



PERRY NUCLEAR POWER PLANT

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

Main Address:
P.O. BOX 97
PERRY, OHIO 44081

September 19, 1996
PY-CEI/NRR-2092L

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Perry Nuclear Power Plant
Docket No. 50-440
Reply to a Notice of Violation In Accordance With 10 CFR 2.201

Gentlemen:

Enclosed is the Perry Nuclear Power Plant reply to the Notice of Violation contained in NRC Inspection Report 50-440/96-04, which was transmitted by letter dated August 21, 1996. The Notice of Violation involves inadequate corrective actions which resulted in a failure to perform testing of the Plant Underdrain system.

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

Very truly yours,

Lew W. Myers
Vice President - Nuclear

DTG:sc

7609240194 760919
DR ADOCK 05000440
PDR

Enclosure

cc: NRC Region III Administrator
NRC Resident Inspector
NRC Project Manager

1/1
I E01

REPLY TO A NOTICE OF VIOLATION

Violation 96004-03

Restatement of the Violation

10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action" requires that measures be established to assure that conditions adverse to quality such as deficiencies, deviations and nonconformances, are promptly identified and corrected.

Contrary to the above, a condition adverse to quality involving failure to perform Perry underdrain system testing at the frequency required by plant procedures, was not promptly corrected. The deficiency was discovered on June 18, 1992, but, as of May 1, 1996, the testing still was not being performed at the required frequency.

Reason for the Violation

On June 18, 1992, the System Engineering Section (SES) identified, via Corrective Action program Condition Report (CR) 92-182, that Periodic Test Instruction (PTI)-P72-P0001, "Plant Underdrain Continuity Test," and PTI-P72-P0002, "Plant Underdrain Groundwater Inflow Test" were not being performed as required by plant procedures. Performance of these PTIs is delineated in the Updated Safety Analysis Report (USAR), Hydrologic Engineering Section 2.4.13.5.4, "Maintenance and Testing." SES is responsible for coordinating the performance of the PTIs; however, these PTIs have been routinely deferred in the past. Evaluation of the CR determined that the routine deferral of these PTIs was caused by recurring equipment problems associated with the Plant Underdrain system and improper interpretation of Plant Administrative Procedure (PAP)-1105, "Surveillance Test Control," when deferring and rescheduling the PTIs.

After the corrective actions delineated in the above CR were closed, the PTIs continued to be deferred; SES did not apply the appropriate level of attention toward solving the equipment problems, nor were the necessary actions taken to meet the required testing. Additionally, the CR did not discuss or evaluate the apparent lack of management oversight/involvement. A review was conducted of outstanding/delinquent PTIs; no other PTIs were found to be routinely deferred. Specifically, the cause for routine deferral of Plant Underdrain system testing is a lack of management oversight/involvement regarding Plant Underdrain system testing.

A contributing factor to the inadequate management oversight/involvement was the level of management review required by PAP-1105 for deferred tests remained at the same level of management each time the tests were not performed; therefore, higher levels of management were not notified of the deferrals.

A contributing factor toward not performing the PTIs within the required test intervals continues to be poor availability of the Plant Underdrain pumping system. The pumping system is located in a corrosive environment (i.e., calcium carbonate buildup) which causes recurring component failures on pumps, float switches, electrical disconnects, pump control circuitry, etc. The past corrective actions have not been effective in managing the required system maintenance to ensure test performance.

Corrective Steps Taken and Results Achieved

SES has raised the priority for repairing the Plant Underdrain pumping system. Maintenance is now performing system inspections and repairs on a regular basis; system reliability has improved as a result.

The Plant Underdrain Continuity Test (PTI-P72-P0001) was performed in late July 1996 and early August 1996 with satisfactory results. The Plant Underdrain Groundwater Inflow Test (PTI-P72-P0002) was initiated on August 26, 1996, and will be complete on September 27, 1996. If equipment problems occur during performance of the PTI, efforts will continue until the test is completed with satisfactory results.

Corrective Steps That Will Be Taken To Avoid Further Violations

The Plant General Manager has verbally communicated to site section managers a management expectation regarding periodic testing and maintenance; testing required by commitments in the USAR, or other licensing bases documents will not be routinely postponed. In addition, the expectation includes a philosophy that postponement of testing is not acceptable without the proper level of attention/emphasis placed on performing tests in a timely manner.

These management expectations and provisions for higher levels of management oversight/involvement will be documented via a revision to PAP-1105. This revision will establish a hierarchy of review/approval levels that includes escalated approval for each successive/excessive PTI postponements, such that the appropriate level of management attention is achieved.

On-going engineering evaluation of the Plant Underdrain system to increase pump reliability will continue. The Plant Underdrain system design will be evaluated for practical design changes that will minimize the number of components impacted by the calcium carbonate buildup effect.

Improvements to system performance will be achieved by evaluating the system's maintenance history to determine whether the correct and appropriate preventative maintenance is being performed, and to revise it as necessary. Additionally, performance monitoring parameters will be identified and monitored for predicting degradation and required maintenance prior to failure.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved with a revision to PAP-1105 and performance of the engineering evaluation by December 12, 1996.

The following table identifies those actions which are considered to be regulatory commitments. Any other actions discussed in this document represent intended or planned actions, are described for the NRC's information, and are not regulatory commitments. Please notify the Manager-Regulatory Affairs at the Perry Nuclear Power Plant of any questions regarding this document or any associated regulatory commitments.

Commitment	Commitment Date
PAP-1105 will be revised to establish a hierarchy of review/approval levels that includes escalated approval for each successive/excessive PTI postponements, such that the appropriate level of management attention is achieved.	December 12, 1996
The Plant Underdrain system design will be evaluated for practical design changes that will minimize the number of components impacted by the calcium carbonate buildup effect.	December 12, 1996