

U.S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report Nos. 50-440/80-17; 50-441/80-16

Docket Nos. 50-440; 50-441

License Nos. CPPR-148; CPPR-149

Licensee: The Cleveland Electric Illuminating  
Company  
Post Office Box 5000  
Cleveland, OH 44101

Facility Name: Perry Nuclear Power Plant, Units 1 and 2

Inspection At: Perry Site, Perry, OH

Inspection Conducted: August 26-28, 1980

Inspector: J. E. Konklin *C.C. Williams* 9/17/80

Approved By: C. C. Williams, Chief *C.C. Williams* 9/17/80  
Project Section No. 2

Inspection Summary

Inspection on August 26-18, 1980 (Report No. 50-440/80-17 and 50-441/80-16).

Areas Inspected: Licensee actions relative to previously identified open items; status of ASME Code compliance activities; licensee actions relative to the review of IE Bulletins and Circulars. This inspection involved a total of 21 onsite inspector-hours by one NRC inspector.

Results: No items of noncompliance or deviations were identified.

## DETAILS

### Persons Contacted

#### Principal Licensee Employees

\*G. Groscup, Manager, Nuclear Engineering Department  
\*W. Kacer, General Supervising Engineer, CQS  
\*P. Martin, General Supervising Engineer, PQS  
\*G. Ankney, Sr. Licensing Engineer  
\*P. Gibson, CQC Supervisor  
\*R. Crofton, CQS Piping Quality Engineer  
\*R. Williams, CQS Mechanical Quality Engineer  
\*D. Fitzpatrick, Site Construction Manager  
M. Combs, CQS Engineering Aide

#### NRC Personnel

\*J. Hughes, Perry Resident Inspector, RIII

\*Denotes those present at the exit meeting on August 28, 1980.

The inspector also contacted other licensee and contractor employees, including craftsmen and members of the quality, technical, and engineering staffs.

#### Licensee Action on Previous Inspection Findings

(Closed) Noncompliance (440/79-04-01; 441/79-04-01). Improper storage of pipe sleeves. The previous RIII report noted that ten pipe sleeves intended for installation in the Unit 1 Bioshield Wall were not stored in accordance with ANSI N45.2.2 requirements. During this inspection, the inspector observed that the subject pipe sleeves are now installed, and that housekeeping and storage practices in the area have improved significantly. This item is closed.

(Closed) Noncompliance (440/79-10-01; 441/79-10-01). Lack of timely corrective action with regard to ASME Code certification system requirements. Paragraph 1 of this report discusses in detail the corrective actions which have been taken by the licensee, and concludes that the ASME Code certification system requirements are now being effectively implemented. This item is considered to be closed.

(Closed) Noncompliance (440/80-09-02; 441/80-09-02). Failure to document reviews of IE Bulletins and Circulars which do not require a written response to NRC. As discussed in Paragraph 2 of this report, the inspector reviewed the licensee's revised procedure to be implemented for control of IE Bulletins and Circulars, reviewed the records of reviews of selected bulletins and circulars, and concluded that appropriate corrective actions are being taken in this area. This item is closed.

## Functional or Program Areas Inspected

### 1. Status of ASME Code Compliance Activities

Previous RIII Report 50-440/79-10; 50-441/79-10 discussed the inspector's review of the licensee's implementation of ASME Code certification system requirements on the Perry Project, and noted specific concerns regarding the licensee's implementation of the requirements.

During this inspection, the inspector discussed with the licensee the status of the ASME Code compliance activities, and reviewed pertinent documentation related to those activities. Among the documents reviewed were the following:

- a. Letter dated December 10, 1979, to CEI from the State of Ohio, which confirms that all ASME Code Section III piping, with the exception of the instrumentation piping being installed under Specification SP-90, may be fabricated and installed to the 1974 edition, Winter 1975 addenda, and that components purchased at later dates, but which are considered extensions of pre-1975 contracts, may be installed to the same edition and addenda of the Code.
- b. Engineering Change Notice, ECN No. 3211-38-76, which changes Specification SP-38 to specify the ASME Code 1974 edition with addenda through Winter 1975.
- c. Letter dated February 8, 1980 from the State of Ohio to the ASME Subcommittee on Nuclear Certification, which discusses the satisfactory results of an "Owners Interview" with CEI on February 8, 1980 and which recommends that the appropriate Certificate of Authorization be granted to CEI.
- d. The ASME Certificates of Authorization, No. OWN-171 for Perry Unit 1 and No. OWN-172 for Perry Unit 2, both certificates authorized on February 12, 1980 and expiring on February 12, 1983.
- e. Engineering Change Notice, ECN No. 3594-90-40, which changes Specification SP-90 to specify the ASME Code 1974 edition with addenda to Winter 1975.

