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September 26, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

Before the Atomic Safety and Licensing Board ~~94-28~~ A11:09

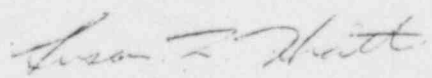
In the Matter of )  
 )  
CLEVELAND ELECTRIC ILLUMINATING )  
COMPANY, Et Al. )  
 )  
(Perry Nuclear Power Plant, )  
Units 1 and 2) )

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
Docket Nos. 50-440 /oc  
50-441 /oc  
(Operating License)

OCRE SUPPLEMENTAL FILING ON ISSUE #6

By this filing Intervenor Ohio Citizens for Responsible Energy ("OCRE") is informing the Board of a recent NRC Inspection Report which is relevant to Issue #6, concerning automation of the Perry standby liquid control system, currently before the Board. The inspection report, of which the cover letter, notice of violation, and pertinent pages are attached, details Applicants' deficiencies in the control of the design of the SLCS. Despite an independent design review of SLCS drawings, deficiencies were discovered by the NRC inspectors. It is thus fair to say that, contrary to Applicants' assertions in its September 7 filing, the design of the SLCS at least as late as June 1984 was indeterminate, as a breakdown in design control had occurred.

Respectfully submitted,



Susan L. Hiatt  
OCRE Representative  
8275 Munson Rd.  
Mentor, OH 44060  
(216) 255-3158

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CERTIFICATE OF SERVICE

'84 SEP 28 A11:10

This is to certify that copies of the foregoing were served by deposit in the U.S. Mail, first class, postage prepaid, this 26<sup>th</sup> day of September, 1984 to those on the VI service list below. BRANCH

Susan L. Hiatt  
Susan L. Hiatt

\* - Special Delivery

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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

AUG 14 1984

8/14/84

Docket No. 50-440  
Docket No. 50-441

The Cleveland Electric Illuminating  
Company

ATTN: Mr. Murray R. Edelman  
Vice President  
Nuclear Group

Post Office Box 5000  
Cleveland, OH 44101

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Gentlemen:

This refers to the routine safety inspection conducted by Messrs. K. R. Naidu, Z. Falevits, A. Gautam, K. Tani, and E. Christnot of this office on April 9-12 and June 4-7, 1984, of activities at Perry Nuclear Power Plant, Units 1 and 2, authorized by NRC Construction Permits No. CPPR-148 and No. CPPR-149 and to the discussion of our findings with Mr. C. Schuster and others of your staff at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel:

During this inspection, certain of your activities appeared to be in non-compliance with NRC requirements, as specified in the enclosed Appendix. A written response is required.

We are concerned that your inspection reports contain various discrepancies such as erroneous dates of review and other inaccurate information. We point out that these are permanent records and as such should not contain significant discrepancies in information and dates. As part of your corrective action regarding the noncompliance identified, we expect you to audit your records to ascertain whether your inspection reports contain adequate information regarding the identification of the item inspected, the results of the inspection, and the date and identification of the initial reviewer.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure(s) will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). If we do not hear from you in this regard within the specified periods noted above, a copy of this letter, the enclosure(s), and your response to this letter will be placed in the Public Document Room.

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The responses directed by this letter (and the accompanying Notice) are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

*R. L. Spurr*  
W. S. Little, Chief  
Engineering Branch

Enclosures:

- 1. Appendix, Notice of Violation
- 2. Inspection Reports  
No. 50-440/84-07(DRS);  
No. 50-441/84-07(DRS)

cc w/encls:

- J. Waldron, Plant Manager
- L. Beck, General Supervisor  
Licensing and Fuels Management
- DMB/Document Control Desk (RIDS)
- Resident Inspector, RIII
- Harold W. Kohn, Ohio EPA
- Terry J. Lodge, Esq.
- James W. Harris, State of Ohio
- Robert H. Quillin, Ohio  
Department of Health

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*Roll*  
W. L.  
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Appendix

NOTICE OF VIOLATION

The Cleveland Electric Illuminating  
Company (CEI)

Docket No. 50-440  
Docket No. 50-441

As a result of the inspection conducted on April 9-12 and June 4-7, 1984, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion X, as implemented by CEI Corporate Nuclear Quality Assurance Program Manual, Section 1000, Revision 3, requires that a program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures and drawings for accomplishing the activity. The following examples were contrary to the above:
  - a. Inspection Reports documenting inspections performed on rework done on the Power Generation Control Console are in some instances not clear and do not specify what was inspected and what was acceptable. Examples include inspection reports on FDI-WNBE and Engineering Changes Notices 245B.
  - b. Inspection Reports verifying corrective action taken on LKC Nonconformance Report 2375 contained discrepancies such as the date of review being a day earlier than the date of inspection and the date of calibration of crimping tools used to crimp the termination lugs.
  - c. Inspection Reports verifying corrective action on LKC Nonconformance Reports 2568 and 2569 contained misleading CEI "Hold" point stamps which were signed and dated several days after the actual inspection was performed. Such a practice renders it difficult to readily verify whether the hold point was honored.
  - d. General Electric Product Quality Certificates (PQC) certifying the compliance of Namco Limit Switches intended for mounting on the Control Valves for the steam turbine, were accepted during receipt inspection even though the serial numbers of the limit switches were not furnished on the PQC to establish traceability.

