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MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

September 4, 1985
PY-CEI/OIE-0107 L

Mr. R. R. Warnick, Chief
Projects Branch 1
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
50-440/85033 Noncompliance Response

Dear Mr. Warnick:

This letter is to acknowledge receipt of Inspection Report 50-440/85033 attached to your letter dated August 5, 1985. This report identifies areas examined by Messrs. J. A. Grobe and J. P. Brown, Jr. during their inspection conducted June 3 through July 8, 1985 at the Perry Nuclear Power Plant.

Attached to this letter is our response to the Notice of Violation dated August 5, 1985. This response is in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations.

Our response has been submitted to you within thirty days of the date of the Notice of Violation as you requested. If there are additional questions, please do not hesitate to call.

Very truly yours,

Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

Attachment

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PDR ADOCK 05000440
Q PDR

SEP 6 1985

Mr. R. F. Warnick

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September 4, 1985
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cc: Mr. J. A. Grobe
USNRC Site, SBB50

Mr. D. E. Keating
USNRC Site, SBB50

Mr. K. A. Connaughton
USNRC Site, SBB50

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

RESPONSE TO NONCOMPLIANCE
50-440/85033

10 CFR 50, Appendix B, Criterion V as implemented by the applicant's Corporate Nuclear Quality Assurance Program, Section 0500, Revision 6, requires that activities affecting quality be prescribed by and accomplished in accordance with documented procedures. Administrative procedure PA-0206, Revision 5, "Housekeeping", requires that floor plans be developed designating housekeeping zones for plant areas. Those floor plans designate that the reactor vessel and B pool were Zone III areas which require material accountability.

Contrary to the above, no procedures were written to control materials in the reactor vessel and B pool. Material accountability activities were specified in a memorandum. In addition, the specified material control measures were not implemented on June 22, 1985 when the inspector observed materials (e.g., reactor vessel stud protectors) had not been logged out of the reactor vessel area prior to flood-up and full flow low pressure coolant injection testing.

This is a Severity Level V violation (Supplement III).

Corrective Action Taken and Results Achieved

During the period of inspection discussed in the notice of violation, the reactor vessel head was removed to perform preoperational tests 1B13-P-001, 1F14-P-001, and 1F15-P-001.

In an effort for plant personnel to gain experience in the implementation of area housekeeping and access controls, the responsibility for controlling the Unit 1 refueling floor was transferred from Nuclear Construction Department (NCD) to Perry Plant Technical Department (PPTD) through generation of Work Authorization NTS 85-7434. Work Order 85-02239 was generated to provide Temporary Work Instructions for access control and material accountability for the reactor vessel and B pool areas.

On June 22, 1985, the NRC Resident Inspector expressed concern with the implementation of material accountability in the area of the B pool and reactor vessel. In response to this concern, the following actions were implemented:

- o Increase the field of view for the security officers in the area and increase the number of security officers on duty at all times.
- o Inform all levels of Project Management of the need for increased awareness and proper implementation of controls, including disciplinary action as necessary to insure compliance.

The B pool was inspected for cleanliness on 6/19/85 prior to filling the upper pools, and documented on a Precleaning Data Sheet. On 6/28/85, the next time the pools were drained, an examination for material and items in the area of the B pool and refueling/auxiliary platforms was performed by NCD and Security. The items present were re-inventoried, providing a new baseline for the item/material log sheets.

Once these actions were completed, material accountability and personnel access controls were satisfactorily accomplished for the RPV, B pool and platform areas. WA NTS 85-7434 and WO 85-02239 were closed after the vessel head was re-installed to support SIT. All materials, tools and other items were retrieved and accounted for in the log.

Corrective Action Taken to Avoid Future Noncompliance

Prior to reopening the refueling floor after SIT/ILRT, the entire refueling floor was designated as a Zone III. The cleanliness requirements for the refueling floor are specified by procedure PA-0206 "Housekeeping", Revision 5. Procedure NEDP 3-0801 "Reactor Pressure Vessel/Restricted Area Access Control" Revision 3 was utilized to control material and personnel access. PA-0111 "Unit 1 Refueling Floor Access Control" was written which incorporates the requirements from NEDP 3-0801 and the portions of PA-0206 concerning zone designation and personnel-material accountability. PA-0111 provides the necessary control measures to implement the PA-0206 requirements and is now used on the Unit 1 refueling floor.

Procedure PA-0111 offers a number of improvements to control personnel access and material accountability. These improvements include the following:

- o Personnel taking material onto the refueling floor now must assume the responsibility for removing the material by the end of his/her shift or have the material entered on the Long Term Tool-Material Inventory Log.
- o The procedure clearly defines the authority and responsibility of the security officers to deny access to anyone who willfully or repeatedly fails to follow procedural requirements.
- o Procedure PA-0111 provides access control to the entire refueling floor where the previous procedures only controlled the B pool area.
- o This procedure assigns the responsibility for procedural compliance to the individual.

Training in the requirements of PA-0111 has been provided to the appropriate Engineers, Security Personnel and Job Supervisors. In addition, continuous OQS surveillance of the implementation of these requirements on the refueling floor was instituted. This surveillance continued until CEI management had adequate assurance that the requirements are being consistently implemented.

The collective actions described herein will reduce the chances of additional problems through the more definite control established and the clearer lines of responsibility afforded through a Project Administration level procedure.

Date Full Compliance Will Be Achieved

Full compliance has been achieved.