



**CENTERIOR  
ENERGY**

**PERRY NUCLEAR POWER PLANT**

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VICE PRESIDENT - NUCLEAR

November 17, 1994  
PY-CEI/NRR-1885L

United States Nuclear Regulatory Commission  
Document Control Room  
Washington, D.C. 20555

Perry Nuclear Power Plant  
Docket No. 50-440.  
Revision to Commitment for  
Independent Verification

- References:
1. May 30, 1989 letter from Nuclear Regulatory Commission to the Cleveland Electric Illuminating Company, Diagnostic Evaluation Team Report for Perry Nuclear Power Plant
  2. July 29, 1989 letter from A. Kaplan to Nuclear Regulatory Commission, Diagnostic Evaluation Team Report (PY-CEI/NRR-1043L)
  3. July 15, 1994 letter from R. Stratman to Nuclear Regulatory Commission, Response to Notice of Violation, Attachment 2 - Response to Safety Tagging Concern (PY-CEI/NRR-1828L)

Gentlemen:

In section 3.2.3 of the NRC Diagnostic Evaluation Team Report (Reference 1), a potential weakness involving independent verification was identified. Perry Administrative Procedure (PAP) 0205, "Operability of Plant Systems," did not specifically state that the person performing the verification be separated by time and distance from the person performing initial valve positioning. In the response to the NRC Diagnostic Evaluation Team Report (Reference 2), PNPP stated that PAP-0205 would be revised to require that the independent verifier and the initial positioner be separated by time and distance, except for special cases such as positioning throttle valves. This change was implemented in 1989.

Operating Companies  
Cleveland Electric Illuminating  
Toledo Edison

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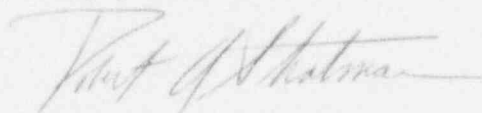
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November 17, 1994  
PY-CEI/NRR-1885L  
Page 2

Since that time, a Safety Tagging Program Improvement Task Force has been established to review the safety tagging program at PNPP for improvements (Reference 3). One recommendation of the Task Force is to remove the requirement of time and distance separation for independent verification. This change provides advantages in consistency, improved efficiency, and reduction in dose while maintaining independence between the positioner and verifier. The integrity of the verification process will be maintained by the requirement to minimize the interaction between the positioner and verifier. PAP-0205 will be revised to remove the requirement of separation by time and distance for independent verifications and will also include guidance to ensure that the verifier will not rely upon the observed actions of the positioner to determine the correct component, position, or condition. PNPP will implement this change on or after January 15, 1995.

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

Very truly yours,



DAH:sc

cc: NRC Project Manager  
NRC Resident Inspector  
NRC Region III