, non-destructive examination (NDE) support, inspecting maintenance or modification activities for Perry, reviewing work procedures and completed documentation and providing PNAD coordination and support for outages during operations.

17.2.1.3.2.2.3 Manager, Independent Safety Engineering Group

The Manager, Independent Safety Engineering Group (ISEG) is responsible for performing the activities contained in the ISEG Charter as described in Appendix 1A Item I.B.1.2 and Sections 13.4.3. This Manager ensures that the ISEG examines plant operating characteristics, NRC issuance, industry information and other sources of design and operating experience that may indicate ways of improving plant safety. The ISEG performs periodic, independent reviews of plant activities and aids in establishing programmatic requirements. Members of the ISEG report to the Manager, ISEG, who reports to the Director, PNAD.

17.2.1.3.2.2.4 manager, Quality Services Section

(insert from page 13.1-19)

17.2.6.3 Responsibilities and Authorities

17.2.6.3.1 ^{Assurance} Director, Perry Nuclear ~~Services~~ Department

The Director, ^{PNAD}~~PNAD~~, is responsible for controlling documents affecting the quality of safety-related structures, systems and components at the plant in accordance with administrative procedures which conform to the requirements of this section. This ^{responsibility includes the}~~Director is also responsible for~~ control and distribution of procedures and instructions at Perry.

~~17.2.6.3.2 Director, Perry Nuclear Assurance Department~~

The Director, PNAD, is ^{also}~~is~~ responsible for assuring the review and approval of project documents defining the document control measures. In addition, the Director, PNAD, is responsible for evaluation of the project document control effectiveness through audit and other QA techniques.

17.2.7 CONTROL OF PURCHASED MATERIAL, EQUIPMENT AND SERVICES

17.2.7.1 Policy

The procurement control of material, equipment and services during the operations phase shall be performed in accordance with written policies and procedures. Quality Assurance measures shall apply to the procurement of services and materials including spare parts, replacement

- g. Documented measures shall be established to assure retrievability of records and to preclude their loss by such means as duplicate files, microfilming, etc.

17.2.17.3 Responsibilities and Authorities

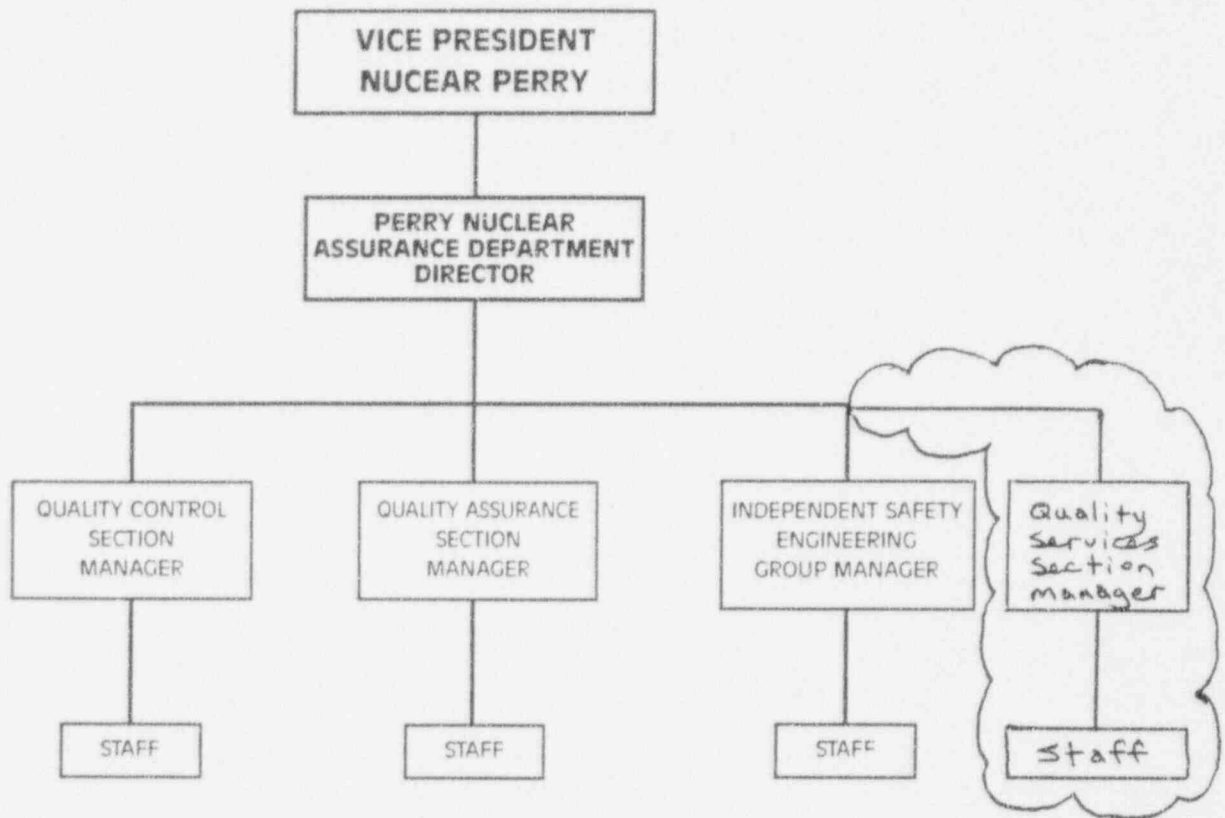
Assurance

17.2.17.3.1 Director, Perry Nuclear ~~Services~~ Department

~~The Director, Perry Nuclear Services Department, is responsible for maintaining and storing records at the plant in accordance with approved written procedures which conform to the requirements and policy of this section.~~

