

Docket Nos.: 50-440
and 50-441

AUG 20 1985

Mr. Murray R. Edelman, Vice President
Nuclear Operations Group
The Cleveland Electric Illuminating Company
P. O. Box 5000
Cleveland, Ohio 44101

Dear Mr. Edelman:

Subject: Perry Nuclear Power Plant (Units 1 and 2) Conformance
with Regulatory Guide 1.114

Your letter dated July 31, 1985, copy enclosed, proposed a change to Section 13.5 of the FSAR, redefining the area identified as the "operator at the controls area." The staff has reviewed the proposed change and finds it acceptable.

However, in order to fully conform to the guidance provided in Regulatory Guide 1.114, the administrative procedures developed to cover control room activities should also stipulate the control room areas that the operator may have to enter in the event of an emergency affecting the safety of operation. (This guidance is given in Section C.3 of the regulatory guide). This additional information needs to be documented in a future FSAR amendment prior to Perry Unit 1 licensing with the change provided with your July 31, 1985 letter.

Sincerely,

ORIGINAL SIGNED BY:

B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

Enclosure: As stated

cc: See next page

DISTRIBUTION:

Docket File

NRC-PDR

LPDR

NSIC

PRC System

LB#1 R/F

MRushbrook

JStefano

OELD

ACRS (16)

EJordan

JPartlow

BGrimes

HBooher

PMcLaughlin

RKnop

LB#1:DL
JStefano:kab
8/19/85

LB#1:DL
BJYoungblood
8/19/85

8508260229 850820
PDR ADOCK 05000440
F PDR

AUG 20 1985

Mr. Murray R. Edelman
The Cleveland Electric
Illuminating Company

Perry Nuclear Power Plant
Units 1 and 2

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MURRAY R. EDELMAN
VICE PRESIDENT
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July 31, 1985
PY-CEI/NRR-0296 L

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
Docket Nos. 50-440; 50-441
"Operator at the Controls"

Dear Mr. Youngblood:

This letter and its attachments are provided in response to discussions with the Region III and NRR staff concerning the Regulatory Guide 1.114 discussion of "Operator at the Controls." Proposed FSAR change pages are attached which will resolve this issue. These changes will be incorporated in a future amendment.

Please feel free to contact me if you have any further questions.

Very truly yours,

Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

Attachments

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

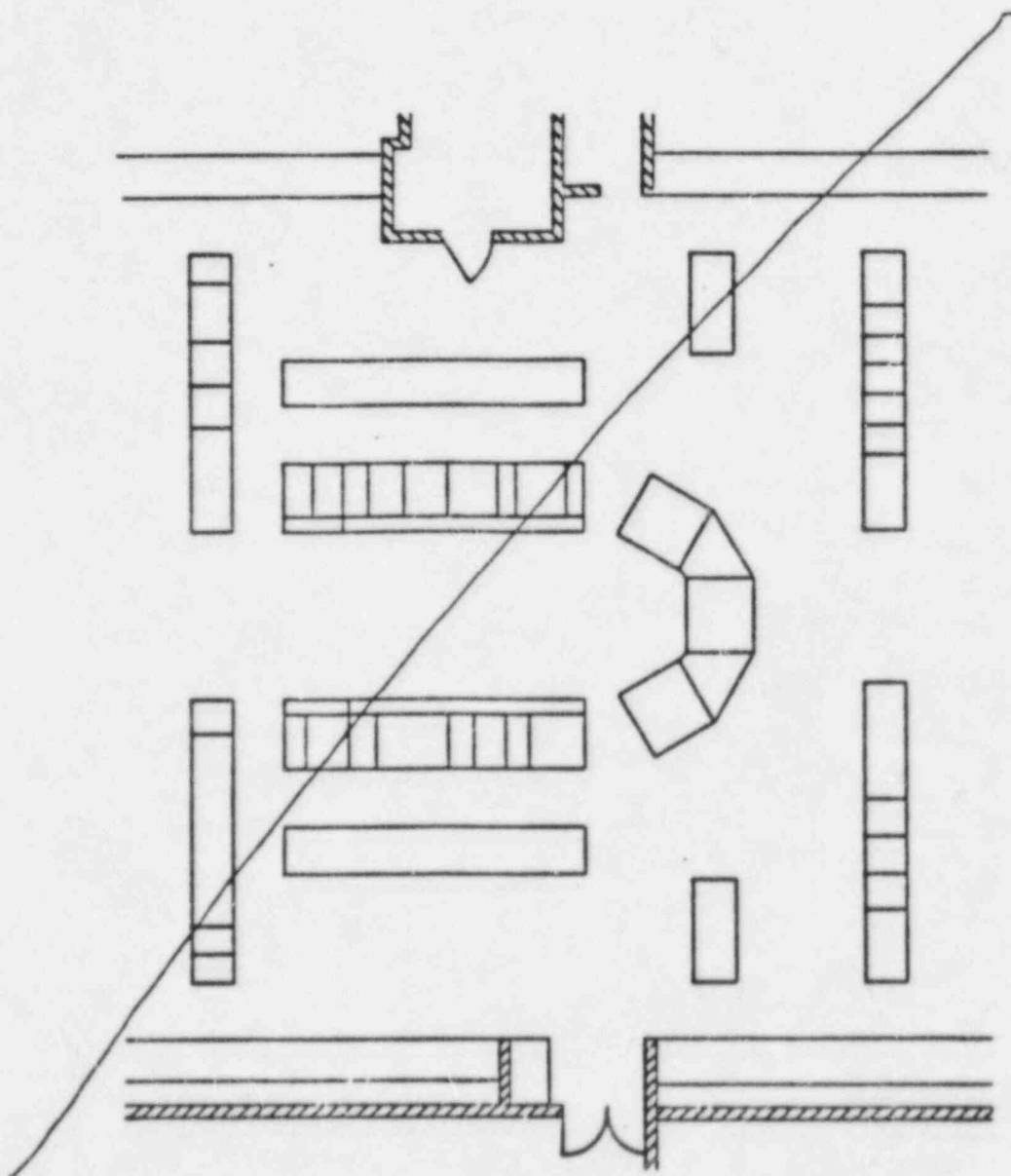
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The Plant Administrative Procedures shall be prepared under the immediate direction of the Managers, Perry Plant Operations and Technical Departments and shall be subject to their approval. These procedures are the top level documents within the "PNPP Operations Manual" and delineate the Perry Plant Operations and Technical Departments administrative and quality assurance policies and controls which implement the PNPP Operational Quality Assurance Program. They define department, section and unit responsibilities; assign authority to the section, unit and shift supervisors; and, in most cases, address activities which involve two or more Perry Plant Operations/Technical Department sections and/or units. A Plant Administrative Procedure may address only one Perry Plant Operations/Technical Department section or unit if the activity being addressed is considered exceptionally significant to the safe and efficient management of the plant.

