



**PERRY NUCLEAR POWER PLANT**

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November 12, 1996  
PY-CEI/NRR-2115L

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

Perry Nuclear Power Plant  
Docket No. 50-440  
10CFR50.54(a)(3) Organization Change for the Perry Nuclear Assurance Department  
and the Perry Training Section - Supplemental Information

Ladies and Gentlemen:

On July 23, 1996, Perry submitted letter PY-CEI/NRR-2079L, pursuant to the provisions of 10CFR50.54(a)(3), to request review of proposed changes to the Perry Nuclear Assurance Department (PNAD).

Under the proposed change, the Perry Training Section will be transferred from the Perry Nuclear Services Department (PNSD) to PNAD. Several Nuclear Quality Assurance Program responsibilities will be reassigned from the Director, PNAD to the Manager, Quality Assurance Section as a result of PNAD accepting training program responsibilities.

A telephone conference was held on October 11, 1996 between NRC and CEI staff to discuss questions regarding the submittal. Attachment 1 to this letter provides the additional information and modifications to the submittal as a result of the October 11 conversation. Attachment 2 provides the marked up USAR pages for the Chapter 17.2 changes provided in the original submittal. These pages supersede pages 11, 12, 13, 14, 16, 21, and 25 of the July 23 submittal.

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

HMC:sc

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PDR ADOCK 05000440  
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Operating Companies  
Cleveland Electric Illuminating  
Toledo Edison

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Attachments

cc: NRC Region III  
NRC Resident Inspector  
NRC Project Manager

Insert the following changes where indicated in Attachment 2 of letter  
PY-CEI/NRR-2079L:

Page 17.2-11

Part 17.2.1.3.2.2

Reassign responsibility for quality assurance training from the Director, PNAD to the Manager, QAS. Delete Director, PNAD responsibility requirement g and add it to the list of Manager, QAS responsibilities given in INSERT A to page 17.2-12.

Page 17.2-12

Part 17.2.1.3.2.2

Delete the word "experience" appended to the end of Manager, QAS qualification requirement b.

Page 17.2-13

Part 17.2.1.3.2.2

The paragraph following item d will be moved to start at the left margin.

Page 17.2-21

Part 17.2.2.3.2

Insert the following paragraph after the responsibility heading:

"The Manager, QAS maintains overall responsibility for the content and quality of the Operational QA Program as described in this chapter and shall exercise final approval authority for any changes to the QA program description prior to implementation."

Page 17.2-52

Part 17.2.13.3.3

Add the phrase "through conduct of audits" to new paragraph 17.2.13.3.3 indicating that verification of handling, storage, and shipping requirements is done through audits.

Page 17.2-57

Part 17.2.15.3.3

Add the phrase "through conduct of audits" to new paragraph 17.2.15.3.3 indicating that verification of nonconformance controls is done through audits.

- b. Provide for the review and approval of the QA program of contractors providing services, and of vendors supplying materials, parts or components covered by the scope of this document.
- c. Provide for review and approval of procedures prepared by other organizations when these procedures control or exercise an effect upon an activity that falls within the scope of this document.
- d. Provide direction and supervision of the PNAD organization.
- e. Maintain a working interface and communication with the NRC, other organizations, consultants, contractors, vendors, and others as required to effectively execute the policies presented in this description of the QA Program.
- f. Provide for a system of planned and periodic audit and inspection of organizations, contractors and vendors performing activities that fall within the scope of this document.

