

DISTRIBUTION:  
 (Document Control 50-440/441)  
 NRC PDR  
 L PDR  
 NSIC  
 PRC System  
 LB#1 Rdg  
 MRushbrook  
 JStefano  
 Attorney, OELD  
 ACRS (10)  
 ELJordan, DEQA:IE  
 JMTaylor, DRP:IE

MAR 07 1983

Docket Nos.: 50-440  
 and 50-441

Mr. Murray R. Edelman  
 Vice President - Nuclear Group  
 The Cleveland Electric Illuminating Company  
 P. O. Box 5000  
 Cleveland, Ohio 44101

Dear Mr. Edelman:

Subject: Further Request for Clarification and Additional Information  
 Pertaining to the QA-List for Perry Nuclear Power Plant  
 (Units 1 and 2)

NRC letter dated October 19, 1982 (A. Schwencer to D. R. Davidson) requested clarification and additional information pertaining to the Perry QA-list documented in Amendments 8 and 9 of the FSAR. This letter addresses CEI's responses to the questions asked (Questions 260.10 through 260.14) with your letter dated December 21, 1982.

Enclosed is the staff's findings and position based on its review of your December 21 responses, indicating the extent they have been found acceptable. Also enclosed are new Questions 260.15 through 260.18 which must be addressed in order for the NRC staff to satisfactorily close this item. Question 260.15 identifies responses to Questions 260.11 through 260.13, all of which or in part necessitates further clarification and/or additional information. The extent to which further clarification and additional information is requested in the enclosure was discussed with your staff in telephone conversations held on February 10 and 16, 1983. Therefore, this letter also serves to formally document those discussions in the form of the enclosed questions.

It is our understanding that there may be some disagreement with the NRC staff's position concerning what equipment should be included in the QA list; for example, where nonsafety-grade equipment may be involved. If, after reviewing the enclosed questions, there are in fact any disagreements, the basis for the disagreements, and your position concerning them, should be fully defined and detailed in responding to the enclosed questions.

OFFICE							
SURNAME		8303290789	830307				
DATE		A	PDR	ADOCK	05000440		
			PDR				

Please advise the project manager, John Stefano, within seven days after receipt of this letter, when we may expect to receive your responses.

Sincerely,

151

B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing

Enclosure:  
As Stated

cc w/encl.: See next page

OFFICE	DL:LB#1	DL:LB#1					
SURNAME	JStefano:cw	BJYoungblood					
DATE	3/7/83	3/7/83					

Mr. Murray R. Edelman  
Vice President, Nuclear Group  
The Cleveland Electric Illuminating Company  
P. O. Box 5000  
Cleveland, Ohio 44101

cc: Jay Silberg, Esq.  
Shaw, Pittman, Potts & Trowbridge  
1800 M Street, N. W.  
Washington, D. C. 20006

Donald H. Hauser, Esq.  
The Cleveland Electric Illuminating Company  
P. O. Box 5000  
Cleveland, Ohio 44101

Resident Inspector's Office  
U. S. Nuclear Regulatory Commission  
Parmly at Center Road  
Perry, Ohio 44081

U. S. Nuclear Regulatory Commission  
Mr. James G. Keppler, Regional  
Administrator, Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Donald T. Ezzone, Esq.  
Assistant Prosecuting Attorney  
105 Main Street  
Lake County Administration Center  
Painesville, Ohio 44077

Daniel D. Wilt, Esq.  
P. O. Box 08159  
Cleveland, Ohio 44108

Ms. Sue Hiatt  
OCRE Interim Representative  
8275 Munson  
Mentor, Ohio 44060

Terry Lodge, Esq.  
915 Spitzer Building  
Toledo, Ohio 43604

John G. Cardinal, Esq.  
Prosecuting Attorney  
Ashtabula County Courthouse  
Jefferson, Ohio 44047

Staff Position  
Perry Nuclear Power Plant

260.0           Quality Assurance

260.14           The response to the following questions are acceptable. They need to be incorporated into Table 3.2-1 as committed to by CEI in each response.

