



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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Dalwyn R. Davidson  
VICE PRESIDENT  
SYSTEM ENGINEERING AND CONSTRUCTION

October 29, 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  
Final Report on Valve  
Identification and Traceability  
[RDC 48(82)]

Dear Mr. Keppler:

This letter serves as a Final Report pursuant to 10CFR50.55(e) concerning identification and traceability of installed safety-related valves. Initial notification concerning our evaluation of this problem was made on March 4, 1982, to Mr. J. E. Konklin of your office by Mr. R. L. Vondrasek of The Cleveland Electric Illuminating Company (CEI). Our Interim Report on this subject, dated March 25, 1982, identified July 30, 1982, as the date for completion of our evaluation. This subsequently changed to October 31, 1982, as discussed by Mr. P. Pelke and Mr. R. L. Vondrasek during a telephone call on July 30, 1982.

This report contains a description of the deficiency, an analysis of the safety implications and the corrective action taken.

## Description of Deficiency

Effective measures had not been established or implemented to provide assurance that valves issued to our prime piping contractor were totally traceable by Master Parts List Number, Bill of Material Number, or Serial Number from fabrication documentation to final installation.

Correlation of valve serial numbers and related vendor documentation to the Master Parts List Number tags attached by Project Organization at time of issuance to the installing contractor was not performed consistently. This problem was recognized when valves which had been issued to the field were found to have been improperly tagged or in several cases to have no tag.

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Analysis of Safety Implication

Our evaluation of the deficiency per 10CFR50.55(e) has been completed, and we have concluded that we were not in full compliance with 10CFR50, Appendix B, Criterion VIII. While no significant safety-related valve installation problems were found, it could be postulated that had this problem gone uncorrected, unique valve identification might not have been maintained. A valve subsequently identified as potentially defective could not then have been readily located and safe operation of its system would not be assured.

Corrective Action Taken

Upon identification of the deficiency, PNPP Nonconformance Reports were initiated to document the existing discrepancies. Issuance of safety-related valves to the prime installing contractor and related contractors was halted until applicable procedures for identification and traceability of components had been reviewed and necessary revisions made.

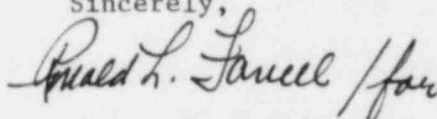
Provisions were made to adequately address the control of material issued to the field. The prime piping installation contractor's Quality Assurance Program was revised to assure component identification and traceability to a unique document package through installation. Issuance of valves was resumed March 18, 1982.

A complete review of all safety-related valves already installed or released for installation to the prime piping installation contractor, and interfacing contractors as required, was performed by PNPP Project Organization personnel. This involved approximately 1,850 valves and all discrepancies identified were evaluated. Required corrections will be completed by December 17, 1982.

Finally, verification of implementation of revisions made to the prime installing contractor's procedure was performed by the Construction Quality Section.

If there are any questions, please feel free 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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