



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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

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Dalwyn R. Davidson  
VICE PRESIDENT  
SYSTEM ENGINEERING AND CONSTRUCTION

October 8, 1982

Mr. C. E. Norelius, Director  
Division of Engineering and Technical Inspection  
U.S. Nuclear Regulatory Commission, Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

RE: Perry Nuclear Power Plant  
Docket Nos. 50-440; 50-441  
Response to I.E. Report

Dear Mr. Norelius:

This letter is to acknowledge receipt of Inspection Report Number 50-440/82-09; 50-441/82-08, attached to your letter dated September 10, 1982. This report identifies areas examined by Mr. D. H. Danielson and other members of your staff during the special safety inspection conducted from July 19 to 23, 26 to 30, and August 16 and 17, 1982.

Attachment A to this letter is our response to the one (1) Severity Level IV Violation described in the Notice of Violation, dated September 10, 1982. This response is in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. In addition, Attachment B includes information in response to the Unresolved and Open Items which were identified in your report.

Our response has been submitted to you within thirty days of the date of the Notice of Violation as you required, and the information submitted is true and correct to the best of my knowledge, information and belief. If there are additional questions, please do not hesitate to call.

Very truly yours,

D. R. Davidson  
Vice President  
Systems Engineering and Construction

DRD:pab  
Attachments

cc: Mr. M. L. Gildner  
USNRC, Site

Mr. R. L. Spessard, Director  
Division of Resident and Project Inspection  
U.S. Nuclear Regulatory Commission, Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

U.S. Nuclear Regulatory Commission  
c/o Document Management Branch  
Washington, D.C. 20555

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ATTACHMENT A

RESPONSE TO ENFORCEMENT ITEM

Below is our response to the Notice of Violation appended to United States Nuclear Regulatory Commission I.E. Report 50-440/82-09; 50-441/82-08.

I. Noncompliance 440/82-09-04; 441/82-08-04

A. Severity Level IV Violation

10CFR50, Appendix B, Criterion V states, "Activities affecting quality shall be prescribed...and shall be accomplished in accordance with these instructions, procedures or drawings."

The licensee's Corporate Nuclear Quality Assurance Program 0500, Revision 4, Section 1.1 states, "The Cleveland Electric Illuminating Company requires that activities affecting quality of safety-class structures, systems, and components shall be prescribed in and accomplished by documented instructions, procedures, and drawings."

Contrary to the above:

- a. On July 21, 1982, it was identified that Kaiser Engineers, Inc. did not maintain a "record of lead auditor qualifications." This is contrary to Revision 3 of their Procedure QAP No. 20.
- b. On July 22, 1982, it was identified that Pullman Power Products Corp. had safety-related piping stored without the ends being capped, and safety-related hangers were not stored on dunnage. This is contrary to their Procedure XIII-5.
- c. On July 22, 1982, it was identified that General Electric Company was storing a spool piece without the ends being capped. This is contrary to their Procedure GEP-G-0001.
- d. On July 28, 1982, it was identified that The Cleveland Electric Illuminating Company was not maintaining field stored equipment in accordance with the Field Storage Maintenance Request. This is contrary to their Procedure 3-1302.
- e. On July 20, 1982, it was identified that, Johnson Controls, Inc., was not maintaining field stored equipment in accordance with the licensee's Field Storage Maintenance Request. This is contrary to their Procedure QAS-1402-PNPP.
- f. On July 27, 1982, it was identified that The Cleveland Electric Illuminating Company was not including the persons contacted or an evaluation statement regarding the effectiveness of the quality assurance program elements which were audited in their audit reports. This is contrary to their Procedure 1-1806.

- g. On July 23, 1982, it was identified that The Cleveland Electric Illuminating Company was not keeping work areas sufficiently clean and orderly by removing trash in a prompt manner. This is contrary to their Procedure PAP-0206.
- h. On July 21, 1982, it was identified that Pullman Power Products Corp. was not protecting quality records from fire and humidity. This is contrary to their Procedure XVII-1.
- i. On July 21, 1982, it was identified that General Electric Company was not storing quality records to protect them from damage due to water and humidity. This is contrary to their Procedure GEP-GQI-0001.
- j. On July 27, 1982, it was identified that The Cleveland Electric Illuminating Company was not maintaining an up-to-date file of NRC inspection and enforcement document evaluations. This is contrary to their Procedure PAP-1601.

B. Response

The following information describes the corrective action for each condition identified above:

- a. The Lead Auditor's Qualification record was updated on July 29, 1982, based upon objective evidence that an adequate number of audits had been performed. Kaiser Engineer's Procedure QAP-22 has been revised to require that annual evaluation be performed in January of each year for all certified Lead Auditors.
- b. As indicated in the details of the inspection report, the conditions found were promptly corrected. Ongoing surveillance performed by the Construction Quality Section has indicated that the isolated conditions observed are not generic in nature. Nonetheless, increased surveillance has been implemented in the Pullman storage areas as a result of this concern.
- c. As indicated in the details of the inspection report, the condition identified above was promptly corrected. Ongoing surveillance performed by the Construction Quality Section has indicated that the isolated condition observed is not generic in nature. As a result of this concern, however, increased surveillance has been implemented in the General Electric storage areas.
- d. A detailed inspection was performed by the licensee on July 28, 1982, to determine whether or not the reported specific instances observed represented a hardware concern or program deficiency. The inspection was performed on randomly selected pieces of safety-related equipment throughout the plant. The inspection revealed no instances of failure to meet specified Field Storage Maintenance Requirements.

