



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 ■ CLEVELAND, OHIO 44101 ■ TELEPHONE (216) 622-9800 ■ ILLUMINATING BLDG ■ 55 PUBLIC SQUARE

Serving The Best Location in the Nation

Dalwyn R. Davidson
VICE PRESIDENT
SYSTEM ENGINEERING AND CONSTRUCTION

August 26, 1982

Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
ACRS Committee Report on the
Perry Nuclear Power Plant, Unit 1

Dear Mr. Schwencer:

In your letter dated July 30, 1982, you requested our plans and schedules with respect to three comments in the ACRS letter dated July 13, 1982. These three comments are addressed below.

Your first question concerned our "addition of personnel with BWR operating reactor experience, and in particular, our schedule for filling the position of Superintendent of Plant Operations." Regarding this question, the schedule for hiring and/or assignment to the position of Superintendent of Plant Operations of a person with appropriate BWR operating reactor experience is one year prior to fuel load which currently is November, 1983. Recruitment and hiring of additional personnel with commercial BWR operating reactor experience will continue, with our goal being to provide at least one person experienced in BWR startup for each shift prior to fuel load. If our efforts fall short of staffing at this level, General Electric Company will provide such experienced personnel to supplement the startup engineering support group contracted to assist in the Perry Unit 1 startup.

Regarding our "studies to evaluate safe shutdown margins and contributions to overall risk for seismic events of somewhat greater severity than the Safe Shutdown Earthquake (SSE)", we provide the following information: The Perry Nuclear Power Plant structures and components are designed for a Safe Shutdown Earthquake acceleration of 0.15 g at the foundation level. Site specific response spectra were developed from strong-motion data base for the Perry site region. Following the tectonic province approach in accordance with Appendix A to 10 CFR 100, the NRC staff concluded that the controlling earthquake for the site did not change from that used at the Construction Permit stage, and that a 0.15 g acceleration used to anchor a standard design spectrum specified in Regulatory Guide 1.60 is adequately conservative for the SSE (Ref. PNPP SER 2.5.2.1).

Boo!

8209010281 820826
PDR ADOCK 05000440
A PDR

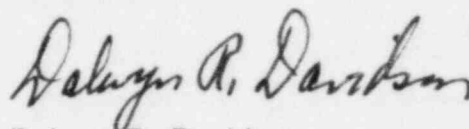
CEI is following closely the efforts of the ACRS Subcommittee on extreme External Phenomena to develop an appropriate method of evaluating seismic design margins. Our representative attended the Subcommittee meeting on August 11, 1982. We share the concerns raised by the staff regarding a lack of regulatory guidance as to methodologies and acceptance criteria for evaluating seismic design margins for an earthquake with lower probability but somewhat greater severity than the SSE presently defined. Because of the complexity of this issue, we have not yet formulated a plan to address this concern. We will continue to follow the ongoing discussions between the staff and ACRS, and monitor industry analytical and experimental efforts to deal with this issue. We will develop appropriate plans as the guidance develops.

Regarding "any additional measures planned by you to independently assess the adequacy of the quality of design and construction such as an INPO evaluation of the facility", CEI has also begun implementation of a self-initiated evaluation of construction activities as developed by INPO. The overall objective of this evaluation will be to assess the overall effectiveness of the construction effort on the Perry Project. Specific goals for the evaluation will be to identify and make recommendations to improve on any weaknesses identified in the management, QA, design control and construction activities. The evaluation team will be charged with observing, inspecting and interviewing those project persons involved in construction to confirm that programs to achieve results are being used and are effective.

To accomplish the above tasks a team of experts in various disciplines will be established. The team members will be selected based on the INPO Position Descriptions for a Self Initiated Evaluation Team. The completion of this evaluation is scheduled for January, 1983.

We hope the above responses will be sufficient for the staff to address these items for Perry.

Very truly yours,



Dalwyn R. Davidson
Vice President
System Engineering and Construction

DRD:mb

cc: Jay Silberg, Esq.
John Stefano
Max Gildner