

February 26, 2001

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

SUBJECT: PERRY NUCLEAR POWER PLANT - NRC INSPECTION REPORT
50-440/01-03(DRS)

Dear Mr. Wood:

On February 8, 2001, the NRC completed an inspection at your Perry Nuclear Power Plant. The enclosed report documents the inspection findings which were discussed on February 8, 2001, with Mr. Bonner and other members of your staff.

The inspection was an examination of activities conducted under your license as they relate to emergency preparedness and to compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel. Specifically, this inspection focused on the implementation of your emergency preparedness program. In addition, we reviewed your staff's evaluation of the performance indicators for the Emergency Preparedness Cornerstone.

No findings of significance were identified.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Sincerely,

/RA by John E. House Acting for/

Gary L. Shear, Chief
Plant Support Branch
Division of Reactor Safety

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

Enclosure: Inspection Report 50-440/01-03(DRS)

See Attached Distribution

cc w/encl: B. Saunders, President - FENOC
N. Bonner, Director, Nuclear
Maintenance Department
G. Dunn, Manager, Regulatory Affairs
K. Ostrowski, Director, Nuclear
Services Department
T. Rausch, Director, Nuclear
Engineering Department
R. Schrauder, General Manager,
Nuclear Power Plant Department
A. Schriber, Chairman, Ohio Public
Utilities Commission
Ohio State Liaison Officer
R. Owen, Ohio Department of Health

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

SUBJECT: PERRY NUCLEAR POWER PLANT - NRC INSPECTION REPORT
 50-440/01-03(DRS)

Dear Mr. Wood:

On February 8, 2001, the NRC completed an inspection at your Perry Nuclear Power Plant. The enclosed report documents the inspection findings which were discussed on February 8, 2001, with Mr. Bonner and other members of your staff.

The inspection was an examination of activities conducted under your license as they relate to emergency preparedness and to compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel. Specifically, this inspection focused on the implementation of your emergency preparedness program. In addition, we reviewed your staff's evaluation of the performance indicators for the Emergency Preparedness Cornerstone. No findings of significance were identified.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Sincerely,

/RA by John E. House Acting for/

Gary L. Shear, Chief
 Plant Support Branch, Division of Reactor Safety

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

Enclosure: Inspection Report 50-440/01-03(DRS)

See Attached Distribution

DOCUMENT NAME: G:DRS\PER01-03DRS.wpd

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	RIII	RIII	RIII	
NAME	RJickling:jb	LCollins for TKozak	JHouse for GShear	
DATE	02/21/01	02/23/01	02/26/01	

OFFICIAL RECORD COPY

cc w/encl: B. Saunders, President - FENOC
N. Bonner, Director, Nuclear
Maintenance Department
G. Dunn, Manager, Regulatory Affairs
K. Ostrowski, Director, Nuclear
Services Department
T. Rausch, Director, Nuclear
Engineering Department
R. Schrauder, General Manager,
Nuclear Power Plant Department
A. Schriber, Chairman, Ohio Public
Utilities Commission
Ohio State Liaison Officer
R. Owen, Ohio Department of Health

ADAMS Distribution:

DFT
DVP1 (Project Mgr.)
J. Caldwell, RIII
G. Grant, RIII
B. Clayton, RIII
C. Ariano (hard copy)
DRPIII
DRSIII
PLB1
JRK1
BAH3

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

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

Report No: 50-440/01-03(DRS)

Licensee: FirstEnergy Nuclear Operating Company

Facility: Perry Nuclear Power Plant

Location: P. O. Box 97, A200
Perry, OH 44081

Dates: February 5 - 8, 2001

Inspector: Robert D. Jickling,
Emergency Preparedness Analyst

Approved by: Gary L. Shear, Chief
Plant Support Branch
Division of Reactor Safety

NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas) reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

Reactor Safety

- Initiating Events
- Mitigating Systems
- Barrier Integrity
- Emergency Preparedness

Radiation Safety

- Occupational
- Public

Safeguards

- Physical Protection

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: <http://www.nrc.gov/NRR/OVERSIGHT/index.html>.

SUMMARY OF FINDINGS

IR 05000440-01-03(DRS), on 02/05-08/2001, First Energy Nuclear Operating Company, Perry Nuclear Power Plant. Emergency Preparedness.

The report covers a one week period of announced inspection by a regional emergency preparedness inspector. No findings of significance were identified.

Report Details

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP2 Alert and Notification System (ANS) Testing

a. Inspection Scope

The inspector discussed with Emergency Preparedness (EP) staff the design, equipment, and periodic testing of the public ANS for the Perry Nuclear Power Plant Emergency Planning Zone (EPZ) to verify that the system was properly tested and maintained. The inspector also reviewed procedures and records for the 24 month period ending December 2000 related to ANS testing, annual preventive maintenance, and non-scheduled maintenance. The inspector reviewed the licensee's criteria for determining whether each model of siren installed in the EPZ would perform as expected if fully activated. Records used to document and trend component failures for each model of installed siren were also reviewed to ensure that corrective actions were taken for test failures or system anomalies.

b. Findings

No findings of significance were identified.