~~17.2.17.3.2 Director, Perry Nuclear Assurance Department~~

The Director, PNAD, is responsible for approving the general requirements for the maintenance of quality assurance records; reviewing and approving major participating organizations' procedures for the maintenance of Quality Assurance records; establishing a program for the identification, storage, retrieval, and maintenance of Quality Assurance records ^{including} ~~generated by PNAD until they are turned over to PNSD for~~ indexing, permanent storage, maintenance, and retrievals; and performing planned and periodic audits to verify adequacy and implementation of QA record requirements by both internal organizations and external suppliers.



(Rev. 6 3/94)

	PERRY NUCLEAR POWER PLANT THE CLEVELAND ELECTRIC ILLUMINATING COMPANY
Perry Nuclear Assurance Department Organization Figure 17.2-2	

ATTACHMENT 2

TO LETTER PY-CEI/NRR-1844 L

DETAILS OF THE CHANGE

Implementation of this proposed change would affect several portions of the Perry Nuclear Power Plant (PNPP) Updated Safety Analysis Report (USAR) which describe the Quality (currently "Plant") Services Section organization and functions, and which illustrate the organizational placement of this Section. Text and Figure changes directly associated with implementation of this specific reporting change from the Director, Perry Nuclear Services Department (PNSD) to the Director, Perry Nuclear Assurance Department (PNAD) are included in Attachment 1 to this letter and described below.

Text Changes

Section 13.1.2.2.3 Perry Nuclear Services Department Responsibilities and Authorities, Section 13.1.2.2.4 Perry Nuclear Assurance Department Responsibilities and Authorities, and Section 17.2.1.3.2.2 Perry Nuclear Assurance Department Responsibilities and Authorities

In 13.1.2.2.3, under the heading "Director, Perry Nuclear Services Department", remove responsibilities for providing general and procedural administrative services, document control, and records management; relocate these responsibilities to 13.1.2.2.4, and also include them in the portion of 17.2.1.3.2.2 which outlines the specific responsibilities of the Director, PNAD.

In 13.1.2.2.3, remove the paragraph beginning with the heading "Manager, Plant Services Section"; relocate a revised version of this paragraph to 17.2.1.3.2.2 as a new section 17.2.1.3.2.2.4 immediately following Section 17.2.1.3.2.2.3. The revised paragraph reads: "The Manager, Quality Services Section is responsible for implementing the Perry procedure/instruction program, performing document and drawing control activities, providing permanent storage for and retrieval of construction and operations records, and for furnishing administrative services in support of plant activities. The Manager, Quality Services Section reports to the Director, PNAD."

Section 17.2.1.3.2.1 Perry Departments Responsibilities and Authorities

Remove the reference to Plant Services Section from the listing of Sections that comprise the Perry Nuclear Services Department; add a reference to Quality Services Section into the listing of Sections comprising the Perry Nuclear Assurance Department, along with a reference to newly created USAR Section 17.2.1.3.2.2.4. PNAD will now consist of four sections: Quality Assurance, Quality Control, Independent Safety Engineering Group, and Quality Services.

Section 17.2.1.3.2.2 Perry Nuclear Assurance Department (PNAD) Responsibilities and Authorities

Revise the sentence that currently reads "The Director, PNAD, has no other duties or responsibilities unrelated to QA and ISEG that would prevent full attention to these matters, has direct access to...", as follows:

"The Director, PNAD, has no other duties or responsibilities unrelated to QA and ISEG except for those non-quality assurance related functions of the Manager, Quality Services Section. Therefore, the Director, PNAD, will be able to give

adequate attention to QA and ISEG matters. The Director, PNAD, has direct access to..."

Section 17.2.6.3 Responsibilities and Authorities for Document Control

Combine Sections 17.2.6.3.1 and 17.2.6.3.2 into one section entitled "Director, Perry Nuclear Assurance Department", and change the one reference to PNSD to read PNAD. Minor editorial changes would also be made to combine the two paragraphs together.

Section 17.2.17.3 Responsibilities and Authorities for Quality Assurance Records

Combine Sections 17.2.17.3.1 and 17.2.17.3.2 into one section entitled "Director, Perry Nuclear Assurance Department", and delete the sentence that was previously contained within Section 17.2.17.3.1. In the sentence that was previously in Section 17.2.17.3.2, delete the reference to turning over quality assurance records to PNSD by rewording the sentence to read "...maintenance of Quality Assurance records including indexing, permanent storage..."

