

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

July 26, 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 Electrical Penetrations (1R72) Potential Defect Concerning ASME Section III Material [RDC 81(83)]

Dear Mr. Keppler:

This letter serves as our final report pursuant to 10CFR50.55(e) on the potential defect associated with the Class IE electric penetrations (1R72) furnished by Westinghouse Electric Corporation. Mr. J. Konklin of your office was notified on August 24, 1983, by Mr. E. Riley of The Cleveland Electric Illuminating Company that this problem was being evaluated Our interim reports on this subject were dated September 15, 1983; December 1, 1983; and April 3, 1984.

Our evaluation has determined that this potential defect is not reportable pursuant to the requirements of 10CFR50.55(e).

Description of Deficiency

Westinghouse Electric Corporation supplied Class IE electrical penetrations to the Perry Nuclear Power Plant (PNPP) under procurement specification 563. This specification requires that materials for pressure retaining parts of the electrical assembly be in accordance with ASME Section III, Subsection NE. Twenty-six penetrations were identified containing bulkhead material of indeterminate status relative to procurement requirements of ASME Section III.

Completion of Reportability Evaluation

A review of the procurement and handling history of the material was made by Perry Nuclear Power Plant Project personnel during a September 21, 1983, meeting with Westinghouse. It was concluded from that meeting that ASME Code Case N242 could be utilized. Confirmation that the bulkhead material was

8408090261 840720 PDR ADDCK 05000440 PDR

JUL 30 1984

that as represented by the material test report was needed. Because all bulkhead material in question was from one material heat number, samples were removed from three of the affected penetrations and a chemical analysis performed. Review of the results of the chemical analysis by Project Organization confirmed that the material is as represented by the original material test report.

With these results, it is our intention to utilize ASME Code Case N242 for the bulkhead material. Engineering Change Notice 21802-363-05 has been initiated to revise the original procurement specification to permit the use of the Code Case and documentation update as required. The additional requirements identified in the United States Nuclear Regulatory Commission Regulatory Guide 1.85 for use of the Code Case will be complied with.

Project Organization Nonconformance Report OPQC 480 had been written to identify the indeterminate status of the bulkhead material and will remain open until all action is completed.

Please call if there are any additional questions.

Sincerely, numfilelma

Murray R. Edelman Vice President Nuclear Group

MRE:pab

cc: Mr. J. A. Grobe NRC 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

Records Center, SEE-IN Institute of Nuclear Power Operations 1100 Circle 75 Parkway, Suite 1500 Atlanta, Georgia 30339