<u>Response to Question</u>	<u>Table 3.2-1 Location</u>	<u>Item (Comment)</u>
260.10	XXIX 12	Diesel generator jacket water cooling (Safety Class column is blank per Amendment 8. Needs to show Safety Class 3 per response.)
260.10	XXXIV 15	Spent fuel pool and liner (Safety Class column is blank per Amendment 8. Needs to show Safety Class 2 per response.)
260.10	XXXIV 17	Foundation for seismic category I electrical duct banks and manholes (Same comment as for XXXIV 15.)
260.11	Note 1	Clarification that valve operators are implicit in the entry for valves. (Note 1 of Table 3.2-1 needs to be revised per the response.)
260.12	I 6	Reactor internal structures, other (The response indicates an acceptable note regarding QA will be added to the table, and this needs to be done. Also, FSAR Amendment 8 changed the seismic category from I to N/A. This change is contrary to Regulatory Guide 1.29 and is unacceptable to the staff.)
260.12	III 6	Pump motors (The response states: "A note will be added to Table 3.2-1 stating that the pump motors are subject to General Electric's QA Program requirements during design, fabrication and installation. Pump motors will be subject to the pertinent provisions of 10 CFR 50, Appendix B during the operations phase." We will require that the second sentence be included in the note.)

<u>Response to Question</u>	<u>Table 3.2-1 Location</u>	<u>Item (Comment)</u>
260.12	XXXII 9	A-C control power inverters (Safety Class column shows NSC per Amendment 8. Needs to show Safety Class 2 per response.)
260.12	XXXII 11	Fire Stops (New note needs to be added per the response and referenced at item XXXII 11.)
260.12	XXXV 1.f	Fire control dampers (New note needs to be added per the response and referenced at item XXXV 1.f)
260.13	XXXVI	Other components (Items need to be returned to Table 3.2-1.)

260.15 The responses to the following questions need clarification or correction as noted.

<u>Response to Question</u>	<u>Table 3.2-1 Location</u>	<u>Item (Comment)</u>
260.11.c.1	XXI 3	Safety parameter display system - SPDS (The staff requires a commitment that the SPDS will be subject to the pertinent provisions of CEI's 10 CFR 50 Appendix B QA program during the operations phase.)
260.11.c.8	Noted	Additional accident monitoring instrumentation (The response needs clarification in that safety class category "2 (electrical)" is not defined and the response to 6 items appears to fall into 7 references. Also, the references made in the response should show all items as being subject to the pertinent provisions of CEI's 10 CFR 50 Appendix B QA program during the operation phase.)
260.12	XXXII 6 & XXXIII 4	Conduits, etc. (The response to both items omitted cable trays and should be revised to include cable trays. New note needs to be added per the response and referenced at both Table 3.2-1 locations.)

260.16 FSAR Table 3.2-1 items XIII, Fuel Service Equipment; XIV, Reactor Vessel Service Equipment; and XVI 3, Fuel Transfer System were revised in Amendment 8 to now reference FSAR Tables 9.1-3, 9.1-5, and 9.1.4, respectively. These tables do not explicitly show which items are subject to CEI's 10 CFR 50 Appendix B QA program during the operation phase. These tables should explicitly show this information or the information should be included in Table 3.2-1 where it originally was. The following items were shown to be subject to CEI's 10 CFR 50 Appendix B QA program during the operations phase, and the staff position is that they should continue to be shown in this manner:

- Fuel preparation machine
- General purpose grapple
- Dryer and separator sling and head strongback
- Fuel transfer system

260.17 The response to 260.a.6 indicates that the diesel generator intake air filter and exhaust silencer will not be subject to the pertinent requirements of CEI's 10 CFR 50 Appendix B QA program during the operations phase. This is reflected in Table 3.2-1, item XXIX 11 which shows these items as safety class NSC per FSAR Amendment 8. The staff position is that these items should be subject to the pertinent requirements of CEI's 10 CFR 50 Appendix B QA program during the operations phase. (Our original review of these items did not catch this shortcoming and CEI has not been informed of our objection to the 260.a.6 response.)

260.18 FSAR Table 3.2-1 was revised by Amendment 8 to include the items listed below. The staff position is that these items should be subject to the pertinent requirements of CEI's 10 CFR 50 Appendix B QA program during the operations phase. The table should be so revised.

XL 6	Drywell atmospheric radiation monitors
XL 7	Containment atmospheric radiation monitors
XL 8-12	Portable radiation monitors
XL 13	Control room airborne radiation monitors
XLI A11	Area radiation monitors
XLVII A11	Portable radiation monitoring equipment
XLVIII	TSC & EOF airborne and area monitors

We note that page Q&R 17.2-14 of FSAR Amendment 9 addressed these items by stating: "These items are covered by plant operating procedures and administrative controls and are not included in Table 3.2-1 (see NOTE 1)." NOTE 1 states (page Q&R 17.2-13) that "These procedures and controls ... are ... controlled ... by the pertinent requirements of the operational quality assurance program (Chapter 17)." Table 3.2-1 should reflect this commitment for these items.