



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

January 21, 1983

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: SALP REPORT

Dear Mr. Keppler:

At a meeting in The Cleveland Electric Illuminating Company offices on January 14, 1983, discussions were held with your staff on the findings and observations from the most recent SALP Evaluation for Perry Plant Units 1 and 2. I would like to thank you and your staff for your overall evaluation of our activity for the period of the report (October 1, 1981 through September 30, 1982). Also, the frank review and discussion with your staff at the meeting was most helpful to us.

In accordance with the SALP process, The Cleveland Electric Illuminating Company submits the following comments:

We are in general agreement with the "Summary of Significant SALP Report Findings" contained in Enclosure 1. We are encouraged by the favorable comments in this Section and in the body of the SALP Report itself. These comments indicate to us that the SALP Board and NRC management recognize the strong commitment and aggressive efforts The Cleveland Electric Illuminating Company is maintaining toward building a safe plant.

With respect to the ratings contained in Section III of the SALP Report:

- A. The Category I rating in two functional areas is appreciated. This recognition of good performance serves as added incentive to the Project Organization to maintain this level of performance.
- B. We accept the ratings in all other functional areas. However, as was discussed at the meeting, we wish to offer additional information for Functional Areas 5, 6 and 10 to clarify specific issues raised in the SALP Report. Comments on the three areas mentioned are contained in the next three items.
- C. With regard to Functional Area 5, Support Systems, the apparent item of non-compliance with the Ohio Basic Building Code (July 1, 1979 Edition) and Ohio Fire Code, resulted because of change in the building standards enforce-

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ment provisions relating to fire prevention. We wish the record to show that all areas in question which received a building permit after July 1, 1979 (Service Building/Technical Support Center, Guard House and Emergency Operations Facility) have been subsequently reviewed, modification agreed upon, and approved by the Perry Township Fire Chief. It should be noted that these facilities are all non-safety related. All areas of concern by the Perry Township Fire Chief have been resolved to his satisfaction.

- D. With regard to Functional Area 6, Electrical Power Supply and Distribution, we understand the Board's decision to issue a "no-rating" based on limited inspection activity during the period of this SALP Report.

In regard to the intensive electrical inspection which occurred during late 1981 and early 1982, we were pleased that the NRC reached the conclusion that there had not been a programmatic breakdown in the electrical area. Our earlier review had reached a similar conclusion. Nonetheless, the management of both the contractor and licensee undertook significant steps to enhance both the contractor's program and his performance.

Among the steps taken were:

1. Program Evaluation

- a. Immediately following the NRC inspections referenced above, a complete 18-point criteria audit of the contractor's site program was performed by the contractor's corporate QA organization. The findings from this audit have now been closed and suggested management improvements, which also came from this audit, have been implemented.
- b. The Cleveland Electric Illuminating Company performed 14 additional audits of the electrical contractor's program during 1982. Findings from these audits have also been closed out.
- c. The licensee and the contractor performed a complete reevaluation and update of the electrical contractor's procedures. Also, surveillance of hardware installation to verify conformance to procedures has been maintained at an increased level by the licensee.

2. Organization and Manning Changes

- a. The contractor completely reorganized his QA organization, both on site and at the home office, to improve address to quality issues.
- b. A welding engineer was added to the contractor's home office QA organization with heavy input to the Perry effort.
- c. The electrical contractor's site QA organization was increased from 29 to 50 persons which included addition of a quality engineer, a quality control supervisor, four lead inspectors, two Level II inspectors and 13 document reviewers.

- d. The contractor initiated a cross-training program for inspectors to increase their effectiveness. The training resulted in an increase of eighteen Level I certifications and thirty-five Level II certifications in the contractor's electrical and mechanical disciplines. This increase represents a doubling of the contractor's certifications.
- e. Surveillance of electrical activities by the Project Organization was substantially increased by addition of QA/QC personnel to the Licensee's staff in Construction Quality Section.
- f. An additional full-time Project Organization Quality Engineer was assigned to the electrical contractor to oversee their activities and their closing of non-compliances from the NRC inspection.

3. Status of Quality Findings

- a. The contractor has addressed and closed out all of the AR's from the above intensive audit activity.
- b. The contractor has initiated an aggressive program to close out open NR's. The downward trend in this contractor's open NR's has demonstrated the positive results of this effort.
- c. The nine non-compliances and sixteen unresolved items from the NRC inspection report 81-19 have been addressed and reviewed by the Construction Quality Section.

E. In regard to Functional Area 10, Radiological Protection, the following information is provided to demonstrate the improvements underway and the responsiveness of our organization to the issues and suggestions which evolved from the NRC inspections of this area.

1. The Health Physics staff was increased from 6 to 14 people which included the addition of 7 technicians and an ALARA Coordinator with a BS degree and two years commercial nuclear experience.
2. An additional unit supervisor has been hired for this activity as well. This individual has 16 years nuclear experience, including 8 years at a commercial BWR plant and has the experience requirements for Radiation Protection Manager.
3. Eight of the eleven technicians presently employed are former Navy nuclear engineering lab technicians (ELT's) who functioned as Chemical and H/P specialists on nuclear vessels.
4. Experience training has been completed by four technicians. This included the Unit Supervisor and the Plant Health Physicist who each spent two to four weeks at the Pilgram plant. Plans are also in process to increase the staff experience level in other ways. Four to eight technicians are working as H/P technicians at the Fitzpatrick and Vermont Yankee plants during the plant spring outages.

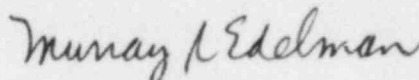
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5. We have now completed 26 Health Physics instructions compared to 6 at the time of the inspection. This represents approximately 65% of the total instructions needed.
6. Laboratory facilities have been completed and placed in service for initial operation. In addition, a calibration facility is being engineered and will be located in the Unit 1 Auxiliary Building at the 568' elevation.
7. The Eberline calibration is set up and available to calibrate survey instruments. The majority of the HP portable equipment already has been received and is also available in the HP Service Room.

In summary, the Project Health Physics Program has been strengthened substantially since the inspection. We will continue to maintain strong management attention to the staffing and experience levels, as well as program development efforts in this area.

My sincere appreciation again to you and your staff for their efforts on this SALP review.

Very truly yours,



M. R. Edelman
Vice President
Nuclear Group

MRE/llp

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

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