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Dalwyn R. Davidson
VICE PRESIDENT
SYSTEM ENGINEERING AND CONSTRUCTION

July 30, 1980

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

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 50-440/80-09, 50-441/80-09, attached to your letter dated June 26, 1980, which I received on June 30, 1980. This report identifies areas examined by Mr. J. E. Konklin during the inspection conducted June 10 through 12, 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 don't hesitate to call if there are any questions.

Very truly yours,

D. R. Davidson
Vice President
System Engineering and Construction

ksz
Attachment

cc: J. Hughes

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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 50-440/80-09; 50-441/80-09.

I. A. Infraction

10CFR50, Appendix B, Criterion V, states in part that, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these...Instructions, procedures, or drawings shall include appropriate...acceptance criteria..."

The CEI Corporate Nuclear Quality Assurance Program, Section 0500, Paragraph 1.1.1, states in part that, "Activities affecting quality shall be described by an approved instruction, procedure, or policy ...Appropriate quantitative and qualitative acceptance criteria shall be delineated to provide measures for determining the satisfactory accomplishment of important activities."

Contrary to the above, during the period June 10-12, 1980, the inspector found that CEI did not have adequate procedural requirements, including appropriate acceptance criteria, for accomplishment and verification of the reactor vessel recirculation nozzle modification work.

B. Response

1. Following the NRC inspection, several actions were taken. General Electric ultrasonically examined all twenty recirculation nozzles to obtain thickness measurements. The value and location of minimum wall thickness for each nozzle was noted on the examination data sheet. An Action Request was sent to General Electric San Jose requesting: (a) the minimum design calculated wall thickness for a nozzle of maximum nominal inside dimension; and (b) the minimum design calculated wall thickness for the nozzle which, by indication configuration, proved to be the worst case identified at Perry, Units 1 and 2.

The minimum wall information provided by General Electric Company was compared to the ultrasonic thickness data obtained for each nozzle. Construction Quality Engineering and Engineering agreed that all twenty nozzles met the acceptance criteria based on the data received.

2. The control of wall thickness was based on implementing approved procedures. Pre-machining and post-machining measurements were taken as part of approved procedures. A 0.060-inch grinding limit was imposed on GE I&SE by GE San Jose. Beyond this limit a Field Design Deviation Request had to be generated which controlled the depth of grinding and permanently recorded these dimensions. A Project Administration Procedure has been drafted which will define interface control of Field Disposition Instruction/ Field Deviation Disposition Requests between CEI and GE.

Response (Cont'd.)

3. Full compliance will be achieved by September 30, 1980.

II. A. Deficiency

10CFR50, Appendix B, Criterion XVII, states in part that, "Sufficient records shall be maintained to furnish evidence of activities affecting quality...The records shall include...the results of reviews..."

The CEI Corporate Nuclear Quality Assurance Program, Section 1700, Paragraph 1.2.3, states in part that, "Sufficient records and documentation shall be maintained to provide evidence of...the activity affecting quality...The following shall be considered as part of quality assurance records:...Results of reviews..."

Contrary to the above, on June 11, 1980, the inspector and CEI licensing personnel were unable to find evidence that reviews had been made of those IE Bulletins and Circulars which did not require a written response to NRC.

B. Response

1. All IE Bulletins, Circulars, Information Notices and Preliminary Notifications of Events or Unusual Occurrences sent to PNPP are being reviewed and evaluated by a responsible project section. As of July 2, 1980, these evaluations are being documented and maintained on file, both for IE Documents requiring written response to the NRC, and for those which do not. To provide comprehensive records, a documented review of all IE Documents received prior to July 2, 1980, is being conducted.
2. The program for review of IE Documents has been revised, and Project Administration Procedure 1601, effective July 2, 1980, entitled "Evaluation of IE Documents" has been issued. Additionally, Nuclear Design Instruction 35-0603 is being revised to clarify preparation of the required documentation.
3. Review of previously received IE Bulletins and Circulars will be completed by November 1, 1980, and full compliance with Project review commitment will be achieved by June 1, 1981.