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Dalwyn R. Davidson  
VICE PRESIDENT  
SYSTEM ENGINEERING AND CONSTRUCTION

March 27, 1981

Mr. C. E. Norelius, Acting Director  
Division of Engineering and Technical Inspection  
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. Norelius:

This letter is to acknowledge receipt of Inspection Report Number 50-440/81-03, 50-441/81-03, attached to your letter dated March 3, 1981, which I received on March 5, 1981. This report identifies areas examined by Messrs. J. F. Schapker and R. B. Landsman for inspections conducted January 21 to 23, and January 28 to 30, 1981.

Attached to this letter is our response to the one (1) Severity Level V Violation 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. ----

In response to your request that we describe the actions taken or planned to assure that all contractor inspection personnel (current and future) at the Perry site are properly certified, I trust that sufficient information has been included in the attached response to permit evaluation. The information submitted is true and correct to the best of my knowledge, information and belief. If there are additional questions, please do not hesitate to call.

Very truly yours,

D. R. Davidson  
Vice President  
Systems Engineering and Construction

ksz  
Attachment

cc: J. Hughes, NRC - Site

Mr. G. Fiorelli  
Division of Resident and Project Inspection  
U. S. Nuclear Regulatory Commission, Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

U. S. Nuclear Regulatory Commission  
c/o Document Management Branch  
Washington, D. C. 20555

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## RESPONSE TO ENFORCEMENT ITEMS

Below is our response to Appendix A, Notice of Violation, of United States Nuclear Regulatory Commission I.E. Report 50-440/81-03; 50-441/81-03.

### I. Noncompliance 440/81-03-02; 441/81-03-01

#### A. Severity Level V Violation

10 CFR 50, Appendix B, Criterion V (Procedures), states in part that, "Activities affecting quality shall be prescribed by documented instructions . . . and shall be accomplished in accordance with these procedures . . ."

CEI Corporate QA Program, Section 0200 requires that examination and test personnel . . . shall qualify to and be certified to the requirements of Regulatory Guide 1.58 and ANSI N45.2.6.

Contrary to the above, National Mobile, Great Lakes and Dick Corporation failed to follow the above procedure by certifying seven inspection personnel who lacked the required prior experience at the time of certification. Proficiency testing appeared to be the main basis for certifying the seven individuals. Furthermore, one inspection individual still does not meet the experience requirements of ANSI N45.2.6.

#### B. Response

1. and 2. As agreed in the Exit Meeting, CEI is in the process of reviewing the remaining contractor QC inspection personnel qualifications to re-confirm that the following criteria are being implemented:

- a. Proficiency testing shall not be used as the sole basis for certification.
- b. In cases where the education and experience requirements are not created as absolute, as described in Section 3.1 of ANSI N45.2.6-1973, proficiency testing may be used to verify competency to perform particular tasks. When this occurs, the certification documentation shall state the limitation of the certification (e.g., "Level I Receipt Inspection" in lieu of "Level I Mechanical").

Specific action has been taken with respect to National Mobile Concrete Corporation. They have been required to revise the training section of their Quality Assurance Manual to address the minimum education, experience and training requirements which must be met prior to issuance of a limited certification.

A training session was held within the Construction Quality Engineering Unit to re-emphasize the importance of consistent implementation of the above criteria, and to avoid future re-occurrences of similar violations.

3. Full compliance will be achieved by May 31, 1981.