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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

August 17, 1984

Mr. R. F. Warnick, Chief
Projects Branch I
Division of Reactor Projects
U.S. Nuclear Regulatory Commission, Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

RE: Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441

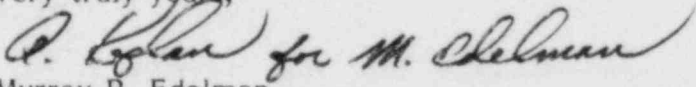
Dear Mr. Warnick:

This letter is to acknowledge receipt of Inspection Report Number 50-440/84-09; 50-441/84-09 attached to your letter dated July 18, 1984. This report identifies areas examined by Messrs. J. A. Grobe and M. L. Gildner during their inspection conducted May 1 through June 30, 1984, at the Perry Nuclear Power Plant.

Attached to this letter is our response to the Notice of Violation dated July 18, 1984. This response is in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations.

Our response has been submitted to you within thirty days of the date of the Notice of Violation as you required. If there are additional questions, please do not hesitate to call.

Very truly yours,


Murray R. Edelman
Vice President
Nuclear Group

MRE/pkr

Attachment

cc: Mr. J. A. Grobe
USNRC Site

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

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RESPONSE TO ENFORCEMENT ITEMS

Below is our response to the Notice of Violation appended to United States Regulatory Commission I.E. Report 50-440/84-09; 50-441/84-09.

I. Noncompliance 440/84-09-03

A. Severity Level V Violation

10CFR50, Appendix B, Criterion V, as implemented through the applicant's Corporate Nuclear Quality Assurance Program, Section 0500, Revision 6, requires that activities affecting the quality of safety-class systems be accomplished in accordance with documented instructions. Nuclear Test Section Instruction No. 61-1402, Revision 1, "Control of Mechanical Foreign Items", requires that mechanical foreign items (MFI) introduced into a system be identified with a properly initiated MFI tag and placement of the MFI tag documented in an MFI logbook.

Contrary to the above, MFI Tag No. 868 documenting the installation of a temporary gauge in the Low Pressure Core Spray System was not entered into the MFI logbook and MFI Tag No. 881 documenting the installation of temporary tubing and a temporary gauge in the Unit 1 High Pressure Core Spray System was not properly initiated in that the installation date and individual's name was not recorded on the tag.

B. Response

I. Corrective Action Taken and Results Achieved

The two deficiencies identified in the violation have been corrected to meet procedural requirements.

A surveillance was conducted July 10 through 14, 1984 on all open MFI tags to examine the implementation and effectiveness of Nuclear Test Instruction (NTI) 61-1402, "Control of Mechanical Foreign Items". The surveillance was performed by the Operational Quality Section with assistance from the Nuclear Test Section. The surveillance encompassed 541 items tagged as MFI's and included MFI Log accuracy, MFI tag completeness and proper installation of the MFI tags. Results of the surveillance identified the need for increased controls on the MFI tag process as 100 deficiencies were noted and documented on Corrective Action Request (CAR) 84-60. In addition, the surveillance team identified the use of a MFI Log sheet that had been superseded by a Program Revision Notice to NTI 61-1402. This was documented on Action Request (AR) PO 142-61.

2. Corrective Action Taken to Avoid Recurrence

With the issuance of the Test Program Manual on July 30, 1984, NTI 61-1402 has been superseded by Test Procedure Instruction (TPI)-18, "Temporary Alterations". The TPI-18 provides more clarification and tighter controls on the MFI process than did the previous NTI 61-1402. The problems identified in CAR 84-60 and AR PO 142-61 have been addressed in TPI-18. Responses to both CAR 84-60 and AR PO 142-61 have been accepted and implementation of corrective action is in progress.

B. Response (continued)

All MFI's are now being processed in accordance with TPI-18. Training of personnel to the requirements of TPI-18 has been conducted. Make-up training for those individuals absent from initial training is in progress.

3. Date of Full Compliance

With the issuance of and training to TPI-18 and correction of the deficiencies identified in the violation, full compliance has been achieved. The deficiencies identified in CAR 84-60 and AR PO 142-61 will be verified in accordance with PNPP procedural requirements governing these documents.