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Dalwyn R. Davidson
VICE PRESIDENT
SYSTEM ENGINEERING AND CONSTRUCTION

August 13, 1980

Mr. Gaston Fiorelli
Reactor Construction and
Engineering Support Branch
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

RE: Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Response to I. E. Report

Dear Mr. Fiorelli:

This letter is to acknowledge receipt of your Inspection Report Number 50-440/80-10, attached to your letter dated July 9, 1980. This report identifies areas examined by Mr. E. W. K. Lee during the inspection conducted June 25 through 27, 1980.

Attached to this letter is our response to the two (2) items of noncompliance described in Appendix A, Notice of Violation. 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.

Please call if there are any questions.

Very truly yours,

D. R. Davidson
Vice President
System Engineering and Construction

ksz
Attachment

cc: J. Hughes

Boos, 11

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RESPONSE TO ENFORCEMENT ITEMS

Listed below are our responses to Appendix A, Notice of Violation, of United States Nuclear Regulatory Commission I. E. Report 50-440/80-10.

I. A. Infraction

10CFR50, Appendix B, Criterion IX, states that "Measures shall be established to assure that special processes, including welding, heat treating, and nondestructive testing, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria and other special requirements.

Cleveland Electric Illuminating Company PSAR Section 17, paragraph 17.1.9.1 states, in part, that ... "Special processes to be used during the manufacture and installation of equipment shall be established and controlled in accordance with approved procedures..."

General Electric Company Installation and Service Engineering Division (I&SE) Procedure No. GWP-1000, Revision 15, Paragraph 5.11.1.1 states that, "Bead width shall be limited to the lesser of three times the diameter of the electrode core, or 5/8"."

Contrary to the above, on June 26, 1980, the inspector established that at least a pass of the weld bead width of the Recirculation System Weld No. B33-1-B6 on Traveler No. T1-B33-06 was between 3/4" to 1" and 1/8" diameter electrodes were used.

B. Response

1. On June 26, 1980, GE I&SE issued Nonconformance Report GE 38-24 which required that the referenced weld be reworked. The affected weld bead in the area described was to be ground down and then reworked as required by approved procedures. This work was completed, and the Nonconformance Report was closed out on July 1, 1980.
2. Corrective Action Request 0499 was issued to GE I&SE (SP-38/39) as a result of this NRC observation. In response, a special teaching and practical demonstration on welding techniques was administered to the GE Quality Control Inspectors, the Production Engineers, and the welders to reinforce personnel cognizance of stated requirements. This action was determined to be acceptable, and CAR 0499 was closed out on July 15, 1980.
3. Full compliance has been achieved.

II. A. Infraction

10CFR50, Appendix B, Criterion X, states, in part, that ... "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity..."

Cleveland Electric Illuminating Company PSAR Section 17, Paragraph 17.1.10.1 states, in part, that ... "A program for inspection has been established by CEI to assure that all safety class equipment and structures meet required quality standards..."

Pullman Power Products (PPP) Procedure No. IX-6, dated February 28, 1979, Paragraph 8.1.4 states, ... "Undercutting occurring at any position on the entire length of the weld shall not exceed 1/32 inch in depth or in any case reduce the required section thickness." Pullman Power Products drawing for Pipe Support No. 1P42-H123 requires that Welds No. AFW4 and AFW5 be full penetration welds.

Contrary to the above, on June 27, 1980, the inspector established that Weld Nos. AFW4 and AFW5 of the Emergency Closed Cooling System Pipe Support No. 1P42-H123 failed to meet the procedure and drawing requirements in that (1) the welds appear to have undercuts exceeding 1/32", and (2) the welds do not appear to penetrate the back side of plate. Furthermore, both welds were accepted by PPP on September 17, 1979.

B. Response

1. The welds identified during the inspection, Hanger 1P42-H123 FW-4 and 5, were examined by Pullman Power Products and CEI inspectors. Both welds were deficient because of undercut of approximately 1/32" and undersize weld at the weld extremities. Both welds were found to have full penetration. In addition, FW-2 on Hanger 1E1?-H217 was found to have undercut of approximately 1/32". Pullman Power Products initiated nonconformance report number PPP-354 documenting the above deficiencies.

In addition, the Project Organization is performing 100% final weld inspection of ten (10) Pullman installed hangers selected at random. The results of these inspections will be used to determine whether the above deficiencies are isolated cases or whether they represent generic problem areas.

Project Organization QC performs regular Surveillance/Inspection of Pullman Power Products field welding activities. The results of these Surveillance/Inspections indicate there are no generic problems with Pullman Power Products field welding.

Response (Cont'd)

2. Individual training sessions are being held with the QC Inspectors to assure their understanding of acceptable weld profiles and inspection techniques.
3. Full compliance will be achieved by August 29, 1980.