1EP3 Emergency Response Organization (ERO) Augmentation Testing

a. Inspection Scope

The inspector reviewed the licensee's ERO augmentation testing to verify that the licensee maintained and tested its ability to staff the ERO during an emergency in a timely manner. Specifically, the inspector reviewed semi-annual, off-hours staff augmentation drill procedures, related years 1999 and 2000 drill records, primary and backup provisions for off-hours notification of the Perry Plant's emergency responders and the current ERO roster for the plant. The inspector reviewed and discussed the EP staffs' provisions for maintaining the Emergency Response Telephone Directory.

b. Findings

No findings of significance were identified.

1EP5 Correction of Emergency Preparedness Weaknesses and Deficiencies

a. Inspection Scope

The inspector reviewed and discussed Nuclear Quality Assessment staffs' 1999 and 2000 audits and the EP Unit staff's 2000 self-assessment report to ensure that these audits complied with the requirements of 10 CFR Part 50.54(t) and that the licensee adequately identifies and corrects deficiencies. The inspector also reviewed a sample

of Condition Reports (CR) related to the Plant's EP program in order to determine whether related corrective actions were acceptably completed as indicated.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator (PI) Verification

a. Inspection Scope

The inspector verified that the licensee had accurately reported the performance indicators: Alert Notification System (ANS), Emergency Response Organization (ERO) Drill Participation, and Drill and Exercise Performance (DEP), for the emergency preparedness cornerstone. Specifically, the inspector reviewed the licensee's PI records, data reported to the NRC, and condition reports for the 1999 and 2000 calendar years to identify any occurrences that were not identified by the licensee. Records of relevant Control Room Simulator training sessions, periodic ANS tests, and excerpts of drill and exercise evaluations were also reviewed.

b. Findings

No findings of significance were identified.

4OA6 Management Meetings

Exit Meeting Summary

The inspector presented the preliminary inspection results to Mr. N. Bonner and other members of licensee management and staff on February 8, 2001. The licensee acknowledged the information presented and did not identify any information discussed as proprietary.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

- D. Bauguess, Emergency Onsite Coordinator
- N. Bonner, Director-Perry Nuclear Engineering
- D. Cleavenger, Emergency Preparedness Planner
- R. Collings, Training and Emergency Planning Manager
- M. Ginn, Emergency Preparedness Planner
- D. Gudger, Compliance Unit Supervisor
- H. Hegrat, Quality Assurance Manager
- V. Higaki, Emergency Preparedness Supervisor
- K. Ostrowski, Director-Plant Nuclear Services Department
- G. Rhoads, Nuclear Quality Assurance Supervisor
- B. Schrauder, General Manager Perry Nuclear Power Plant
- L. Sosler, Emergency Preparedness Planner
- J. Wood, Vice President Nuclear

State of Ohio

- E. Edwards, Ohio Emergency Management Agency Radiation Analyst

NRC

- C. Lipa, Senior Resident Inspector
- R. Vogt-Lowell, Resident Inspector

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

None

Discussed

None

LIST OF ACRONYMS USED

ANS	Alert and Notification System
CR	Condition Report
DEP	Drill and Exercise Performance
DRS	Division of Reactor Safety
EP	Emergency Preparedness
EPZ	Emergency Planning Zone
ERO	Emergency Response Organization
NRC	Nuclear Regulatory Commission
PI	Performance Indicator

LIST OF DOCUMENTS REVIEWED

Assessments and Audits

PA 00-06, Emergency Preparedness Audit No. PA 00-06
PA 99-05, Emergency Preparedness Audit No. PA 99-05
Self-Assessment 261PTS2000 Emergency Preparedness Evaluated Exercise
Self-Assessment 262PTS2000 Emergency Response Organization Training Drill
Self-Assessment 263-PTS 2000 Evaluation Report

Miscellaneous

Perry Nuclear Power Plant Emergency Plan
BBN Laboratories, Inc. Report No. 5113, "The Siren Alerting System For The Perry Nuclear Power Plant"
FEMA Letter, September 8, 1986, Regarding the Alert and Notification System Adequacy Perry Policy and Practices Tech 1, "Emergency Response Organization (ERO) Participation and Response"
Standard Operating Procedure For An Emergency At The Perry Nuclear Power Plant, dated January 26, 2000. "Siren Activation"
1999 and 2000 Prompt Alert Siren System Maintenance Report
Site Trainee and Requirements Tracking (START) System, dated February 6, 2001
Emergency Response Telephone Directory, Revision 2000-4
2000 Evaluated Exercise Scenario
2000 Practice Exercise Scenario

Condition Reports (CR)

PIF 98-0202, CR 98-0476, CR 98-1437, CR 99-0632, CR 99-0633, CR 99-0634, CR 99-0635, CR 00-0891, CR 00-0892, CR 00-0893, CR 00-0917, CR 00-0937, CR 00-1101, CR 00-1173, CR 00-2225, CR 00-2417, CR 00-2418, CR 00-2421, CR 00-2936

Procedures

NEI-0951, Revision 3, PIC 3, "Prompt Alert System"
NOP-LP-2001, Revision 1, "Condition Report Process"
PTI-GEN-P0003, March 21, 1999, "Test Performance"
SPI-0032, Revision 6, PIC 4, "Notification of Key Plant Personnel"
TMP-2302, Revision 2, PIC 3, "Emergency Plan Training Program"