

October 27, 2004

Mr. Lew W. Myers
Chief Operating Officer
FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant
P. O. Box 97, A290
10 Center Road
Perry, OH 44081

SUBJECT: PERRY NUCLEAR POWER PLANT
NRC EMERGENCY PREPAREDNESS INSPECTION REPORT
NO. 05000440/2004014(DRS)

Dear Mr. Myers:

On October 8, 2004, the NRC completed an inspection at your Perry Nuclear Power Plant. The enclosed report documents the inspection findings, which were discussed on October 8, 2004, with Mr. F. von Ahn and members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. Specifically, this inspection focused on emergency preparedness, including your staff's determinations of performance indicators for the Emergency Preparedness Cornerstone.

On the basis of the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR Part 2.390 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/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Kenneth Riemer, Chief
Plant Support Branch
Division of Reactor Safety

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

Enclosure: Inspection Report 05000440/2004014(DRS)

See Attached Distribution

L. Myers

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cc w/encl: G. Leidich, President - FENOC
J. Hagan, Senior Vice President Engineering
and Services, FENOC
W. O'Malley, Director, Maintenance Department
V. Higaki, Manager, Regulatory Affairs
J. Messina, Director, Nuclear
Services Department
T. Lentz, Director, Nuclear
Engineering Department
F. von Ahn, Plant Manager,
Nuclear Power Plant Department
M. O'Reilly, Attorney, FirstEnergy
Public Utilities Commission of Ohio
Ohio State Liaison Officer
R. Owen, Ohio Department of Health

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

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

Report No: 05000440/2004014(DRS)

Licensee: FirstEnergy Nuclear Operating Company

Facility: Perry Nuclear Power Plant

Location: 10 Center Road
Perry, OH 44081

Dates: October 4 through October 8, 2004

Inspectors: T. Ploski, Senior Emergency Preparedness Inspector
R. Jickling, Emergency Preparedness Inspector
J. Rutkowski, Resident Inspector
R. Smith, Reactor Engineer

Observers: G. Roach, Reactor Engineer
G. Armstrong, Engineer

Approved by: K. Riemer, Chief
Plant Support Branch
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000440/2004014(DRS); 10/04/2004 - 10/08/2004; Perry Nuclear Power Plant; Emergency Preparedness Specialist Report.

The report covers a one-week baseline inspection by two regional emergency preparedness inspectors, a resident inspector, and a reactor engineer. The inspection focused on the Emergency Preparedness Cornerstone in the Reactor Safety strategic performance area during the biennial emergency preparedness exercise. This inspection also included a review of records related to the three emergency preparedness performance indicators for the period from January 2003 through June 2004. No findings of significance were identified.

The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

A. Inspector-Identified and Self-Revealed Findings

None.

B. Licensee-Identified Violations

None.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP1 Exercise Evaluation (71114.01)

a. Inspection Scope

The inspectors reviewed the October 5, 2004, biennial emergency preparedness exercise's objectives and scenario to ensure that the exercise would acceptably test major elements of the licensee's radiological emergency plan and to verify that the exercise's simulated problems provided an acceptable framework to support demonstration of the licensee's capability to implement its plan. The inspectors also reviewed records of nine emergency preparedness drills, which were conducted from May 2002 through September 2004, to determine whether the scenarios used in those drills were sufficiently different from the scenario used in the October 5, 2004, exercise.

The inspectors evaluated the licensee's exercise performance, focusing on the risk-significant activities of emergency classification, notification, and protective action decision making, as well as implementation of accident mitigation strategies in the following emergency response facilities:

- Control Room Simulator;
- Technical Support Center (TSC);
- Operations Support Center (OSC); and
- Emergency Operations Facility (EOF).

The inspectors also assessed the licensee's recognition of abnormal plant conditions, transfer of responsibilities between facilities, internal communications, interfaces with offsite officials, readiness of emergency facilities and related equipment, and overall implementation of the licensee's emergency plan.

