



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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

*Serving The Best Location in the Nation*

DmB

April 25, 1984

MURRAY R. EDELMAN

VICE PRESIDENT  
NUCLEAR

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  
ASME Class 1 Supports [RDC 90(84)]

Dear Mr. Keppler:

This letter serves as our final report pursuant to 10CFR50.55(e) concerning material purchased and designated for installation on ASME III Class 2 and Class 3 supports/hangers which was subsequently installed in Class 1 supports/hangers. Initial notification that this problem was being evaluated by The Cleveland Electric Illuminating Company (CEI) was made to Mr. P. R. Pelke of your office on January 12, 1984, by Mr. E. Riley of CEI. Our interim report on this subject was filed February 10, 1984.

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

## Description of Deficiency

One hundred sixteen (116) ASME Class 1 supports installed by Pullman Power Products (PPP) under the SP44-4549-00 contract were identified as having material in their construction which is qualified for use in ASME Class 2 or 3 supports. This occurred because a change was made in procurement requirements which was not identified by the piping installation contractor at receipt inspection nor reflected in his material control procedures.

## Analysis of Safety Implication

All material used was, as a minimum, acceptable for ASME Class 2 and 3 construction. There is no evidence that the identified deficiencies compromise the design/functional integrity of the supports; nevertheless, the problem does represent a failure in the Contractor's quality program in that the necessary requirements of NA-3700 were not met. Therefore, for all 116 affected supports, the material in question is being replaced.

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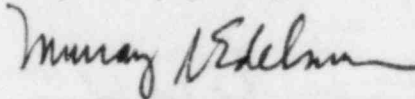
Corrective Action

A complete review of all Class 1 supports was performed by the Contractor with results indicating that 116 installed/fabricated supports did not have proper material certification. Nonconformance Reports were generated by the Contractor for items that were determined to be in violation of quality requirements. Additionally, PPP Corrective Action Request 006 was generated to document the programmatic deficiencies. Corrective Action resulting from CAR 006 included revision of two PPP procedures (IV-34 Site Purchasing and X-5 Field Receiving Inspection). Revision of the procedures clarified procurement requirements and provided for more detailed receipt inspection. Both revised procedures have been accepted by the Project Organization. A Class 1 material identification and control log was also established listing all acceptable material. Only material listed in the log is issued to construction for installation in Class 1 supports. This is verified and documented by PPP QA/QC personnel during review of the material requisitions.

Implementation of this system has prevented problems of this nature from recurring. Completion of all work required to close the Nonconformance Reports is presently scheduled for January 4, 1985.

If there are additional questions, please do not hesitate to call.

Very truly yours,



M. P. Edelman  
Vice President  
Nuclear Group

MRE:pab

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

Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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

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*Warnick/Ruth*

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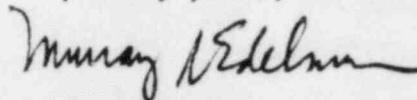
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