

March 31, 2000

Mr. John K. Wood
Vice President - Nuclear
FirstEnergy Nuclear Operating Company
P.O. Box 97, A200
Perry, OH 44081

SUBJECT: PLANT PERFORMANCE REVIEW - PERRY

Dear Mr. Wood:

The purpose of this letter is to communicate our assessment of your performance and to inform you of our planned inspections at your facility. On March 7, 2000, we completed a Plant Performance Review (PPR) of the Perry Nuclear Power Plant. We conduct these reviews to develop an integrated overview of the safety performance of each operating nuclear power plant. We use the results of the PPR in planning and allocating inspection resources and as inputs to our senior management meeting (SMM) process. This PPR evaluated inspection results and safety performance information for the period from February 1, 1999 through January 31, 2000, but emphasized the last 6 months to ensure that our assessment reflected your current performance. Our most recent summary of plant performance was provided to Mr. Lew W. Myers in a letter dated March 26, 1999.

The NRC has been developing a revised reactor oversight process that will replace our existing inspection and assessment processes, including the PPR, the SMM, and the Systematic Assessment of Licensee Performance (SALP). We recently completed a pilot program for the revised reactor oversight process at nine participating sites and are making necessary adjustments based on feedback and lessons learned. We plan to begin initial implementation of the revised reactor oversight process industry-wide, including your facility, on April 2, 2000.

This PPR reflects continued process improvements as we make the transition into the revised reactor oversight process. You will notice that the following summary of plant performance is organized differently from our previous performance summaries. Instead of characterizing our assessment results by SALP functional area, we are organizing the results into the strategic performance areas embodied in the revised reactor oversight process. In addition, we have considered the historical performance indicator data that you submitted in January 2000 in conjunction with the inspection results in assessing your performance. The results of this PPR were used to establish the inspection plan in accordance with the new risk-informed inspection program (consisting of baseline and supplemental inspections). Although this letter incorporates some terms and concepts associated with the new oversight process, it does not reflect the much broader changes in inspection and assessment that will be evident after we have fully implemented our revised reactor oversight process.

During the last 6 months, Perry was typically operated at or near full power with only a few minor challenges to plant operators. Planned power reductions were conducted for scram time testing and/or control rod sequence exchanges on several occasions. In addition, power was reduced to 65 percent for the identification and suppression of a minor fuel defect in January 2000. We have not identified any significant performance issues during this assessment period and note that Perry continues to operate in a safe manner. Therefore, with the exception of a planned Operational Safeguards Response Evaluation, we plan to conduct only baseline inspections at your facility as noted in the enclosed inspection plan.

In the reactor safety and radiation safety strategic areas, we did not identify any significant performance issues. However, isolated weaknesses in occupational exposure controls led to three high radiation area occurrences during 1999. Only baseline inspections are planned in these strategic areas.

We did not identify any significant performance issues in the safeguards strategic area. In addition to the planned baseline inspections, an Operational Safeguards Response Evaluation (OSRE) was scheduled based upon the time since the last OSRE was conducted. We will continue with OSRE inspections until the industry proposed Self Assessment Program (SAP) is approved by the NRC staff as an acceptable substitute for the OSRE inspections.

Enclosure 1 contains a historical listing of plant issues, referred to as the Plant Issues Matrix (PIM), that were used during this PPR process to arrive at our integrated view of your performance trends. The PIM for this assessment is grouped by the prior SALP functional areas of operations, maintenance, engineering and plant support, although the future PIM will be organized along the cornerstones of safety as described in the revised reactor oversight process. The enclosed PIM includes items summarized from inspection reports or other docketed correspondence regarding Perry. We did not document all aspects of your programs and performance that may be functioning appropriately. Rather, we only documented issues that we believe warrant management attention or represent noteworthy aspects of performance. In addition, the PPR may also have considered some predecisional and draft material that does not appear in the enclosed PIM, including observations from events and inspections that had occurred since our last inspection report was issued, but had not yet received full review and consideration. We will make this material publically available as part of the normal issuance of our inspection reports and other correspondence.

Enclosure 2 lists our planned inspections for the period April 2, 2000 through March 31, 2001, to allow you to resolve scheduling conflicts and personnel availability in advance of our inspector arrival on site. The inspection schedule for the latter half of the period is more tentative and may be adjusted in the future due to emerging performance issues at Perry or other Region III facilities. Routine resident inspections are not listed due to their ongoing and continuous nature.

J. Wood

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We will inform you of any changes to the inspection plan. If you have any questions, please contact me at 630/829-9866.

Sincerely,

/RA/

Thomas J. Kozak, Chief
Reactor Projects Branch 4
Division of Reactor Projects

Docket No. 50-440
License No. NPF-58

Enclosures: 1. Plant Issues Matrix
2. Inspection Plan

See Attached Distribution

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