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MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

February 13, 1985

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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 Units 1 & 2
Docket Nos. 50-440; 50-441
Fire Drill Technical Specification

Dear Mr. Youngblood:

This letter provides information to address the SER requirement in SSER 4, Section 13.3.2.1.4 (p.13-19, attached) for a Technical Specification related to fire drills.

10CFR50 Appendix R, paragraph I.3.b, requires that fire drills be conducted at least once per quarter. Section 13.2.5 of the FSAR states that training for the fire protection staff members will be conducted at least once per quarter and in accordance with plant procedures. Perry Administrative procedure, PAP-1819 Fire Drills, prescribes the programmatic method of fire brigade drills. This implements the requirements of 10CFR50 Appendix R. The requirement for a Technical Specification related to fire drills does not presently exist in the Standard Technical Specifications. This requirement is satisfied by the requirements of the 10CFR50 Appendix R, and is adequately covered by the commitment in the FSAR and implementing administrative procedure. This position will be reflected in the Revision 4 to Emergency Plan. We feel therefore that a Technical Specification on fire drills is not required.

We believe that this information is responsive to staff concerns, and request the SER be changed to delete the requirement for a Technical Specification on fire drills.

Very truly yours,

Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

Attachment

cc: Jay Silberg, Esq.
John Stefano (2)
J. Grobe
S. Brown

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adherence to a 12-month exercise frequency is not adequately reflected in the plan. The scope of the exercises will include testing the adequacy of the Plan and procedures, ensuring that emergency response personnel are familiar with their responsibilities and duties, and testing communications networks and systems. Testing of the public notification system as part of an exercise should be clearly specified in the Plan. The Plan does not clearly indicate that within a 5-year period the exercise scenario will be varied from year to year so that all major elements of the plan are tested. The Plan does, however, indicate that at least once every 3 years an exercise will commence during a back shift.

The Plan does not address conducting exercises under various weather conditions.

As a minimum, the following drills will be conducted:

(1) Communication Drills

Communications with the state and local authorities will be tested monthly. Communications with federal response agencies will be conducted quarterly. Communications between the site and state/local emergency operations centers (EOCs), and field monitoring teams will be tested monthly. The Plan does not indicate whether the communication drills include evaluating the aspect of understanding the contents of the message.

(2) Fire Drills

At least one drill per calendar quarter will be conducted involving plant personnel, and at least one drill in the calendar year will include participation by the local fire department. The guidance in NUREG-0654 indicates that these drills should be conducted in accordance with the plant Technical Specifications; however, the Plan does not address the guidance.

(3) Medical Emergency Drills

At least one drill per calendar year will be conducted. The drill will involve the participation of local medical support personnel and organizations, and will involve simulated cases of radiation overexposure and/or contamination of station personnel.

(4) Radiological Monitoring Drills

Plant environs and radiological monitoring drills (onsite/offsite) will be conducted annually. The drill will include collection and analysis of various sample media, and provisions for communications and recordkeeping will be evaluated.

(5) Health Physics Drills

These drills will be conducted semi-annually; they will involve response to, and analysis of simulated elevated airborne and liquid samples and direct radiation measurements. In addition, analysis of inplant liquid samples with actual elevated radiation levels will be included in the drills.