The specific examples identified in this report were resolved by correcting equipment protection or modifying the FSMRs to provide requirements applicable to the construction conditions.

To improve the coordination between FSMRs and current field conditions, the Project Maintenance activity has instituted a written feedback system to Engineering.

- e. The condition cited (i.e., holes in the plastic covering for Panel 1H22-P026) was corrected during the course of the inspection by replacing the plastic covering. Ongoing surveillance performed by the Construction Quality Section has indicated that the isolated condition observed is not generic in nature. As a result of this concern, however, increased surveillance has been implemented on Johnson Controls, Inc., maintenance activity.
- f. As described in the details of the inspection report, a recent revision to Procedure 1-1806 resulted in the inadvertent omission of detailed criteria clarifying the implementation of ANSI N45.2-12 for process audits. Procedure 1-1806 is being revised and is scheduled for final approval by October 29, 1982. Training will be conducted to the revised procedure prior to implementation, as required.
- g. Lumber, rags and other such items observed in the various plant areas by the Inspector have been removed. The Construction Quality Section personnel are utilizing an improved checklist as part of the routine surveillance of housekeeping during construction. Increased attention has been given to this area as a result of the concerns expressed.
- h. Pullman Power Products Corporation has implemented administrative controls in the records storage area and has physically segregated the records area from the general work areas. Restriction signs for smoking and eating have been posted. In addition, a dehumidifier and temperature monitoring unit were installed during the course of the inspection. Improved administrative controls will preclude concern with records protection.
- i. The General Electric Company will be providing cabinets to protect radiographs. The records vault has been re-evaluated and adequate drainage for water is available under the entrance doorway. In addition, a dehumidifier has been installed for humidity protection. The cabinets have been ordered and will be in place by October 29, 1982. These measures will exceed the minimum requirements of General Electric Procedure GEP-CQI-0001.
- j. The Licensing Engineering element will insure follow-up is documented on the outstanding IE Information Notices by November 15, 1982. The licensee's review of the follow-up process for IE Documents indicates that the lack of timeliness relates only to Information Notices. IE Bulletins and Circulars are being adequately tracked. The review of the documents is also per procedure. To improve timeliness and tracking, a computer system is now in place for follow-up on overdue responses.

ATTACHMENT B

RESPONSE TO UNRESOLVED AND OPEN ITEMS

The following information is provided to assist with resolution of the conditions set forth for future review:

- Open Item 440/82-09-01; 441/82-08-01

As stated, the Corporate Nuclear Quality Assurance Program of The Cleveland Electric Illuminating Company has been submitted to Licensing Branch No. 2, Division of Licensing, U.S. Nuclear Regulatory Commission (NRR). The revision discussed was transmitted on September 22, 1982. This matter was also discussed with the Regional NRC Inspector on August 20, 1982.

- Open Item 440/82-09-02; 441/82-08-02

Review was conducted of the Corporate Nuclear Quality Assurance Program vs. the requirements established by contract (SP-709). No changes were determined to be necessary.

- Open Item 440/82-09-03; 441/82-08-03

The Pullman QA Manual was revised on August 30, 1982, to incorporate clarification of responsibilities under the QA Manager. The draft revision was reviewed by the NRC Inspector August 16-17 and accepted.

- Unresolved Item 440/82-09-05; 441/82-08-05

Nuclear Test Section Instruction 61-0507 was revised to incorporate the ANSI N45.2.1 requirements for capping of flush connections under NTS jurisdiction.

- Open Item 440/82-09-06; 441/82-08-06

Pullman Power Products Procedure XV-2 will be revised by November 1, 1982, to incorporate the program enhancement observed by the NRC Inspector.

- Unresolved Item 440/82-09-07; 441/82-08-07

After completion of the NRC Inspector's planned review of documentation and interfaces at GAI, as discussed in the report, this item may be resolved.

- Unresolved Item 440/82-09-08; 441/82-08-08

CEI and GAI personnel met in Region III offices on September 21, 1982, to discuss evaluation of the PNPP design control program and procedure modification and clarification.

- Open Item 440/82-09-09; 441/82-08-09

The results of the compression strength test for the Unit 2 steam tunnel placement requested by the Inspector will be available on October 25, 1982, and results will be communicated to him at that time.

- Unresolved Item 440/82-09-10; 441/82-08-10

The contractor has provided additional training for the Receipt Inspection personnel who expressed concern. Additional limits are being placed on certifications being provided for those task specific areas that do not involve a wide variety of skills. Thus, the training, certification and inspection job functions have been more closely correlated.