During discussions with the licensee regarding the ASME Code compliance activities, the inspector obtained clarification of the following points:

- a. All Safety Class I, II, and III piping is under Specifications SP-44 and SP-47, both of which specify the 1974 edition, Winter 1975 addenda, of the ASME Code.

- b. All of the NSSS Code welds, with the exception of the recirculation and main steam systems which were done to earlier codes, are considered piping welds under SP-44.
- c. The Johnson Controls work under Specification SP-90 was originally specified to the 1974 edition, Winter 1975 addenda, in the bid specification; was then mistakenly changed to the 1977 edition, Winter 1977 addenda, in the conformed specification; and has since been changed back by the ECN noted above.
- d. The suppression quenchers were bought from GE to the 1977 edition, Winter 1977 addenda, but were bought as an amendment to the original NSSS contract, which will be used as the basis for changing the requirements to specify the 1974 edition, Winter 1975 addenda.
- e. The NSSS equipment which was originally supplied by GE to an earlier Code edition has been upgraded to the 1974 edition, Winter 1975 addenda, to be consistent with the remaining Perry Plant ASME Code equipment.
- f. All fabrication and inspection of the containments have been done in accordance with ASME Code requirements, but the containments will not receive a Code stamp. Division II of the Code was not yet in effect at the time the containment design was done. However, a certified design specification was not available prior to the effective date for Division II; therefore, CEI has been required to submit a design package to ASME and to request a "State Special" designation for the containment. The State of Ohio is presently reviewing the design package.

Based on the review of applicable documentation and the discussions with the licensee, the inspector concluded that effective corrective actions are being taken by the licensee to assure Perry Project compliance with the ASME Code certification system requirements. The previous noncompliance cited in RIII Report 50-440/79-10, 50-441/79-10 regarding lack of timely corrective action in this area is considered to be closed.

## 2. Licensee Actions Relative to IE Bulletins and Circulars

During a previous inspection, 50-440/80-09, 50-441/80-09, the inspector cited the licensee for failure to document reviews of specific IE Bulletins and IE Circulars. During this inspection the inspector reviewed the licensee's handling of IE Bulletins and Circulars to determine whether the system which has been set up for evaluating and responding to the IE documents is being effectively implemented. Included in the evaluation were discussions with CQS and licensing personnel, and review of the documentation for selected bulletins and circulars to determine whether distribution

was made to the appropriate persons, whether appropriate evaluations were performed and, where applicable, whether timely and appropriate responses were made to NRC.

The results of the evaluation indicated that an effective system is now being implemented by the licensee with regard to control of IE Bulletins and Circulars. The previous noncompliance (50-440/80-09-01; 50-441/80-09-01) is considered to be closed.

Licensee actions with regard to the following IE Bulletins and Circulars were evaluated and found to be adequate. These IE Bulletins and Circulars are considered to be closed:

- a. IE Bulletin 79-13
- b. IE Bulletin 79-13, Revision 2
- c. IE Bulletin 79-15
- d. IE Bulletin 80-02
- e. IE Bulletin 80-09
- f. IE Bulletin 80-11
- g. IE Bulletin 80-12
- h. IE Circular 79-10
- i. IE Circular 79-11
- j. IE Circular 79-13
- k. IE Circular 79-19
- l. IE Circular 79-23
- m. IE Circular 80-07
- n. IE Circular 80-10
- o. IE Circular 80-11

No items of noncompliance were identified.

#### Exit Interview

The inspector and the RIII Resident Inspector met with licensee representatives (denoted under Persons Contacted) at the conclusion of the inspection on August 28, 1980. The inspector summarized the purpose and findings of the inspection. The licensee acknowledged the findings reported herein.