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

REGION III

Report Nox. 50-440/80-25: 50-441/80-23

Docket Nos. 50-440; 50-441 License Nos. CPPR-148; CPPR-149

Licensee: Cleveland Electric Illuminating Company P. O. Box 5000 Cleveland, OH 44101

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

Inspection at: Perry Site, Perry, OH

Inspection Conducted: Doctober 1-31, 1980 Inspector: Hughes

Approved By: C.C. Williams, Chief Projects Section 2

11/17/80

Inspection Summary

Inspection on October 1-31, 1980 (Report No. 50-440/80-25; 50-441/80-23) Areas Inspected: Routine inspection by the IE Regional Resident Inspector (RI) of safety related construction activities, including welding of reactor recirculation system piping; containment spray system piping; installation of electrical conduit; and electrical quality records. This inspection involved 108 inspection hours by one NRC inspector.

Results: In the four areas inspected, one item of noncompliance was identified (infraction: Unit 1 - failure to follow procedure and specifications)

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DETAILS

Persons Contacted

- *M. Edelman, Manager, Nuclear QA Department
- *G. Groscup, Manager, Nuclear Engineering Department
- W. Kacer, General Supervising Engineer, CQS
- *J. Kline, General Supervising Engineer, Construction
- B. Barkley, General Supervising Engineer, Design
- P. Martin, General Supervising Engineer, PQS
- G. Leidich, CQS QE Supervisor
- K. Combs, CQS Engineering Aide
- S. Tulk, CQS Lead Electrical Quality Engineer
- T. Thompson, CQS Electrical Quality Engineer
- E. Christiansen, Nuclear Electrical Engineer

Other Personnel

- R. Matthys, CQS Quality Engineer (GAI)
- R. Williams, CQS Lead Mechanical Quality Engineer, (GAI)
- R. Crofton, CQS Lead Piping Quality Engineer (GAI)
- G. Parker, CQS Quality Engineer (GAI)
- K. Pech, Assistant Project Manager (GAI)

Ine inspector also contacted and interviewed other licensee and contractor personnel during this reporting period.

*Denotes those attending at least one of the exit meetings.

Licensee Action on Previous Inspection Findings

(Closed) Unresolved Item (440/79-01-01; 441/79-01-01): CEI Quality Engineering QA audit to verify the validity of General Electric (GE) Product Quality Checklist (PQC). The inspector reviewed CEI's audit report No. 300.545.1100, dated December 4, 5, and 6, 1979. The scope of the audit included: seismic and environmental qualification documentation for the Emergency Core Cooling Systems Motors Standby Liquid Control System Motors, and Main Steam Isolation Valves Leakage Control Blower Motors. With regard to test plans and qualification documentation for the H13 panels, electrical components, control room, and GE procured electrical equipment, the development of the test plans is behind schedule and none were available for review by the audit team. The Resident Inspector (RI) will continue to monitor this area.

(Closed) Unresolved Item (440/80-02-01; 441/80-02-01): Housekeeping/ industrial safety concerns. The RI observed the cleanliness and safety throughout the plant and determined that it was satisfactory. Interviews with the safety officer and contractor craftsmen indicated that there was an indoctrination training program for all new personnel. The inspector observed the availability of contractor QC inspectors in the welding areas and determined that this area is satisfactory. (Closed) Unresolved Item (440/80-16-02; 441/80-15-02): Failure to document in-process inspection of deburring (reaming) activities during the installation of field cut conduit prior to May, 1980. The inspector reviewed L. K. Comstock (LKC) Inspection Report No. 123 dated September 19; 1980. LKC inspected conduit installed prior to May 15, 1980, per LKC QA/QC Procedure 4.3.1, titled, "Cable Tray and Conduit Installation", and per conduit installation drawings D-215-111-F and D-215-084-G. The RI has no further questions on this matter at this time.

Functional or Program Areas Inspected

1. Plant Tours, Units 1 and 2

One or more plant areas were toured several times each week during this reporting period to observe general construction practices, area cleanliness, and storage/maintenance conditions of equipment, piping, conduit, and cable trays.

No items of noncompliance or deviations were identified.

