

SEP 25 1984

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: Results of NRC Staff Review of Chapter 17 of the Perry Nuclear
Power Plant (Units 1 and 2) FSAR, Amendments 13 and 14

In the process of its review of the Perry FSAR, Amendments 13 and 14, the staff has identified QA organizational changes and changes in CEI's commitments to QA regulatory guides which need to be reflected in the Perry SER and/or will require further CEI response. Enclosure (1) references a change in the QA organization made in FSAR Amendment 14, which will be appropriately reflected in the next Perry SER supplement. Enclosure (2) reflects open items regarding CEI's commitment to regulatory guides for QA. Unless the open items addressed in Enclosure (2) are satisfactory resolved, they will be documented as open unresolved QA issues in the next Perry SER supplement. A tentative date for issuance of the next SER supplement is scheduled for December 1984.

Please advise the Perry Project Manager, John J. Stefano, when we may expect to receive your response to the Enclosure (2) open issues items within 7 days after receipt of this letter.

Sincerely,

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

Enclosures:
As stated

cc: See next page

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9/15/84

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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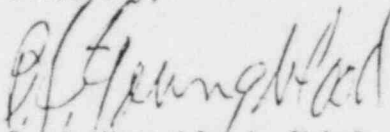
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Enclosures:
As stated

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Perry Nuclear Power Plant

QA Branch SSER Input

17 QUALITY ASSURANCE .

FSAR amendment 14 (August 22, 1984) describes a revised organization for the operations phase of the Perry plant such that Figure 17.1 of Perry SSER 4 is outdated in some respects. However, the reporting relationship, the organization, the responsibilities, and the authority of of CEI's Nuclear Quality Assurance Department are those shown in SSER 4 except the Operations Quality Section is now called the Operational Quality Section. CEI's overall organization is addressed in Section 13.1 of this SSER.

Perry Nuclear Power Plant

QA Branch Open Item

FSAR amendment 13 deleted table 17.2-1 concerning the licensee's commitment to regulatory guides concerning QA, and it referred to FSAR table 1.8-1 for this information. FSAR amendment 14 revised the licensee's commitments to these regulatory guides. The QA Branch review of FSAR table 1.8-1 (through amendment 14) has resulted in the following items which need to be addressed by the licensee.

1. The commitment to Regulatory Guide 1.33 has been replaced by a commitment to ANSI N18.7-1976 with an added clarification. The clarification is acceptable, but the commitment must be to the regulatory guide rather than to the ANSI standard referenced in the guide.
2. The commitment to Regulatory Guides 1.37, 1.38, and 1.94 has been limited to "activities comparable in nature and extent to construction phase activities." This limitation is acceptable, but the commitment must be to the regulatory guide rather than to the ANSI standard referenced in the guide.
3. The commitment to Regulatory Guide 1.39 appears to have been inadvertently deleted by FSAR amendment 14. The FSAR must address this regulatory guide. If cleanliness zones are designated, the cleanliness requirements of each zone should be described briefly.

4. The second clarification to Regulatory Guide 1.58 refers to the ANSI/ASME standard and fails to recognize sections C.5 and C.6 of the regulatory guide. The clarification should address these regulatory guide sections. For clarity, the third clarification needs to indicate to what personnel performing quality verification activities during operations the regulatory guide does not apply. The clarification should also indicate the qualification requirements for these personnel.

5. Although clarifications of Regulatory Guide 1.88 are given, there is no commitment to the guide. Such a commitment is required. For exception 2, clarify what requirements of the standard are not being met.

6. The phrase, "to the extent required by ANSI N45.2.8," regarding the commitment to Regulatory Guide 1.116 is confusing and should be eliminated or explained. A suggested rewording is "PNPP conforms to this guide with the following exceptions to ANSI N45.2.8:" For exceptions 1 and 2, clarify what requirements of the standards are not being met. Exception 3 should reference the regulatory guide rather than ANSI N45.2.8.

7. Regarding the first clarification to ANSI N45.2.13 (Regulatory Guide 1.123), CEI should describe how it assures that the supplier knows the potential ramifications of "use-as-is and "repair" decisions.