



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN

VICE PRESIDENT  
NUCLEAR

June 21, 1983  
PY-CEI/NRR-0053L

Mr. B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Perry Nuclear Power Plant Docket  
Nos. 50-440, 50-441 Response to  
Generic Letter 83-18 NRC Staff Review  
of the BWR Owners' Group Control Room  
Survey Program

Dear Mr. Youngblood:

This letter is in response to Generic Letter 83-18 "NRC Staff Review of the BWR Owners' Group (BWROG) Control Room Survey Program." We are pleased that you have found the BWROG Control Room Survey Program as an acceptable approach to the planning and review phases of the Detailed Control Room Design Review (DCRDR). The Cleveland Electric Illuminating Company has previously informed the NRC of our intent to reference the BWROG program for the Perry Nuclear Power Plant. Information concerning our program is contained in a letter to Mr. A. Schwencer from our Mr. D. R. Davidson dated June 7, 1982. We would like to take this opportunity to address the specific requests of Generic Letter 83-18 for plant specific information. Where this information has previously been submitted in the above letter it is so noted. The following item numbers are from GL 83-18:

1. Item a.i. The individuals who participated in the BWROG Survey Team were identified in Table I of Attachment 2 to the June 7, 1982 submittal. Survey Team members responsibilities are explained in Attachment 1 of June 7, 1982 submittal. Further information concerning the individual's formal education and professional experience is being assembled by General Electric and will be incorporated into our final documentation.
2. Item a.ii. The Control Room design review conducted at Perry was performed in accordance with the methodology specified in the BWROG program submitted in Attachment 1 to the June 7, 1982 submittal, with no exceptions taken.
3. Item a.iii. As identified in the June 7, 1982 submittal, a Human Factors Task Force has been established at Perry to evaluate human factors concerns. Prioritization or categorization of the identified Human Engineering Discrepancies (HED's) will not be required since it is our present intent to identify and correct all pertinent HED's prior to fuel load. The HED's identified in the BWROG survey and a subsequent audit by

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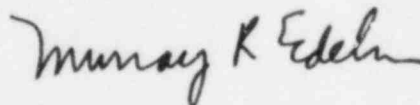
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the NRC Human Factors Engineering Branch have already been reviewed and the results submitted to you in the June 7, 1982 submittal and in a letter to B. J. Youngblood dated May 4, 1983 (PY-CEI/NRR-0040L). These findings and those identified in an upcoming supplemental survey will all be contained in the final summary report to be submitted no later than six (6) months prior to fuel load. The status and schedule of implementation will be identified in the summary report. In addition, the Human Factors Engineering Branch has requested another in-progress audit to assess program implementation. This audit will be scheduled after completion of the supplemental survey, to be conducted later this year.

4. Item b. We intend to complete the BWROC Control Room survey Checklist Supplement as part of our supplemental survey. This has been committed to in the June 7, 1982 submittal and is included as Attachment 3 of that submittal.
5. Item c. As identified in Item 3 above, HED's will not be prioritized. The corrective actions of identified HED's have been reported as discussed in Item 3. The implementation schedule and results will be contained in the final summary report.
6. Item d. The supplemental survey to be conducted later this year will include a task analysis using the Perry Plant Emergency Instructions, which were developed from the generic BWR Owners Group Emergency Procedure Guidelines.
7. Item e. Since Perry is not an operating plant, an updated operating experience review will not be conducted.

We hope this clarifies our intent with respect to the BWROC program and the DCRDR for Perry. If we can be of any further assistance, please contact us.

Very truly yours,



Murray R. Edelman  
Vice President  
Nuclear Group

MRE:jeg

cc: Jay Silberg, Esq.  
John Stefano  
Max Gildner