- Reactor Coolant Pressure Boundary Piping Observation of Welding Activities Unit 1
 - a. The inspector observed welding of the Reactor Recirculation System Weld No. B33-1-B11 on traveller No. TI-B33-011. It was determined that (1) work was conducted in accordance with traveller; (2) proper welding materials were used; (3) welding procedure requirements were met; (4) work area was free of weld rod stubs; and (5) physical appearance was acceptable.
 - b. The following welds were complete or partially completed; B-33-1-A6 is complete, B33-1-A7 completed and needs a final visual examination, B33-1-B7 completed and needs a final visual examination, B33-1-A10 is complete and needs an RT and visual examination, B33-1-A4 and B33-1-B4 are partially complete. The RI will continue to monitor the welding activities and review the final documentation of the above mentioned welds.
 - c. The inspector toured the I&SE welding material issuing station located at the Intermediate Building. It was determined that (1) the welding materials are properly identified and segregated; (2) the temperature of rod ovens is maintained; (3) calibrations of temperature gauges are current; (4) records are properly kept; and (5) issuance and return of welding materials are controlled in accordance with approved procedures.

No items of noncompliance or deviations were identified.

3. Installation of Safety-Related Penetrations

The RI observed work activities including handling, protection, inspection, and welding of safety-related penetrations.

- a. The inspector observed the in-process welding of penetration P-103, LPCS pump suction, in accordance with Drawing B312-631, Revision D.
- b. The inspector reviewed the field weld process sheet.
- c. During this reporting period, the inspector reviewed NDE qualification records for two liquid penetrant inspectors (Pullman), to verify that their qualifications were current.

No items of noncompliance or deviations were identified.

4. Observation of Safety-Related Piping Welding Activities Unit 1

The inspector observed, on October 23, 1980, that fabricated spool pieces Nos. 1-E15-32 and 1-E15-33 were being cold pulled into position with a 2 1/2 ton "come-a-long". The inspector could not determine if pulling the pipe a few inches would cause permanent cracking or permanent deformation in the pipe. Upon questioning the contractor, nonconformance report (NCR) No. CQC-1922 was generated. The NCR stated that this operation is not to be used, unless temporary cold springing is done without exceeding elastic limits of the pipe. The NCR also gave acceptance criteria for temporary cold springing. This condition represents an item of noncompliance as identified in Appendix A. (50-440/80-25-01)

Note: The above mentioned condition was previously brought to the licensee's attention in IE Inspection Report No. 50-440/80-19; 50-441/80-17.

5. Review of Procurement Records, Units 1 and 2

a. The RI reviewed qualification documentation packages for Westinghouse supplied Emergency Service Water Pump House Ventilation Fan Motors 1M32-C001A, C001B; 2M32-C001A, C001B, and Diesel Generator Building Ventilation Fan Motors 1M43-C001A, C001B, C001C, C002A, C002B, C002C; 2M43-C001A, C001B, C001C, C002A, C002B, C002C. The qualification documentation package verified that the specified tests were successfully completed in accordance with the specifications and purchase order.

The review included:

- (1) CEI Purchase Order No. P-1189-S.
- (2) Material Receiving Reports, MR No. 11514, 12156, and 12368.

- (3) Gilbert Associates Equipment Specifications SP-648-4549-00, Revision 1 and SP-551-4549-00, Revision 0.
- (4) Westinghouse Certificate of Compliance dated April 13, 1977, which stated that all loads, stresses, and deflections were within allowable limits and that the seismic qualification included in the documentation package was by the analysis method.
- (5) The aging test was performed by accelerated aging simulation in accordance with IEEE standard 334-1974 at 210°C. The test results appear to be satisfactory.
- (6) The equipment qualification data was included in the qualification documentation package as Westinghouse document WCAP-9112 and was stated to be in accordance with IEEE standard 323-1974. This document included the following parameters:
 - (a) Temperature: -20°F to 122°F
 - (b) Humidity: below 90%

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- (c) Pressure: atmospheric
- (d) Irradiation: 2×10^7 R
- (e) Aging: 40 years
- b. The inspector reviewed documentation for Brand-Rex electrical cable to confirm that specified tests were successfully completed in accordance with specifications and purchase order. The review included:
 - (1) Material Receiving Reports (i.kR's) 12587, 12095, and 12543.
 - (2) Purchase Order 16802.
 - (3) Gilbert Associates cable specification, SP-561-4549-00.
 - (4) Brand-Rex vertical tray flame test, dated March 9, 1976.
 - (5) Franklin Institute Research Laboratories test report number F-C4113 titled, "Qualification Tests of Electric Cables for Class 1E Service in Nuclear Power Plants" dated May 1975.
 - (a) LOCA Testing
 - (b) Thermal Aging Test
 - (c) Radiation Exposure Test

- (d) Steam/Chemical Spray Exposure Test
- (6) Gilbert Associates Incorporated (GAI) letter, PY-GAI-Ven-0003, dated October 10, 1980, to Cleveland Electric Illuminating Company which stated that the guidelines set by IEEE-323 and 383 and the requirements of Specification SP-561-4549-00 are approved for Perry Nuclear Power Plant application.

