



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

September 27, 1983

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
NAMCO Limit Switches
[RDC 26(81)]

Dear Mr. Keppler:

This letter serves as our Final Report pursuant to 10CFR50.55(e) concerning NAMCO Controls limit switches which were manufactured to an inadequately implemented Quality Assurance Program. This problem was originally identified to Mr. R. Landsman at your Region III office on February 10, 1981, by Mr. W. J. Kacer of The Cleveland Electric Illuminating Company. Previously submitted interim reports were transmitted on February 11, 1981; August 28, 1981; and October 29, 1982.

This report contains a Description of the Deficiency, an Analysis of Safety Implications and the Corrective Action Taken.

Description of Deficiency

The Cleveland Electric Illuminating Company (CEI) awarded procurement specifications to various valve vendors for the fabrication of equipment to be installed in the Perry Nuclear Power Plant. These specifications required our vendors to procure NAMCO limit switches, Model EA 180 and EA 740 to be installed on some of these valves. As a result of an audit conducted by CEI Quality Assurance, it was determined that the overall NAMCO Controls Quality Assurance Program was inadequate in implementing requirements defined by their Quality Assurance Manual, 10CFR50, Appendix B, and CEI's Quality Assurance requirements.

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Analysis of Safety Implications

Without an adequate NAMCO Quality Assurance Program, there is no assurance that the product CEI has received was fabricated the same as the prototype which NAMCO qualified to IEEE 323. Without an effective quality program implemented on the fabrication of the NAMCO limit switches, CEI could not place any credibility in NAMCO's Certificate of Compliance supplied with the limit switches.

Corrective Action Taken

The following serves as a summation of the corrective actions which have been completed, including the steps taken to prevent inadvertent use of questionable limit switches. Also reflected are the steps taken to verify that an effective and implemented Quality Assurance Program, consistent with the requirements of 10CFR50, App. B, was in place at NAMCO Controls during the manufacture of limit switches procured directly by CEI.

Initially, the questionable limit switches procured from NAMCO by CEI's vendors, to be used in a safety-related application, were and remain tagged "nonconforming" and placed on hold to prevent inadvertent use. This was done in accordance with Project Administration procedures for the control of nonconforming items.

A Bill of Material specification (SP793-05-4549-00) was developed, reviewed, approved and issued for the procurement of NAMCO limit switches. This specification identified specific quality assurance requirements to be implemented by NAMCO Controls prior to and during the manufacturing cycle of the limit switches. The Quality Assurance Program requirements included specific procedures and documentation to be submitted for review and approval prior to and at the completion of manufacture.

A pre-award survey was conducted July 28 and 29, 1981, at the NAMCO Controls facility in Jefferson, Ohio. The purpose of this survey was to assess the adequacy, effectiveness and implementation of NAMCO's revised Quality Assurance Program. In general, conditions were found to be acceptable, however, several deficiencies were noted. These deficiencies were documented and subsequently resolved.

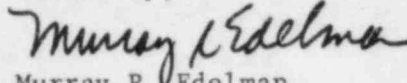
After review of NAMCO's pre-manufacturing cycle documents, a fabrication release was issued to NAMCO on April 15, 1982. The entire fabrication and assembly process was witnessed by a Perry Project Inspector. The results of this inspection trip were documented in inspection trip report 090-1 dated May 3, 1982. In addition, an on-site receiving inspection was conducted and documented in accordance with Project Administration procedures.

At present, installation of the limit switches is being directed by the Nuclear Construction Engineering Section of the Project Organization. The NAMCO Controls' qualification test plans are currently being reviewed by GAI Engineering. Testing is expected to begin at the end of September 1983 and scheduled to be completed in July 1984.

In reviewing the correspondence on this subject, it has been determined that all corrective actions necessary for resolution of the reported deficiency have been completed. The issuance of a final report concerning this matter, therefore, is not being delayed pending completion of the qualification program or replacement of the questionable limit switches.

Please call if there are any additional questions.

Sincerely,



Murray R. Edelman
Vice President
Nuclear Group

MRE:pab

cc: Mr. M. L. Gildner
NRC Site Office

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