



PERRY NUCLEAR POWER PLANT

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December 4, 1996
PY-CEI/NRR-2109L

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

Perry Nuclear Power Plant
Docket No. 50-440
10CFR50.54 (a)(3) Elimination of the Corporate Health Physicist Position

Ladies and Gentlemen:

The Perry Nuclear Power Plant (PNPP) intends to modify the requirements for the Corporate Health Physicist position as described in Chapter 17.2 of the Updated Safety Analysis Report. The change will eliminate this management position and transfer performance of the attendant functions to a new management position titled Radiological Assessor.

Review of this change is being requested pursuant to the provisions of 10CFR50.54 (a)(3), as it is considered to reduce the commitments in the Quality Assurance Program description previously accepted by the NRC. There are no adverse effects presented by this commitment reduction. Required performance of health physics overview and evaluation of design and operational programs remains unchanged. The new position will report directly to the General Manager, Perry Nuclear Power Plant Department (the Plant Manager).

Attachment 1 to this letter provides the details and bases for the change. Attachment 2 provides marked-up pages from the Updated Safety Analysis Report.

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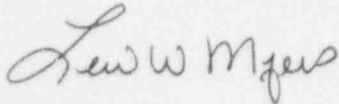
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If you have questions or require additional information, please contact
Mr. James D. Kloosterman, Manager - Regulatory Affairs, at (216) 280-5833.

Very truly yours,

A handwritten signature in cursive script, reading "Lew W. Myers".

Lew W. Myers
Vice President - Nuclear

JFP:JEE:sc

Attachments

cc: NRC Region III
NRC Resident Inspector
NRC Project Manager

Summary of the Proposed Change

This change applies to the Corporate Health Physicist position as described in the Perry Nuclear Power Plant (PNPP) Updated Safety Analysis Report (USAR) Chapter 17.2, "Quality Assurance During the Operations Phase." The function of the Corporate Health Physicist (CHP) is to provide health physics overview and evaluation of design and operational programs. The CHP reports to the Vice President, Nuclear - Perry. Under the proposed change, the CHP position is being eliminated. The attendant functions will be transferred to a new management position, titled Radiological Assessor, who will report directly to the General Manager, Perry Nuclear Power Plant Department (PNPPD). Since an established management position is being eliminated, the proposed change represents a reduction in commitment.

Details of the Proposed Change

USAR Section 17.2.1.3 describes the responsibilities and authorities of various positions having principal responsibilities associated with the Quality Assurance Program for the operation of Perry Unit 1.

The following text changes are proposed for USAR Chapter 17.2:

SECTION 17.2.1.3.2 "Vice President, Nuclear - Perry"

PAGE 17.2-3

CHANGE Delete the last paragraph of this section which reads,

"The Corporate Health Physicist (CHP) reports to the Vice President, Nuclear - Perry. The function of the CHP is to provide health physics overview and evaluations of design and operational programs."

SECTION 17.2.1.3.2.1 "Perry Departments"

PAGE 17.2-5a

CHANGE Insert the following in the bottom paragraph which outlines composition of the Perry Nuclear Power Plant Department:

"The Radiological Assessor reports to the General Manager, PNPPD. The function of the Radiological Assessor is to provide health physics overview and evaluation of design and operational programs."

Attachment 2 provides marked-up USAR pages with the above changes annotated.

Bases for the Proposed Change

The functions of independent health physics overview, and evaluation of design and operational programs continue to be required. The proposed change offers an equivalent position to perform these functions. The functions will now be

performed by a newly created position titled Radiological Assessor. The Radiological Assessor will be part of the Perry Nuclear Power Plant Department and report directly to the General Manager, PNPPD. This reporting relationship provides the necessary independence to carry out the assessment functions. Reporting to the General Manager, PNPPD versus the Vice-President, Nuclear - Perry, will improve effectiveness by directing communications to the management position which can best respond to problems identified and implement corrective actions.

The regulatory guides and ANSI standards that the Perry Nuclear Power Plant (PNPP) has committed to pertaining to organization and personnel qualifications have been reviewed. The degree of conformance for these documents is unaffected by this proposed change. The requirements of 10CFR50 Appendix B Criteria 1, "Organization" are fully maintained.

The proposed change is considered to be administrative in nature. The assessment functions remain and the reporting point is still at a senior management level. PNPP desires this change to improve the effectiveness of health physics overview. It should be noted that the incumbent CHP left the organization and the CHP position has not been filled for over three years. This condition has been documented in the PNPP Corrective Action Program.

these activities are performed in a manner consistent with the commitments of this Quality Assurance Program is delegated to the Vice President, Nuclear - Perry. The Vice President, Business Services is delegated the authority and is responsible to the Chairman, President and Chief Executive Officer for control of procurement activities performed by the organizations under his jurisdiction. The President - Power Generation is delegated the authority and is responsible for control of support services performed by the Generation Services Department.

17.2.1.3.2 Vice President, Nuclear - Perry

The Operational Quality Assurance Program for the operation of Perry is implemented under the direction of the Vice President, Nuclear - Perry. This responsibility is carried out through the Perry Nuclear Assurance Department. The Vice President, Nuclear - Perry, is directly responsible for the overall effectiveness of the Quality Assurance Program. As a part of this responsibility, the Vice President, Nuclear - Perry, assures that management reviews of the effectiveness of the QA Program in meeting the requirements of 10 CFR 50 Appendix B are conducted and documented.

The Vice President, Nuclear - Perry, provides resolution of disputes involving quality which might arise between the Perry Nuclear Assurance Department or Independent Safety Engineering Group and other departments.

The Vice President, Nuclear - Perry also exercises authority over the other departments for operations, engineering, training, and administrative services.

~~The Corporate Health Physicist (CHP) reports to the Vice President, Nuclear - Perry. The function of the CHP is to provide health physics overview and evaluations of design and operational programs.~~

- o. Providing direction and control of personnel, consultants, and suppliers as required to provide adequate support to Perry Departments in assuring timely design, analysis, purchase, fabrication and shipment, consistent with refueling outage schedules and fuel loading requirements.
- p. Developing the inservice inspection contractor, the inservice weld inspection program and technical requirements for implementation by the plant staff.
- q. Providing trained and qualified personnel to assist in performing activities on systems and components at Perry.
- r. Reviewing plant operating history (e.g., LER's, plant logs, component/system availability), and recommending actions to improve reliability, availability and maintainability.
- s. Providing staffing and support to the Independent Safety Engineering Group (ISEG).
- t. Maintaining offsite environmental and radiological monitoring programs.

Perry Nuclear Power Plant Department consists of five sections: the Perry Operations, Perry Maintenance, Site Protection, Radwaste, Environmental, and Chemistry, and Radiation Protection Sections. The responsibilities of each element are described in Section 13.1.2.2.1. Responsibility for review and coordination of their activities rests with the General Manager, PNPPD. The General Manager, PNPPD, is responsible for daily operations of the plant.

INSERT 1

"The Radiological Assessor reports to the General Manager, PNPPD.
The function of the Radiological Assessor is to provide health physics
overview and evaluation of design and operational programs."