The inspectors attended post-exercise critiques in the TSC, OSC, and EOF to evaluate the licensee's initial self-assessment of its exercise performance. The inspectors later met with the licensee's lead exercise evaluators to obtain the licensee's refined assessments of its exercise participants' performances. These self-assessments were then compared with the inspectors' independent observations and assessments to determine the licensee's ability to adequately critique its exercise performance.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator (PI) Verification (71151)

a. Inspection Scope

The inspectors reviewed the licensee's records associated with each of the three emergency preparedness PIs to verify that the licensee's program was implemented consistent with the industry guidelines in Nuclear Energy Institute publication No. 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 2, and related licensee procedures. Specifically, licensee records related to the performance of the Alert and Notification System (ANS), key Emergency Response Organization (ERO) members' drill participation, and Drill and Exercise Performance (DEP) were reviewed to verify the accuracy and completeness of the PI data submitted to NRC for the period from January 2003 through June 2004. The following PIs were reviewed:

- ANS,
- ERO Drill Participation, and
- DEP.

b. Findings

No findings of significance were identified.

4OA6 Meetings

.1 Exit Meeting

An exit meeting was conducted for Emergency Preparedness with Mr. F. von Ahn and other members of licensee management and staff at the conclusion of the inspection on October 8, 2004. The licensee acknowledged the information presented. No proprietary information was identified.

.2 Public and Media Briefing

On October 8, 2004, an inspector summarized the NRC's preliminary conclusions on the licensee's exercise and critique performances at a public and media briefing hosted by Federal Emergency Management Agency, Region V staff in Mentor, Ohio.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

G. Bell, Onsite Emergency Planner
N. Bonner, Manager
P. Bordley, Superintendent, Operations
L. Burgwald, Onsite Emergency Planner
K. Cimorelli, Manager
D. Cleavenger, Onsite Emergency Planner
J. Duffield, Manager, Training
J. Heintz, Quality Assurance Supervisor
T. Henderson, Supervisor, Emergency Planning Unit
V. Higaki, Manager, Emergency Planning
G. Huston, Quality Assurance Auditor
J. Lansing, Manager, Regulatory Compliance
J. Lynch, Emergency Planning Trainer
M. McFarland, Operations Staff Superintendent
K. Meads, Supervisor, Regulatory Compliance
J. Messina, Director
C. Miklacic, Simulator Support Staff
K. Russell, Compliance Engineer
L. Schlauch, Onsite Emergency Planner
T. Shega, Manager, Special Projects
F. von Ahn, Plant Manager

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Opened and Closed

None.

Discussed

None.

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety but rather that selected sections of portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

1EP1 Exercise Evaluation

Perry Plant Exercise Scenario Manual; dated October 5, 2004

EPI-A1; Emergency Action Levels; Revision 13

EPI-A2; Emergency Actions Based on Event Classification; Revision 9

EPI-A6; TSC Activation; Revision 13

EPI-A7; OSC Activation; Revision 13

EPI-A8; EOF Activation; Revision 10

EPI-B1; Emergency Notification System; Revision 13

EPI-B3; Radiological Surveys for Emergencies; Revision 9

EPI-B4; First Aid and Medical Care; Revision 10

EPI-B5; Personnel Accountability/Site Evacuation; Revision 8

EPI-B7a; Automated Offsite Dose Calculations; Revision 8

EPI-B8; Protective Actions and Guides; Revision 10

EPI-B11; Emergency Dosimetry Issue; Revision 6

Scenario Time Line and Sequence of Events for a May 2002 Drill

September 2002 Training Drill Self-Assessment Report; dated October 17, 2002

Scenario Manual for a February 2003 Training Drill

Scenario Time Line and Sequence of Events for a June 2003 Drill

Scenario Time Line and Sequence of Events for a November 2003 Drill

Scenario Time Line and Sequence of Events for a February 2004 Drill

Scenario Time Line and Sequence of Events for Two Practice Drills Conducted in September 2004

4OA1 Performance Indicator Verification

PYBP-RAS-0004; NRC Performance Indicators; Appendix A; Revision 2

Nuclear Engineering Instruction 0951; Prompt Alert System

Perry Plant Emergency Planning Zone ANS Test Reports; January 2003 through June 2004

Records of Key ERO Members' Drill, Exercise, and Actual Emergency Event Participation; January 2003 through June 2004

Monthly Records of DEP Opportunities; January 2003 through June 2004

LIST OF ACRONYMS USED

ANS	Alert and Notification System
CRS	Control Room Simulator
DEP	Drill and Exercise Performance
EI	Emergency Implementing (procedure)
EOF	Emergency Operations Facility
ERO	Emergency Response Organization
NRC	Nuclear Regulatory Commission
NUREG	Nuclear Regulatory Guide
OSC	Operations Support Center
PI	Performance Indicator
TSC	Technical Support Center