Section Administrative Procedures shall be prepared by certain plant sections wherein the section supervisor addresses section administrative and quality assurance policies and practices and assigns specific responsibilities and authorities to section personnel. Responsibility for preparation, review and implementation of Section Administrative Procedures rests with each individual section supervisor. All Section Administrative Procedures will be subject to a PORC review prior to submittal for approval by the Operations and Technical Department Managers.

The Plant and Section Administrative Procedures are included in Volume 1 of the "PNPP Operations Manual." These administrative procedures shall address such subjects as:

1. Standing orders to operations shift supervisors and personnel including proper shift relief and turnover procedures.
2. Authority and responsibilities of reactor operators and senior reactor operators including succession in the control room.
3. Responsibility to meet licensed operator requirements as described in 10CFR50.54(i), (j), (k), (l) and (m). The area "at the controls" as discussed in the above articles of 10CFR50.54 and in the guidance in Regulatory Guide 1.114, is as shown in Figure 13.5-1 (horseshoe area).



replace Fig. 13.5-1
with figure on
next page

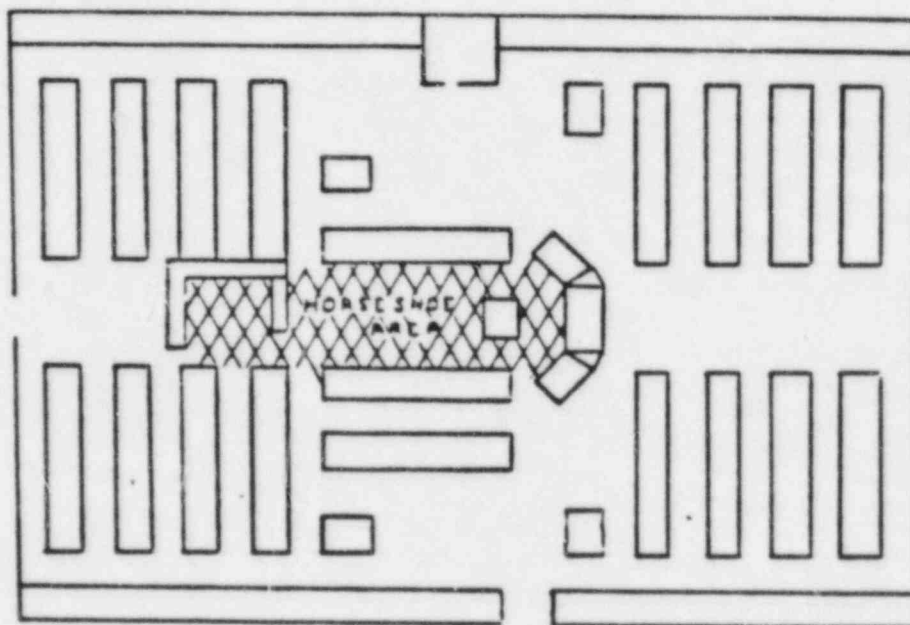
Am. 2 (5-22-81)



PERRY NUCLEAR POWER PLANT
THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY

Area Designated as "At the
Controls" (Unit 1 shown-
Unit 2 similar)

Figure 13.5-1



PERRY NUCLEAR POWER PLANT
THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY

Area Designated as "At the
Controls" (Unit 1 shown-
Unit 2 similar)

Figure 13.5-1

TABLE 1.8-1 (Continued)

<u>Regulatory Guide (Rev. 1;RRRC Category)</u>	<u>Degree of Conformance</u>	<u>Reference</u>
<u>1.113 - (Revision 1- 4/77;RRRC Cat. 1)</u>		
Estimating aquatic dispersion of effluents from accidental and routine reactor releases for the purpose of implementing Appendix I.	PNPP conforms to this guide.	2.4.12
<u>1.114 - (Revision 1 - 11/76;RRRC Cat. 3)</u>		
Guidance on being operator at the controls of a nuclear power plant.	PNPP conforms to this guide with the clarification that the horseshoe area shown on Figure 13.5-1 defines the area associated with the "Operator at the controls" concept specified in this guide.	13.5.1
<u>1.115 - Revision 1 - 8/77;RRRC Cat. 2)</u>		
Protection against low trajectory turbine missiles.	PNPP conforms to this guide.	3.5.1
<u>1.116 - (Revision 0 - 5/77;RRRC Cat.1)</u>		
Quality assurance requirements for installation, inspection and testing of mechanical equipment and systems.	See Table 1.8-2.	17.2