*DELETE* \*

~~g. Provide for a system of planned and periodic internal audit to assure the implementation of QA policies, procedures and instructions by organizations addressed in the Operational QA Program.~~

*g* ~~h. Establish and assure the continuous implementation of an indoctrination and training program for PNAD QA/QC personnel and assure that a quality assurance indoctrination is provided to appropriate personnel outside the QA organization.~~

~~i. Regularly report to the Vice President, Nuclear - Perry, the status of quality activities, and bring to his attention immediately, any significant quality-related problem or deficiency.~~

\* Re-lettering due to deleting Item g  
on p. 17.2-11

g.\* h. Provide for QA review and concurrence of safety-related plant modification and maintenance work authorizations. This includes the review of associated design documents to ensure proper review and approval, and inclusion of necessary quality assurance requirements.

h.\* i. Provide for QA review and approval of procurement documents generated for the acquisition of materials and services that fall within the scope of this document.

i.\* j. Provide for and maintain Quality Assurance records generated by PNAD until such time as they are turned over for permanent storage.

~~m. Periodically evaluate and report on the status and adequacy of the Quality Assurance Program to appropriate management.~~

j.\* k. Perform receiving inspection activities at the plant site.

k.\* l. Provide for adequate levels of inspection and surveillance of plant activities.

l.\* m. Provide the resources necessary to ensure that the Independent Safety Engineering Group can perform the activities described in Appendix 1A, Item I.B.1.2 and Section 13.4.3.

m.\* n. Provide general and procedural administrative services, document control, and records management.

n.\* o. Develop a Perry Training Program based on input and direction of the Perry departments.

Qualification requirements for the Director, PNAD, at the time are:

Manager, QAS,

a. Management experience through progressive assignment of increasing responsibility.

b. Formal degree in a science or engineering discipline or professional registration or equivalent experience.

\*DELETE

INSERT A1

INSERT A

The specific responsibilities of the Manager, QAS, include the following:

- a. Provide for a system of planned and periodic internal audits to assure the implementation of QA policies, procedures and instructions by organizations addressed in the Operational QA Program.
- b. Regularly report to the Vice President, Nuclear - Perry, the status of quality activities, and bring to his attention immediately, any significant quality-related problem or deficiency.
- e. Periodically evaluate and report on the status and adequacy of the Quality Assurance Program to appropriate management.
- d. Initiating stop work, or control further processing, delivery, or installation of nonconforming material or activity as described in the applicable quality assurance procedures and instructions and in the applicable plant procedures and instructions.
- e. Establish and assure the continuous implementation of an indoctrination and training program for PNAD QA/QC personnel and assure that a quality assurance indoctrination is provided to appropriate personnel outside the QA organization.

\* ADD



plant experience in the overall implementation of the Quality Assurance Program. A minimum of 1 year of this 6 years experience shall be related technical or academic training. A maximum of 4 years experience may be fulfilled by related technical or academic training.

d. Training in QA policies, standards, regulations, and practices.

\* Align with left margin  
← The Director, PNAD, is assisted in carrying out his responsibilities by a staff organized into sections to provide adequate coverage of procurement, manufacturing, inservice inspection, refueling, maintenance, repair, modification, and operation of Perry (Figure 17.2-2). The staff includes required expertise to perform audit, quality engineering, surveillance, and inspection functions. In addition, quality assurance agents may be engaged to augment the PNAD staff. PNAD shall maintain direct control over any quality assurance agent.

17.2.1.3.2.2.1 Manager, Quality Assurance Section

✓  
The Manager, Quality Assurance Section, is responsible for implementing a system of planned periodic internal audits and surveillances. Section activities include input to and review of procedures and corrective action programs; reviewing changes to the Operations QA Plan; surveillance of plant operations; and providing administrative support for PNAD.

17.2.1.3.2.2.2 Manager, Quality Control Section.

The Manager, Quality Control Section, is responsible for review and approval of procurement documents; maintains a program for approval, audit and surveillance of suppliers; and

{ has overall responsibility for verifying the effective implementation of the Quality Assurance Program. He

Any corrective action which may be deemed necessary, as a result of these yearly assessments, shall be formally identified and tracked to resolution.