Figure Changes

Figure 13.1-2 Perry Plant Operating Organization

Revise this Figure to illustrate Quality Services Section reporting to the Director, Perry Nuclear Assurance Department. Delete the illustration on the present Figure which shows Plant Services Section reporting to the Director, PNSD.

Figure 13.1-5 Perry Nuclear Services Department Organization

Delete illustration of Plant Services Section.

Figure 17.2-2 Perry Nuclear Assurance Department Organization

Revise this Figure to show Quality Services Section as a part of the PNAD organization and reporting to the Director, PNAD.

REASON FOR THE CHANGE

The reporting point for the Quality (currently "Plant") Services Section is proposed for change as part of a restructuring effort to improve the plant's operations and efficiency. As part of the restructuring, the Quality Services Section will report to the Director, Perry Nuclear Assurance Department. The Plant Services Section currently reports to the Director, Perry Nuclear Services Department. The change will allow the Director - Perry Nuclear Assurance Department to assume additional responsibilities, including some non-quality assurance functions.

The Manager, Quality (currently "Plant") Services Section is responsible for implementing the Perry procedures and instruction program, performing document and drawing control activities, providing permanent storage for and retrieval of construction and operations records, and furnishing administrative services in support of plant activities.

BASIS FOR THE CHANGE

The current USAR Section 17.2.1.3.2.2 states that the Director, PNAD, has no duties which "would prevent full attention" to QA and ISEG matters. Under the proposed reorganization, the position of Director - Perry Nuclear Assurance Department will now oversee some duties not directly related to quality assurance (QA) or the independent safety engineering group (ISEG). Although the Director PNAD would still be capable of directing full attention to QA and ISEG matters when called upon to do so, the addition of some non-QA administrative functions to PNAD was determined to be a reduction in the "full attention" wording of the QA program description in the PNPP USAR. However, this proposed change is considered to be acceptable. The basis for concluding that the position of Director - Perry Nuclear Assurance Department, with the addition of some non-QA related duties, will continue to satisfy the requirements of 10 CFR 50 Appendix B is provided below.

The phrase "has no other duties or responsibilities unrelated to QA and ISEG that would prevent full attention to these matters" (ref. USAR Section 17.2.1.3.2.2) is not a requirement of 10 CFR 50 Appendix B, Quality Assurance Criteria for Nuclear Power Plants, Criterion I - Organization. The requirements of Criterion I do not preclude persons and organizations performing quality assurance functions from also performing non-quality assurance functions.

Under provisions of 10 CFR 50 Appendix B, Criterion I, persons and organizations performing quality assurance functions must have sufficient authority and organizational freedom to identify quality problems; to initiate, recommend, or provide solutions; and to verify implementation of solutions. It also requires those persons and organizations performing quality assurance functions to report to a management level such that the required authority and organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations, are provided. The proposed changes and USAR 17.2.1, ORGANIZATION, establish sufficient authority and organizational freedom, and sufficient independence from cost and schedule when opposed to safety considerations for the quality assurance function, and continue to satisfy the provisions of 10 CFR 50 Appendix B, Criterion I.

The non-quality assurance functions of the Manager, Quality Services Section only involve administrative "flow, process and control" services which do not affect the safety related functions of structures, systems and components. The "technical content" of related activities (including plant procedures/instructions, document preparation, quality assurance records) would continue to be performed by the responsible technical organization. The audit and surveillance activities of the Manager - Quality Assurance Section will remain independent of these non-quality assurance function, just as they have previously been in evaluating the existing Quality Control Section functions.

In summary, the Director, Perry Nuclear Assurance Department will have the following functional responsibilities in addition to the quality assurance responsibilities presently held: plant procedure/instruction control, document control, records management, and various administrative services. The basis

for concluding that the organization changes identified above continue to satisfy the requirements of 10 CFR 50 Appendix B is as follows:

1. The proposed changes will not diminish or reduce the effectiveness of the quality assurance functions that are currently described.
2. The changes continue to provide sufficient authority and organizational freedom of the quality assurance functions to identify quality problems and provide sufficient independence from cost and schedule when opposed to safety considerations.
3. The non-quality assurance functions do not affect the safety related functions of structures, systems and components.
4. The audit and surveillance activities of the Manager - Quality Assurance Section will remain independent of all these additional functions just as they have previously been in evaluating existing Quality Control Section functions.
5. The quality assurance functions performed by the Perry Nuclear Assurance Department are periodically assessed by the Nuclear Safety Review Committee and by external organizations such as the Nuclear Regulatory Commission, Institute of Nuclear Power Operations, and management assessment teams from other nuclear power plants.

This reorganization is perceived to enhance existing goals of providing safe, reliable and efficient operation of the Perry Nuclear Power Plant.