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Dalwyn R. Davidson
VICE PRESIDENT
SYSTEM ENGINEERING AND CONSTRUCTION

September 2, 1982

Mr. James G. Keppler
Regional Administrator, Region III
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

RE: Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Undersized Guide Holes in One
and Two Directional Tubing
Clamps [RDC 60(82)]

Dear Mr. Keppler:

This letter serves as our final report pursuant to 10CFR50.55(e) concerning undersized tubing clamps that were supplied to Johnson Controls at the Perry Nuclear Power Plant by their sub-vendor, Stauff Corporation of Newark, New Jersey. Mr. J. Konklin of your office was first notified on August 6, 1982, by Mr. E. Riley that The Cleveland Electric Illuminating Company was investigating the potential deficiency.

Our report includes a description of the deficiency, analysis of safety implication, information concerning completed and planned corrective actions, and the planned date of completion.

Description of Deficiency

A number of one directional and two directional tubing clamps manufactured by Stauff Corporation were found to have undersized guide holes. This was identified by our Instrumentation Installation Contractor, Johnson Controls, Incorporated (JCI), and documented on Nonconformance Reports numbered JCI 092, 093, 094, and 095. Affected clamps included one directional clamp for 3/8" O.D. Tube, and two directional clamps for both 3/8" and 1/4" O.D. Tube.

Analysis of Safety Implication

Based upon review of the instrument tubing/support design on a generic basis, it can be postulated that, when tubing is anchored in the deficient clamps, the potential exists for overstressing the tubing in critical locations under thermal conditions. If the clamps were to "lock up", thermal growth of the tubing would be prevented.

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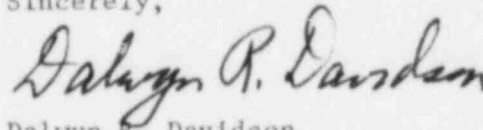
Corrective Action

After preliminary concerns were identified, JCI immediately put all Stauff tubing clamps on hold and did a 100% inspection of all unissued clamps. Of the clamps in stock, 6.9% were found to be rejectable and returned to the vendor. Field inspection of installed clamps revealed that 37 defective clamps were installed. The 37 defective clamps are identified on Nonconformance Report Number JCI 081. As a result of this problem and a vendor audit, Stauff Corporation was removed from the JCI Approved Vendors List. Subsequently, JCI notified Construction Quality Engineering that Stauff Corporation had provided 10CFR21 notification to the U.S. Nuclear Regulatory Commission, Region I, concerning these clamps.

Resolution of audit findings by Stauff Corporation is underway and upon close out, JCI will re-evaluate their sub-vendor for re-inclusion on their Approved Vendors List. After these actions are taken, replacement clamps will be shipped and field correction will be implemented. All required work should be completed by January 14, 1983.

If there are any questions, please do not hesitate to call.

Sincerely,



Dalwyn R. Davidson
Vice President
System Engineering and Construction

DRD:pab

cc: Mr. M. L. Gildner
NRC Site Office

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