

AFFIDAVIT

I, Robert W. Schrauder, being duly sworn, state as follows:

1. I am Director, Perry Nuclear Services Department, at the Cleveland Electric Illuminating Company. My business address is 10 Center Road, Perry, Ohio 44081. As Director, Perry Nuclear Services Department, my duties include oversight of Regulatory Affairs, including the preparation of license amendment requests. A statement of my professional qualifications is attached hereto.

2. This Affidavit is submitted in support of Licensees' Cross Motion for Summary Disposition and Answer to Ohio Citizens for Responsible Energy, Inc. and Susan L. Hiatt Motion for Summary Disposition, and specifically addresses paragraph 3.b. in the December 27, 1993 Order issued by the Atomic Safety and Licensing Board.

3. Paragraph 3.b. of the Licensing Board's Order suggests that the parties respond to the following question:

Under Part 50, Appendix H, II., B., 1., are there any changes in the reactor vessel material surveillance program withdrawal schedule which would not be reflected in changes in the limiting conditions of operation of the Perry facility?

4. With the assumption that the reactor vessel material surveillance program withdrawal schedule has been removed from the technical specifications, the answer to this question is that there are changes in the withdrawal schedule which would not be reflected in changes to the technical specification limiting conditions of operation for the Perry facility.

5. At the present time, the Perry technical specifications include reactor vessel pressure versus temperature (P-T) limits (Tech Spec Figure 3.4.6.1-1 (Amendment 45)). This is the only technical specification limiting condition for operation which could be affected by a change in the withdrawal schedule. The Figure, as reflected in its title, is only valid up to eight effective full power years. Therefore a change, at least to the title of the Figure, will be necessary prior to exceeding eight effective full power years.

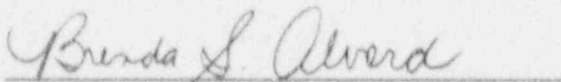
6. However, changing the title of Figure 3.4.6.1-1 will not necessarily require a change in the reactor vessel material surveillance program withdrawal schedule; nor would a change to the withdrawal schedule necessarily require a change to the title (or substance) of Figure 3.4.6.1-1.

7. For example, Licensees could process a License Amendment to change the title of Figure 3.4.6.1-1 and the associated P-T limit lines, so that the Figure would apply until the end of the current operating license term (i.e., 32 EFPY). This change could be made so long as the limit lines on the Figure were calculated in accordance with current regulatory guidance. The withdrawal schedule could subsequently be modified without requiring a Technical Specification change. No further changes to the Figure would be necessary during the life of the plant provided later information, such as analysis of surveillance specimens, did not require any change in the limit lines set forth in the Figure.



Robert W. Schrauder

Subscribed and sworn before me this
21st day of March, 1994.



Notary Public

My Commission expires 7-20-96

ROBERT W. SCHRAUDER
Perry Nuclear Power Plant
10 Center Road
Perry, Ohio 44081

Mr. Schrauder joined Centerior Energy in 1987 as the Nuclear Licensing Manager at the Company's Davis-Besse Nuclear Power Plant. In July 1993 Mr. Schrauder was promoted to Director of Nuclear Services at the Perry Nuclear Power Plant. His current responsibilities include Regulatory Affairs, Training, Security, Materials Management, and Administrative Services.

Mr. Schrauder has more than 15 years experience in the nuclear industry. His responsibilities have included acting as the Company's primary interface with the Nuclear Regulatory Commission and other regulators. He has also worked as a nuclear design engineer. Prior to joining Centerior he worked for Carolina Power and Light Company and the Bechtel Power Corporation.

A native of Cincinnati, Ohio, Mr. Schrauder obtained a Bachelor of Science Degree in Nuclear Engineering in 1978 from the University of Cincinnati. He served on active duty in the U.S. Naval Reserve from 1971-1973.

March 24 1994
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USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION '94 MAR 25 P3:47

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)
)
THE CLEVELAND ELECTRIC)
ILLUMINATING COMPANY, et al.) Docket No. 50-440-OLA-2
) ASLBP No. 90-605-02-OLA
(Perry Nuclear Power Plant,)
Unit No. 1))
)

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