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ENERGY**

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Robert A. Stratman
VICE PRESIDENT - NUCLEAR

October 18, 1994
PY-CEI/NRR-1836L

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

Perry Nuclear Power Plant-Unit 1
Docket No. 50-440
Resolution and Withdrawal of
10 CFR 50.9 Report Concerning
Individual Plant Evaluation Submittal

Gentlemen:

On June 15, 1994, a telephone report was made to the Region III Office of the U. S. Nuclear Regulatory Commission concerning the finding of incorrect information contained in a submittal for the Perry Nuclear Power Plant (PNPP) dated July 15, 1992 (letter PY-CEI/NRR-1517L). The letter reported the completion of the PNPP Individual Plant Evaluation (IPE) and characterized improvements identified from the results of the IPE as complete, proceeding to completion, or under evaluation. The June 15, 1994 report to Region III identified that the improvements reported as complete in letter PY-CEI/NRR-1517L had not been incorporated into procedures as stated. The following provides a description of the incident and the investigation conclusions.

During performance of Perry Nuclear Assurance Department (PNAD) audit PA 94-26, "Station Blackout", review was made of the Individual Plant Evaluation (IPE) submittal, letter PY-CEI/NRR-1517L. This letter cited improvements made to, to be made to, and/or being evaluated for incorporation into plant instructions or plant design. Specifically, letter PY-CEI/NRR-1517L stated, in Attachment 1, "PLANT IMPROVEMENTS MADE DUE TO IPE INSIGHTS" that improvements had been made to the "Loss of Offsite Power" instruction (instruction number not cited) which incorporated the following:

- (1) Retention of RCIC isolation bypass for high steam tunnel temperature
- (2) Enhanced process for crosstying Unit 1 and 2 batteries
- (3) Enhanced process for offsite power recovery to HPCS and alternate injection system buses

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The audit cited that the present revision of Off Normal Instruction ONI-R10, Revision 4, "Loss of AC Power", did not appear to incorporate the significant enhancements of items 1 and 3 above as identified in letter PY-CEI/NRR-1517L for Station Blackout (SBO) and Loss of Offsite Power (LOOP) events. Additionally, it was cited that previous revisions to the ONI appeared to have degraded the enhancements from those identified during the IPE which was contrary to the base case assumptions credited in the IPE transmittal letter to the NRC (i.e., PY-CEI/NRR-1517L). Specifically, it was cited that ONI-R10, Revision 4, had omitted 1) RCIC isolation bypass for high steam tunnel temperature during LOOP and SBO events (it was only included for the Total Loss of AC), and 2) enhanced process for offsite power recovery to HPCS and alternate injection system buses. In that these enhancements were seemingly omitted/degraded from the time that letter PY-CEI/NRR-1517L was submitted to NRC, an evaluation for reportability under 10 CFR 50.9, "Completeness and Accuracy of Information", was conducted. A 10 CFR 50.9 report was made by telephone to NRC on June 15, 1994, stating that information credited in the IPE submittal was not included in the present revision of the associated procedure (i.e., ONI-R10, Revision 4). Further, it had been determined that at the time letter PY-CEI/NRR-1517L was submitted the required information had been incorporated into a revision (i.e., ONI-R10, Revision 2) to the procedure which was never issued. A subsequent revision (Revision 3) appeared to fail to incorporate the requirements. In that letter PY-CEI/NRR-1517L characterized the procedure changes as complete at the time of submittal and their omission could have had a significant impact on the IPE results, the report to NRC was made in accordance with 10 CFR 50.9.

Investigation of this event in accordance with the PNPP corrective action program is now complete. The investigation revealed that the enhancements not made on July 15, 1992, were incorporated into ONI-R10, Revision 3, which became effective on October 1, 1992. These enhancements were:

1. Enhanced process for crosstying Unit 1 and Unit 2 batteries
2. Enhanced process for offsite power recovery to HPCS and alternate injection systems buses

One of the items originally cited as not being incorporated into ONI-R10, retention of RCIC isolation bypass for high steam tunnel temperature during SBO and LOOP events, was appropriately within ONI-S11, Revision 2, which was in effect on July 15, 1992. Therefore, following the investigation, it is known that the above two items, characterized as "enhancements", are the only items which need to be considered under the 10 CFR 50.9 reporting criteria.

Based on the investigation conducted, the short duration of the omission of the committed improvements for the period from July 15, 1992 to October 1, 1992, and the assessment that this omission would not have affected the conclusions of the IPE that no vulnerabilities were identified for PNPP, a significant

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implication on the health and safety of the public was not effected.
Therefore, the report made on June 15, 1994, under 10 CFR 50.9 is hereby
withdrawn.

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

Very truly yours,



RAS:RMC:sc

cc: Regional Administrator, NRC Region III
NRC/NRR Project Manager
PNPP Senior Resident Inspector