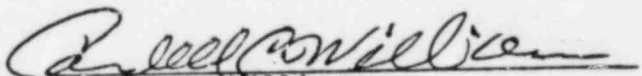


6. Region III of the NRC Staff issued an Immediate Action Letter dated February 8, 1978 because significant deficiencies in site construction practices and construction quality assurance (QA) were discovered by the Region III staff during inspections at the Perry site in January and early February 1978.
7. Applicants took actions to correct those deficiencies. Those actions included (1) a complete revision of the Perry construction QA program from the corporate level to the detailed working level; (2) a restructuring of the applicant's QA/QC organization; including the replacement of a number of management level QA/QC personnel with more experienced individuals; and (3) a major change in the site construction organization to provide more effective control of site contractor and subcontractor operations.
8. Concurrently the Region III Staff initiated an augmented inspection program for Perry to (1) review in detail the revised QA construction program, (2) ensure that the requirements of the new program were effectively implemented, and (3) ensure that the construction which had been completed under the previous program was acceptable. That augmented inspection program, which continued for a year and a half, showed that the construction QA program and construction practices at Perry had improved substantially because of the applicant's aggressive corrective actions and that construction which had been completed under the previous program was acceptable.
9. Although a number of discrepancies and noncompliances have been identified by the Region III Staff in inspection reports issued since February 8, 1978, none have been viewed by the Region III Staff

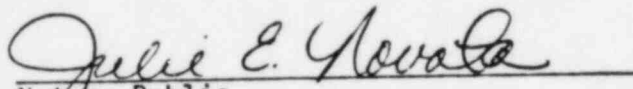
as resulting from a breakdown in the Licensee's construction QA program. In fact, many were identified and all were or are being resolved by the QA program.

10. Moreover, none of the discrepancies or noncompliances identified since correction of the deficiencies in construction practices and QA that led to issuance of the February 1978 Immediate Action Letter are viewed by the Region III Staff to be related to a failure to correct those earlier deficiencies identified in construction practices or QA.


James E. Konklin


Cordell C. Williams

Subscribed and sworn to before
me this 22nd day of October, 1982.


Notary Public

My commission expires: _____

My Commission Expires April 10, 1985

CORDELL C. WILLIAMS

Organization: Region III

Title: Chief, Plant Systems Section

Grade: GS-15

Birth Date: 11/28/39

Education: Cumulative 2 years college, University of Texas,
Austin, Texas
Contra Costa College, Contra Costa, CA (Engineering)
Numerous engineering specialty courses associated
with AEC/NRC, US Navy regarding construction and
operation of Nuclear Power Plants.

Experience:

1/24/82-Present Chief, Plant Systems Section - Engineering Inspection
Branch. Supervises engineering support inspectors
with responsibility for program inspections, invest-
igations, and inquiries to determine, for facilities
under Construction and Operations, if management's
operations and construction are accomplished in a
manner to protect health and safety of the public.
Recommend action to cause a licensee to achieve
compliance with requirements.

1960-Present Cumulative 22 years experience in heavy/nuclear
construction, involving quality assurance/quality
control and non-destructive testing. 12 years
direct experience in nuclear reactor construction
inspection with AEC/NRC involving QA, NDE, Welding,
civil and structural considerations.

JAMES E. KONKLIN

Organization: U. S. Nuclear Regulatory Commission
Region III

Title: Chief, Reactor Projects Section 1A

Grade: GS-15

Birth Date: April 5, 1935

Education: B. S., Engineering Physics, University of Oklahoma, 1958
Westinghouse Bettis School of Reactor Technology,
Certificate, 1959

Experience:

1981 - Present Chief, Reactor Projects Section 1A, Division of Resident and Project Inspection - Responsible for coordinating and controlling inspection and enforcement activities related to construction and operation of assigned nuclear power plants. Supervises seven resident inspectors. Represents the NRC to state and local officials and the news media.

2/1981 - 12/1981 Acting Chief, Reactor Projects Section 2A, Division of Resident and Project Inspection - Responsible for coordinating and controlling inspection and enforcement activities related to construction and operation of assigned facilities. Supervises seven resident inspectors and one project inspector.

1977 - 2/1981 Project Inspector - Construction Project Section - Responsible for inspection and reporting of licensee work activities and documentation related to the construction of nuclear facilities. (NRC)

1968 - 1977 Branch Chief, Idaho Operations Office - Supervised four to seven project engineers in various branches, including the Project Management Branch (1974-1976). (ERDA/AEC)

1966 - 1968 Project Engineer - Idaho Operations Office - Responsible for control of contractor activities related to design and construction of the Loss of Fluid Test (LOFT) Facility. (AEC)

1965 - 1966 Chief, Isotopic Development Programs Branch, New York Operations Office - Supervised six project engineers and contract administrators in controlling contractor R&D activities. (AEC)

1962 - 1965 Senior Research Engineer - Responsible for analyses of advanced nuclear space power systems. (Atoms International)

1958 - 1962 Lead Engineer - Primary components, naval reactors. Responsible for controlling design and procurement of major naval nuclear plant components. (AEC/Navy)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

CLEVELAND ELECTRIC ILLUMINATING
COMPANY, ET AL.

(Perry Nuclear Power Plant,
Units 1 and 2)

Docket No. 50-440 OL
50-441 OL

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S MOTION FOR SUMMARY DISPOSITION OF ISSUE NO. 3" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, by deposit in the Nuclear Regulatory Commission's internal mail system, this 29th day of October, 1982:

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Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

*Mr. Frederick J. Shon
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Appeal Board Panel
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James M. Cutchin, IV
Counsel for NRC Staff