This is a Severity Level V violation (Supplement II).

2. 10 CFR 50, Appendix B, Criterion III, as implemented by CEI Corporate Nuclear Quality Assurance Program Manual, Section 0300, requires that, CEI perform a design coordination function consisting of selected reviews and design control monitoring programs verifying that these procedures

shall assure that design activities are conducted in a planned and systematic manner; that the Perry Safety Analysis Report requirements have been appropriately addressed in design documents; and that design requirements can be controlled and inspected and/or tested to specified acceptance criteria.

Contrary to the above, CEI failed to assure that Gilbert Associates, Inc. (GAI) adequately reviewed and verified that safety related schematic and wiring diagrams relating to Standby Liquid Control, Residual Heat Removal and Process Radiation Systems were correct in that numerous design errors and inconsistencies were identified.

This is a Severity Level IV violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

AUG 14 1984

Dated \_\_\_\_\_

*R. L. Spessard*

W. S. Little, Chief  
Engineering Branch *for*

- f. The inspector reviewed the standby liquid control systems elementary diagram Drawing B-208-030 Sh. 2, Rev. K. The following discrepancies were identified:
- (1) Status lights (DS17) circuit in MCB for "1C41-C001B or F001B overload trip or loss of power" indicated actuating devices as 74 N.C. contact relays from starters of valves. Review of the drawing showing coils for initiating devices indicated that the relays are designated as 27 on S/D B-208-030, Sh. 4 & 5, rather than 74.
  - (2) Status lights (DS14) circuits in MCB for "SLCS injection loop "A" manual valve position closed or system manually out of service" contained actuating contact from injection valve 1C41-F036. P&I diagram D-302-691 Rev. c indicated that valve 1C41-F036 is located in the common header line inside the drywell and therefore, is common to loop A & B. Loop "B" circuit did not contain an interlock from valve 1C41-F036, and therefore, status lights for loop B will not come on as required when valve is closed. Also, LS3 contact from the limit switch on valve 1C41-F036 was shown in loop A circuit as N.O. contact when per development it should have been shown as a N.C. contact.
  - (3) Circuit showing switches S1A & S1B contact 1-2 as N.C. contacts, should be shown as N.O. contacts.
  - (4) Limit switch development for valves 1C41-F031 Div. I & Div. II does not correlate with development shown on connection diagram D-209-030 Sh. e, Rev. F.
  - (5) The licensee could not locate the connection diagram for valve 1C41-F036 in the existing design drawings. No reference was found to any document showing the connections to limit switches of the valve. The licensee indicated that an ECN 21080-33-3436 dated June 1, 1984, had been written to show the connections, however, the ECN was not referenced on any of the design drawings, apparently indicating that it does not exist.
  - (6) Drawing B-208-030, Sheet 3, Rev. k did not indicate the 120VAC distribution panel number, feeding Division 1 power to 1C41-K600A instrument loop.
  - (7) While reviewing the design drawings at the GAI engineering office, the inspector identified instances where drawings were incorrectly filed, superseded drawings were still filed in the main controlled set and were not marked superseded. One drawing was issued in January 1984 but not filed till June 1984. These drawings are the design reference drawings used by design and field engineers. At the NRC inspector's request, the licensee performed an audit on the control of drawings in the electrical

area. The audit confirmed the inspectors' concern and the licensee subsequently initiated Action Request (AR) 0043 dated June 6, 1984 to implement steps to assure appropriate maintenance of current design drawings.

The inspectors discussed the above findings with the licensee's staff. The licensee informed the inspectors that GDS Associates, Inc., an independent design reviewer, had been contracted by the licensee to review all safety related design drawings relating to G.E. and GAI. GDS Associates had completed their review and had only identified Items 8.f.(1) and 8.f.(6) above prior to the NRC inspection.

The licensee was informed that findings outlined in paragraph 8.b.(1),(2), (3), (4), (5); 8.d.(3), (4) & (5); 8.f.(2), (3), (4) & (5) indicated a failure to establish adequate design control measures to prevent numerous discrepancies among design documents. This is considered an apparent example of noncompliance contrary to the requirements of 10 CFR 50, Appendix B, Criterion III (440/84-07-03(DRS)).

#### 9. Physical Separation of Class 1E Cable

The inspector reviewed Class 1E cable installation for conformance to separation requirements outlined in IEEE 384-1974, Reg. Guide 1.75, Perry 1 FSAR Page 8.1-82, Spec. SP-33-4549-00 2/11/77 and L. K. Comstock raceway and cable installation procedures.

The inspector identified five apparent cases of lack of raceway separations during walkdowns in essential areas of the plant. Each case was subsequently justified through documents showing barriers to be installed at a later date. See Table 1 for details. No apparent deficiencies were found.

Class 1E and balance of plant cables were reviewed for installations in common enclosures. It was observed that in the PGCC room, where adjacent General Electric Cabinets had 1E and non-1E circuits, wiring was touching the separating barriers. Paragraph 8.3.1.4.1.6(a) of the FSAR requires 1" between wiring and barriers - on both sides of barriers.

The licensee reported that an engineering analysis shall be performed to resolve this discrepancy. Pending review and resolution of this matter this item remains open. (440/84-07-04(DRS))