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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

April 15, 1983

PY-CEI/NRR-0032 L

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
Our Response to Generic Letter 82-33
NUREG-0737, Supplement 1

Dear Mr. Youngblood:

This letter forwards the Cleveland Electric Illuminating Company's response to Generic Letter 82-33. This response addresses those items recommended by members of the NRC staff in regional meetings conducted on this subject.

The scheduled completion dates in the attached report are keyed to fuel load of Unit 1 currently scheduled for December 1984. Items required for Unit 2 operation only will be implemented on a schedule consistent with Unit 2 fuel loading.

If you have any questions on this information or require additional clarification of our plans regarding this issue, please contact us.

Very truly yours,

Murray R. Edelman

Murray R. Edelman
Vice President
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This report addresses the following items defined in Supplement 1 to NUREG-0737.

- o Safety Parameter Display System (SPDS).
- o Detailed Control Room Design Review (DCRDR).
- o Regulatory Guide 1.97.
- o Emergency Operating Procedures.
- o Emergency Response Facilities.
- o Integrated Training Plan

SAFETY PARAMETER DISPLAY SYSTEMInformation Provided:

- o Current Status of the SPDS Design.
- o Date for submitting parameter selection safety analysis.
- o Date when SPDS will be operable and operators trained.
- o Type of NRC review requested.
- o Proposed integration schedule.

Discussions:

Perry's Safety Parameter Display System (SPDS) is part of a package purchased from General Electric known as the Emergency Response Information System (ERIS). ERIS is a two part, basic and enhanced, information package. The basic portion of the system will implement the Critical Safety Functions (CSF'S) to support an SPDS.

The basic ERIS design is approximately 75% complete. Construction of the system has started and the system will be operable before fuel load. Operator training on the use of the SPDS will also be completed prior to fuel load. An NRC audit to perform a post implementation review of the SPDS is requested by the owner.

The safety analysis used to implement and select the SPDS parameters was part of our Emergency Procedure Guidelines (EPGs). Since the Plant Emergency Instructions (PEIs) are consistent with the EPGs, it then follows that the EPGs are an appropriate basis for the selection of SPDS parameters. Additional information describing the basis for parameter selection and verification and

validation of the SPDS will be supplied to the NRC six (6) months prior to fuel load.

A complete description of the SPDS can be found in a submittal forwarded to the NRC in a letter M. R. Edelman to B. J. Youngblood dated March 31, 1983.

The SPDS will be integrated with the other NUREG-0737, Supplement 1 requirements prior to fuel load.

DETAILED CONTROL ROOM DESIGN REVIEWInformation Provided:

- o Current status of DCRDR.
- o Program Plan submittal.
- o Date for submittal of summary report.

Discussion:

Perry has been actively involved with the BWR Owners Group for Control Room Human Factors Review. A Human Factors Control Room Survey was conducted on September 21-25, 1981 in accordance with the BWR Owners Group program. Subsequent to this, the NRC conducted their own review on August 9-13, 1982. The NRC report from this review was issued on November 12, 1982. We are presently in the process of evaluating the NRC report and expect to issue a response to these findings shortly.

At this time, no physical control room changes for human factors have been implemented. This process is expected to begin upon completion of the response to the NRC findings. Nicholson Nuclear Science and Engineering has been retained to provide human factors expertise. A supplemental survey is being planned for late 1983 to complete the DCRDR.

The Perry Human Factors program plan was submitted to the NRC's Mr. A. Schwencer on June 7, 1982.

As stated in the Program Plan submittal, the summary report will be submitted approximately six months prior to fuel load.

REGULATORY GUIDE 1.97

Information Provided:

- o Date for implementing Regulatory Guide 1.97.

Discussion:

The variables and associated requirements of NRC Regulatory Guide 1.97, Rev. 2, have been reviewed and utilized as guidance in CEI's plans to provide instrumentation to assess plant and environs conditions during and following an accident. These plans will be described in an upcoming FSAR amendment.

The installation of those items committed to for Regulatory Guide 1.97, Revision 2, as described in the upcoming FSAR amendment, will be accomplished for PNPP by fuel loading except for fuel zone reactor water level. Instrumentation for this variable will be installed during PNPP's Unit 1 first scheduled fuel outage.

EMERGENCY OPERATING PROCEDURESInformation Provided:

- o Current status of EOP development.
- o Status of generic technical guidelines.
- o Date for submittal of procedures generation package.
- o Date for implementing EOPs.

Discussion:

The generic Emergency Procedure Guidelines for BWRs has been submitted to the NRC. These guidelines have been reviewed and an SER has been issued. The Emergency Operating Perry specific Plant Emergency Instructions will be based on the BWR EPGs. Procedures at Perry are identified as the Plant Emergency Instructions (PEIs).

The PEIs are currently in draft form and will be completed in enough detail to support operator cold license training currently scheduled to begin May 1, 1983. The final approved PEIs will be ready for implementation at fuel load.

The procedures generation package will be submitted to the NRC twelve months prior to fuel load.

EMERGENCY RESPONSE FACILITIES

Information Provided:

- o Date for fully functional
 - Technical Support Center (TSC)
 - Operations Support Center (OSC)
 - Emergency Operations Facility (EOF)

Discussion:

The TSC, OSC, and EOF will be fully functional by fuel load of Unit 1. A detailed description of these facilities has been submitted to the NRC staff in a letter M. R. Edelman to B. J. Youngblood dated March 31, 1983.

INTEGRATED TRAINING PLANInformation Provided:

- o Date for completion of training plan.

Discussion:

Training of operators and other utility and site personnel has been in progress for many years. Control room operator training has intensified as the initial operator cold license examinations are to be given in August 1983. Operators are trained in the use of procedures and equipment which are effective or installed as of the date of the examination. Changes to procedures or equipment are included in the requalification training programs. For use with the August operator examinations, Plant Emergency Instructions (PEIs) shall be available and the operator trained to be proficient in their use. However, the submission of the Procedures Generation Package will be delayed until after the initial operator licensing but prior to fuel load. This will allow revision and updating of the PEIs prior to actual fuel load. Revisions to the PEIs will be incorporated into the requalification and initial licensing training programs and the operators trained to be proficient in their use prior to actual fuel load.

SPDS equipment, DCRDR installations, and other revisions to the Perry Plant shall generally be incorporated into the Perry Control Room Simulator and the operator trained to be proficient in their use prior to fuel load. Where installation into the simulator is not feasible or desirable, then revisions and additions to the Perry Plant which affect the realm of operators will be

included in the requalification and initial operator licensing programs prior to fuel load.

Training of operators and other site personnel in the use of Emergency Response Facility equipment and associated procedures shall occur prior to the Emergency Preparedness Appraisal. Training objectives and materials are currently under development. The adequacy of ERF training shall be judged by successful completion of the Emergency Preparedness appraisal and exercise prior to actual fuel load.

Training plans for operators are currently available. Where practical, training for plant equipment and revisions shall occur prior to equipment activation. However, prior to actual fuel load, completion of user training shall not be a prerequisite for equipment installation or activation. Revisions to these training programs shall be a continuous procedure occurring in due process. Stable control room operator training plans in support of NUREG-0737 Supplement 1 will be implemented on or before the submittal of the Procedures Generation Package. Training plans for ERF personnel shall be available as necessary to support the Emergency Preparedness appraisal.