17.2.2.3.2

*Manager, Quality Assurance Section (QAS)*  
~~Director, Perry Nuclear Assurance Department (PNAD)~~

\*  
INSERT → *manager, QAS,*

The ~~Director, PNAD~~, as the official given direct responsibility for verifying the effective implementation of the Perry Operational QA Program, shall establish and implement a formally documented and procedurally controlled program to evaluate and report to the Vice President, Nuclear - Perry on the adequacy and continued effectiveness of the overall Perry OQA Program. Reports of audits performed by PNAD or their agents, and quality trend analysis will provide the basis for this evaluation. Corrective action shall be implemented by responsible management, as deemed appropriate, when analysis reveals adverse quality trends. These actions may involve specific actions to provide compliance with the QA Program, and may include follow-up audits or revision to the OQA Program. Implementation and close-out of corrective actions shall be monitored by the ~~Director, PNAD~~, to assure timely correction and compliance. *Manager, QAS,*

17.2.2.3.3 Director/General Manager of Each Organization

The Director/General Manager of each organization is responsible for implementing training and indoctrination programs for their respective organizations which meet the requirements in Section 17.2.2.2., Item g.

17.2.2.4 Delegated Authorities

Quality assurance programs and implementing procedures for suppliers or contractors providing materials and services for Perry which are covered under the scope of this QA Program shall be subject to review and acceptance by PNAD prior to the commencement of any activity covered under the scope of this QA Program. Procurement documents shall



\* INSERT AT THE BEGINNING OF SECTION 17.2.2.3.2

The Manager, QAS maintains overall responsibility for the content and quality of the Operational QA Program as described in this chapter and shall exercise final approval authority for any changes prior to implementation.

17.2.13.3.2 Director, Perry Nuclear Assurance Department

The Director, PNAD, is responsible for receipt inspection verification of special handling and packaging maintenance during shipment, and conducting inspections ~~and audits~~ to verify the implementation of handling, storage and shipping requirements.

17.2.14 INSPECTION, TEST AND OPERATING STATUS

17.2.14.1 Policy

A program shall be established to indicate the inspection, test and operating status of structures, systems and components covered under the scope of this document.

The status of safety-related structures, systems and components shall be controlled in accordance with approved procedures. These procedures shall include the use of appropriate tags, markings, lists, logs, diagrams, or other suitable means, to assure that required inspections and tests are satisfactorily completed to prevent inadvertent bypassing of required inspections and tests and to prevent inadvertent operation.

17.2.14.2 Requirements

\* Through conduct of audits. ADD

An acceptable inspection, test and operating status program shall include:

- a. The identification of inspection, test and operating status of structures, systems and components.
- b. Procedures which include controls for the application and removal of inspection and welding stamps, and other status indicators such as tags, markings, labels, and stamps.

17.2.13.3.3 Manager, Quality Assurance Section  
The Manager, QAS, shall verify the implementation of  
handling, storage and shipping requirements

17.2-52

Revision 3  
March, 1991

~~facilities of vendors and contractors.~~ The Director, PNAD, is responsible for the performance and reporting of periodic quality trend analysis of nonconformances.

17.2.16 CORRECTIVE ACTION

17.2.16.1 Policy

Measures shall be established which ensure that conditions adverse to quality, such as malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances be identified promptly and corrected. The cause of significant conditions adverse to quality shall be determined and corrective action shall be taken to preclude repetition. The identification, cause and actions taken to correct conditions adverse to quality shall be documented and reported to the appropriate levels of management.

Significant conditions as delineated in 10 CFR 50.72 or 10 CFR 21 shall be reported to appropriate management levels within the affected organization.

17.2.16.2 Requirements

Procedures shall be established which detail and implement at least the following corrective action system measures:

- a. Conditions adverse to quality shall be corrected and shall be evaluated as to the significance of the condition.
- b. Significant conditions adverse to quality shall have action taken to prevent recurrence.

17.2.15.3.3 Manager, Quality Assurance Section

the Manager, QAS, shall verify the adequate implementation of nonconformance control both at the plant and in the facilities of vendors and contractors through conduct of audits.

Revision 7  
March, 1995

ADD\*