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THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

September 12, 1984

Mr. James G. Keppler
Regional Administrator, Region III
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Re: Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Fuel Pool Gates
Preoperational Test
Requirements [RDC 111 (84)]

Dear Mr. Keppler:

This letter serves as an interim report pursuant to 10CFR50.55(e) on the potential significant deficiency regarding Fuel Pool Gates preoperational test requirements not addressed by test specifications. Mr. J. McCormick-Barger of your office was notified on August 13, 1984, by Mr. B. D. Walrath of The Cleveland Electric Illuminating Company (CEI) that this problem was being evaluated per our Deviation Analysis Report 194.

This report contains a description of the deficiency, the corrective action being pursued, and the planned date for our next report.

Description of Deficiency

No Gilbert/Commonwealth Inc. (G/C Inc.) test specification requirement was written to address acceptance criteria for inspections and tests for the Fuel Pool Gates (sectionalizing devices). Final Safety Analysis Report Table 1.8-1 references Regulatory Guide 1.68, Revision 2-1978, "Initial Test Programs for Water Cooled Nuclear Power Plants." Appendix A, Section M of this Regulatory Guide requires operability and leak tests of sectionalizing devices in the refueling canal and fuel storage pool.

Corrective Action

Project Organization Observation Action Request PO84-65 was issued to track resolution of this problem. A review is being conducted of Final Safety

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Analysis Report and Safety Evaluation Report commitments to assure all applicable criteria are addressed by G/C Inc. test specifications. Completion of the Test Commitment Review is anticipated by September 28, 1984. Our evaluation of the results of this review will be completed by October 31, 1984, and we will then submit the next report on this subject.

Please call if there are any additional questions.

Sincerely,



Murray R. Edelman
Vice President
Nuclear Group

MRE:nb

DW165/E/2

cc: Mr. J. A. Grobe
USNRC, Site Office

Director
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