UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, ET AL.	)	Docket Nos. 50-440 50-441
	)	
(Perry Nuclear Power Plant, Units 1 and 2)	)	

AFFIDAVIT OF GARY R. LEIDICH

County of Lake)
: ss:
State of Ohio)

Gary R. Leidich, being duly sworn, deposes and says as follows:

1. I, Gary R. Leidich, am Senior Engineer, Nuclear Construction and Engineering Section, The Cleveland Electric Illuminating Company. My business address is 10 Center Road, Perry, Ohio 44081. My professional qualifications and experience is set forth in Applicants' Testimony following Tr. 1031 in the above-captioned proceeding. I have personal knowledge of the matters set forth herein and believe them to be true and correct.

2. I have reviewed the Motion to Reopen the Record on Issue #3, dated July 13, 1983 (the Motion), filed by Ohio Citizens for Responsible Energy (OCRE) in this proceeding. I have personal knowledge of the matters discussed in Attachments 2 and 3 to the Motion.

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The Cable Tray Issue

3. Engineering Change Notice 8701-33-1932 (Attachment 2 to the Motion), was issued in June 1982, following the NRC's 81-19 inspections. The NRC observed non-safety related cables above the side rails in the Control Complex, as described in §6.8.2 of Report No. 81-19. (Board Exhibit No. 3, p. 75). CEI adopted the ECN to clarify the cable fill specifications for safety-related cable installation, as explained herein.

4. The percentages (50% and 60%) previously in the specification are design objectives used by the design engineer to prescribe cable routing. Because of the spaces that occur among installed cables, it is normal for the installed cables to be well above 50% and 60% of the tray height. Because the percentages were intended only to be used as design objectives, and not for actual installation (i.e., the 50% and 60% objectives did not apply to the actual installed cable height relative to the tray height), the percentages were removed from the installation specification, and inspection criteria (½" below the top of the side rail) were added. The ECN added the inspection criteria, and inspection procedure, to ensure that the design engineer is notified when cables approach the top of the cable trays. Cables are only permitted above the trays with the proper engineering justification. (Any cable permitted above the tray height is retained by a cable tray side rail extension.).

5. Revision "A" to ECN 8701-33-1932 was adopted in February 1983. The revision deleted the following sentence: "The cable fill may exceed the top of the tray side rail due to field installation conditions." This deletion clarified the original intent of the ECN, which was to assure that proper engineering review is given to preclude any unsafe overfill conditions.

6. By Inspection Report No. 50-440/83-05; 50-441/83-05, transmitted to CEI on March 8, 1983, the NRC closed the unresolved item in question based on the Staff's review of ECN 8701-33-1932.

7. The National Electric Code is not applicable to Perry. Other electrical codes and standards do apply. These address separation criteria and related technical and safety factors, and are appropriately considered in the engineering reviews discussed above. For example, the cable design at Perry is based on International Cable Engineers Association (ICEA) standards. The ICEA standards correlate plant design requirements with cable capabilities, and consider parameters such as heat dissipation and ampacity. The Perry cable design meets ICEA standards, and where heat loading is involved (e.g., motor feeders), the Perry design exceeds the standards.

The Inspector Certification Issue

8. The items identified in the August 6, 1982 Comstock letter attached to the Motion (Attachment 3) relate to findings

made by Comstock during a comprehensive review of Comstock's inspection documentation following the NRC's 81-19 inspections. The particular finding cited by OCRE at page 2 of its Motion involved inspectors who signed inspection documents at a time when they were not certified to do so. The findings were based on a documentation review and did not include any analysis of the individuals' actual qualifications to perform their inspection functions.

9. In response to the finding, detailed checklists were developed by Comstock for each affected inspection area, and reinspections by properly certified inspectors were initiated. (The reinspections have to date identified no significant safety problems.). The checklists, and other Task Force corrective actions, were not recorded in formal QA documents. This was noted as a severity level IV violation by the NRC in Inspection Report No. 50-440/83-06; 50-441/83-06, transmitted to CEI on March 16, 1983.

10. In response to the Staff's concern, Comstock issued Nonconformance #'s 1795 and 1797 on February 21, 1983, and February 22, 1983, to document all Comstock inspector certification deficiencies and the related reinspection program. The nonconformances will remain open until all reinspection is completed. CEI issued Corrective Action Request (CAR) #83-02, dated February 28, 1983, to document the certification deficiencies and to provide for corrective action. The CAR was closed on June 21, 1983. CEI issued Deviation Analysis

Report (DAR) #118, dated February 28, 1983, to assure that all certification discrepancies were properly evaluated for reportability under 10 CFR § 50.55(e). Reviews conducted indicated that the certification discrepancies did not raise serious safety issues of a reportable nature under 10 C.F.R. §50.55(e), and the DAR was closed on March 2, 1983.

Gary R. Leidich
Gary R. Leidich

Subscribed and sworn to before me
this 4th day of August, 1983

Joanne [illegible]
NOTARY PUBLIC

My Commission Expires:
11-12-83