



**CENTERIOR  
ENERGY**

**PERRY NUCLEAR POWER PLANT**

10 CENTER ROAD  
PERRY, OHIO 44081  
(216) 259-3737

Mail Address:  
PO. BOX 97  
PERRY, OHIO 44081

**Michael D. Lyster**  
VICE PRESIDENT - NUCLEAR

April 22, 1991  
PY-CEI/NRR-1345 L

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

Perry Nuclear Power Plant  
Docket No. 50-440  
Response to Notice of Violation

Gentlemen:

This letter acknowledges receipt of the Notice of Violation contained within Inspection Report 50-440/91-003 dated March 20, 1991. The report identified areas examined by Region III Inspectors from January 8, 1991, through February 28, 1991.

Our response to Notice of Violation 50-440/91003-10, is provided in Attachment 1.

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

Sincerely,

Michael D. Lyster

MDL:DWG

Attachment

cc: NRR Project Manager  
Sr. Resident Inspector  
USNRC Region III

Operating Companies  
Cleveland Electric Illuminating  
Toledo Edison

260012  
9104260130 910422  
PDR ADCK 05000440  
Q PDR

IEO1  
11

50-440/91003-10

Restatement of Violation

10 CFR Part 50, Appendix B, Criteria V, required, in part, that activities affecting quality be prescribed by documented procedures appropriate to the circumstances and be accomplished in accordance with those procedures. Perry Administrative Procedure (PAP)-0205, Revision 6, "Operability of Plant Systems," Section 6.1.2, required, in part, that prior to declaring a system or component operable, the Unit Supervisor review the system configuration to insure that the system was in the applicable Standby Readiness or Secured status. Electrical Lineup Instruction (ELI)-R23, Revision 3, "480 Volt Load Centers," paragraph 4, identified the required position of feeder breaker EF1B12 as closed.

Contrary to the above, on January 29, 1991, the Division 1 containment hydrogen recombiner was restored to service, after review by the Unit Supervisor, with feeder breaker EF1B12 open.

This is a Severity Level IV violation (Supplement I).  
(50-440/91003-10)(DRP)).

Corrective Actions That Have Been Taken and Results Achieved

On February 1, 1991, the on-shift Control Room Unit Supervisor was asked to investigate an abnormal temperature indication on the Division 1 hydrogen recombiner. An investigation determined that the indicator in question fails "as-is" on loss of power, and since the recombiner was not energized, it was assumed that the indicator had remained at its last temperature indication following system operation for Surveillance Instruction SVI-M51-T1246, Hydrogen Recombiner Heater Test. No further action was pursued at this point.

On February 13, 1991, the Control Room was again contacted to investigate this same issue. Further review of this event revealed that the temperature instrument received its power from breaker EF1B12 which feeds the Division 1 hydrogen recombiner and panel (1H15-P094). The Control Room Unit Supervisor directed that this breaker be closed, at which point the temperature indication returned to the proper ambient indication for this instrument. It should be noted that the Combustible Gas Control System (M51) recombiner operability was not affected during this event, as recombiner operation is manual in nature, and the procedure covering its operation verifies breaker EF1B12 closed during recombiner startup. Later that day, this event was documented in accordance with the Condition Report Process.

The Condition Report investigation determined that the Control Room Unit Supervisor did not return breaker EF1B12 to its required closed position following performance of Surveillance Instruction SVI-M51-T1246, conducted on January 29, 1991. This was contrary to Electrical Lineup Instruction ELI-R23.

Plant Administrative Procedure (PAP-1401), Safety Tagging, states that appropriate valve lineup instructions (VLI) and/or electrical lineup instructions (ELI) should be utilized to specify return positions when authorizing tag clearance. Following performance of SVI-M51-T1246 on January 29, 1991, the Control Room Unit Supervisor utilized the system operating instruction rather than the ELI for determining the required return position for breaker EF1B12. Startup instructions in this system operating instruction state: "Place the PWR OUT SW in ON and verify the red status light on the control switch plate is energized. If red light is not ON, verify EF1B12(EF1D12) closed and check the integrity of fuses F1 and F2 in 1M51-S001(1M51-S002)." The Control Room Unit Supervisor assumed that the required position for breaker EF1B12 was open/racked-in, since the instruction considers that this breaker may require closure during recombiner startup.

The Shift Supervisor discussed this event with the Control Room Unit Supervisor. During this discussion the following was stressed: (1) the need to utilize proper references, and (2) the need to pay more attention to detail when performing his duties.

#### Corrective Actions to Avoid Further Violations

No further corrective actions are considered necessary to preclude further violations.

#### Date When Full Compliance Will be Achieved

Full compliance was achieved on February 13, 1991, when the Control Room Unit Supervisor directed that breaker EF1B12 be closed, at which point the temperature indication returned to the proper ambient indication for this instrument.