



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 97 ■ PERRY, OHIO 44081 ■ TELEPHONE (216) 259-3737 ■ ADDRESS-10 CENTER ROAD

Serving The Best Location in the Nation
PERRY NUCLEAR POWER PLANT

Al Kaplan

VICE PRESIDENT
NUCLEAR GROUP

March 3, 1988
PY-CEI/NRR-0809 L

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

Perry Nuclear Power Plant
Docket No. 50-440
Response to Notice of
Violation 50-440/87023-06

Dear Gentlemen:

This letter acknowledges receipt of the Notice of Violation contained within Inspection Report 50-440/87023 dated February 2, 1988. The report identified areas examined by Messrs. K.A. Connaughton and G.F. O'Dwyer during their inspection conducted from October 20 through December 30, 1987 of activities at the Perry Nuclear Power Plant, Unit 1.

Our response to Notice of Violation 50-440/87023-06 is attached. Please feel free to contact me should you have any additional questions.

Very truly yours,

Al Kaplan
Vice President
Nuclear Group

AK:cab

Attachment

cc: T. Colburn
K. Connaughton
USNRC, Region III

IEO1
11

50-440/87023-06

Restatement of the Violation

Technical Specification 3.3.1 requires, in part, that with the number of operable intermediate range neutron monitoring (IRM) system channels less than required by the minimum operable channels per trip system requirement for one trip system, place the inoperable channels and/or that trip system in the tripped condition within one hour.

Contrary to the above, on July 3, 4 and 5, 1987, while in Operational Condition 4, the minimum operable channels per trip system requirements for one trip system were not met for periods in excess of one hour while neither the inoperable channels nor the associated trip system were placed in a tripped condition.

This is a Severity Level IV violation (Supplement 1).

Background of Event

The root cause of these events was personnel inattention to detail. Contributing to the errors on July 3 and July 4 were the IRM calibration Surveillance Instructions (SVI) approaching their late date. Concerned that if the SVI's exceeded the late date the associated IRM channel would have to be declared inoperable, the operators chose to perform the SVI's even though the Technical Specification time limit would be exceeded. They believed that the intent of Technical Specifications was not to prevent the performance of surveillances required for system operability. Investigation determined that these SVI's were not due nor required to be performed in Cold Shutdown, the existing plant Operational Condition. On July 5, IRM Channel C was bypassed with the intent to return it to normal following installation of measuring and test equipment to monitor channel behavior. Due to oversight, the operator failed to return the channel to normal or place the inoperable channels in a tripped condition until an oncoming crew noticed the error.

Corrective Actions Taken and Results Achieved

As a result of the July 3 and July 4 events, the IRM calibration SVI's were revised to provide clarification on the frequency requirements for their performance. The operators involved in all of these events have been counseled and all shift operations personnel were trained on the interpretation of Technical Specification requirements associated with instrumentation including Operational Condition requirements. The change to the SVI's were also discussed.

Corrective Action Taken to Avoid Further Violations

The actions taken as stated above are sufficient to prevent recurrence of this violation. Additionally, enhancements have been made to the existing licensed operator Technical Specification Lesson Plans in our continued efforts to ensure Technical Specification compliance. Case studies from Perry and industry experience have been developed for incorporation into the initial and requalification licensed operator training programs to provide specific training in Technical Specification decision making.

Date of Full Compliance

Full compliance was achieved September 23, 1987 upon revision of the IRM calibration SVI's.