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# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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June 29, 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  
Numerous Deficiencies Associated  
With Limitorque MOV Actuators  
[RDC 100(84)]

Dear Mr. Keppler:

This letter serves as the final report pursuant to 10CFR50.55(e) relative to deficiencies detected during the Phase III Limitorque Actuator Rework Program conducted at PNPP. Mr. R. Knop of your office was first notified on March 16, 1984, by Mr. E. Riley of The Cleveland Electric Illuminating Company (CEI) that preliminary results of the rework program in progress revealed numerous deficiencies which were being evaluated. Previously we submitted an interim report on April 12, 1984.

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 Co. (CEI) and Gilbert/Commonwealth Inc. (G/C Inc.) developed a program to rework safety-related Limitorque actuators with the objective of satisfying equipment qualification requirements and providing maximum operating reliability.

The program was completed in three (3) phases with Phase I consisting of a walkdown to obtain all qualification data and identify any obvious deficiencies. Phase II involved evaluating the results and developing rework procedures and Phase III consisted of the actual disassembly, rework and re-assembly of the actuators. During the performance of Phase III for Unit 1 and Common, an interim trend analysis was conducted on required rework actions and identified equipment/material deficiencies such as damaged wiring, inadequate crimping, cracked limit-switch rotors and missing/damaged mechanical parts.

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Analysis of Safety Implication

Due to the nature and number of identified actuator deficiencies, it was postulated that some actuators may have been prevented from operating. As these actuators are used in several systems essential to safe shutdown of the reactor, one or more of these systems may have been precluded from operating.

Any other corrections of the operators included in our preliminary evaluation which were due to desired engineering changes, normal maintenance items or attributable to the actual rework program itself have now been determined not to be subject to reportability evaluation.

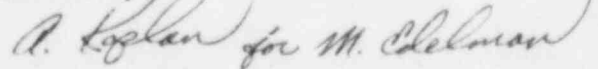
Corrective Action Taken

Deficiencies related to Unit 1 and Common Limitorque<sup>®</sup> MOV actuators have been corrected in accordance with the provisions of Special Project Plan (SPP) 1607, "Procedure for Rework of Safety-Related Limitorque Actuators", except for four actuators in the N11 system, which will be replaced in their entirety and any new work that is resulting from ongoing construction activities. New/replacement actuators for Unit 1 and Common will be reworked in accordance with SPP 1607. In addition, to assure the acceptability of spare and replacement parts, manufacturing surveillance by Gilbert/Commonwealth Inc. inspection personnel was initiated at Limitorque's Lynchburg, Virginia facility.

Reinspection and required correction of the Unit 2 MOV actuators will be tracked on Nonconformance Report OQC-0782 based upon their indeterminate status. Resolution of this nonconformance report will be completed as indicated by the Unit 2 construction schedule.

Please call if there are any additional questions.

Sincerely,



Murray R. Edelman  
Vice President  
Nuclear Group

MRE:pab

cc: Mr. J. A. Grobe  
NRC Site Office

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