No items of noncompliance or deviations were identified.

7. Other Areas Inspected

During this reporting period, the inspector reviewed personnel qualification records of the four electrical quality control inspectors (Level II) assigned to the Construction Quality Control Section. The requirements were checked against ANS 15.2.6. Site conducted written proficiency testing for all four individuals before certification, and supporting requirements such as eye/physical exams and indoctrination training, were documented. The period of qualification was documented on the Certification of Qualification for each individual in accordance with Regulatory Guide 1.58 and ANSI N 45.2.6.

All personnel records are current and the inspector has no further questions at this time.

Exit Interview

The inspector met with site staff representatives (denoted under Persons Contacted) on October 3, 17, and 24, 1980. The inspector summarized the scope and findings of the inspections performed. The licensee acknowledged the findings.

Attachment: Preliminary Inspection Findings

OFFICE OF INSPECTION AND ENFORCEMENT

PRELIMINARY INSPECTION FINDINGS

LICENSEE CLEVELAND ELECTRIC ILLUMINATING CO	2. REGIONA IE REG	L OFFICE ION III
3. DOCKET NUMBERS 4. 50-440;50-441 CPPR	LICENSE NUMBERS 148;CPPR 149	5. DATE OF INSPECTION 10/13/80
6. Within the scope of the insp were found.	ection, no items of r	noncompliance or deviation
7. The following matters are pr	reliminary inspection	findings:
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8. These preliminary inspection	n findings will be re I Office and they wil	viewed by NRC Supervision/

concerning any enforcement action. Nuclear Regulatory Commission Inspector ughe

# PRELIMINARY INSPECTION FINDINGS

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. LICENSEE CLEVELAND ELECTRIC ILLUMINATI	NG CO.	2. REGIONAL IE REGIO	OFFICE N III
. DOCKET NUMBERS 0-440;50-441	4. LICENSE CPPR 148;CPP	NUMBERS R 149	5. DATE OF INSPECTION
6. Within the scope of the were found.	inspection,	no items of no	oncompliance or deviation
7. The following matters a	re preliminar	ry inspection :	findings:
8. These preliminary insp Management at the Regi concerning any enforce	pection findi ion III Offic ement action.	ngs will be re e and they wil	viewed by NRC Supervision/ 1 correspond with you
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## PRELIMINARY INSPECTION FINDINGS

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1. LICENSEE		2. REGIONAL OFFICE	
CLEVELAND ELECTRIC ILLUMINATING CO.		IE REGION III	
3. DOCKET NUMBERS 50-440;50-441	4. LICENSE CPPR 148;C	NUMBERS PPPR 149	5. DATE OF INSPECTION 10/2024/80
6. Within the scope of the were found.	inspection,	no items of non	compliance or deviation
7. The following matters ar	e prelimina	ry inspection fi	ndings:
SEE ATTACHMENT			
			rieved by NRC Supervision
XXX 8. These preliminary insp Management at the Reginst concerning any enforce	pection find ion III Offi ement action	ce and they will	correspond with you

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Appendix A

NOTICE OF VIOLATION She Cleveland, Sectric Illuminating Company

Docket 1/2. 50-440 Docket 1/2. 50-441

Based on the results of an NRC inspection conducted in October 1-31, 1980, it appears that certain of your activities were not conducted in full compliance with NRC requirements. This item is a infraction.

10 CFR 50, appendix B, Criterion IX (Control of Special Grocesses) and PNPP PSAR Chapter 17, Section 17. 1.9.6, requires that the contractor .. establish contro e over special processes for all safety class equipment and structures. as a minimum, the procedures will edentify equipment, preparation, parametics, processing details, and etc. POOR ORIGINAL

CEI Specification for Installation of Safety Class Riping - Group 1, specificat tion number SP-44-45749-00 revision 1 Section 2:04.10 states that siging shall be in proper alignment before connections are made. No piping shall be "colol sprung of prestured unless it is so indicated on the Engineer's Pravings Contrary to the above, on October 23 1980, the inspector observed fabricated pool pieces nos: 1-E15-32 and 1-E15-33 were being cold pulled into position.

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