



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

October 31, 1984

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
Fuel Pool Gates
Preoperational Test
Requirements [RDC 111 (84)]

Dear Mr. Keppler:

This letter serves as our second 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 that this problem was being evaluated.

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

Description of Deficiency

The Gilbert/Commonwealth Inc. (G/C Inc.) test specification did not include a requirement to address acceptance criteria for inspections and tests for the Fuel Pool Gates (sectionalizing devices). The Perry Nuclear Power Plant's (PNPP) 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.

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Corrective Action

Project Organization Observation Action Request P084-65 was issued to track resolution of this problem. In response, a test commitment review has been completed of one-hundred sixty (160) G/C Inc. PNPP test specifications. The documents which were reviewed to ensure address of test commitments included the PNPP Final Safety Analysis Report and the PNPP Safety Evaluation Report and Supplements.

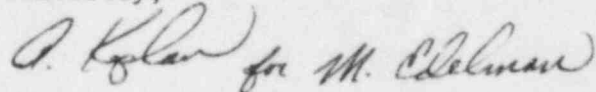
The results of the test commitment review indicated that a total of eleven (11) test specifications were identified as requiring revisions to fully reflect the applicable test commitments. G/C Inc. is developing test specification addenda to correct these deficiencies. This action is expected to be completed by November 21, 1984.

Also, in response to Action Request P084-65, G/C Inc. is conducting a technical review to ensure the test specifications are in conformance with the latest design documents and applicable regulatory requirements.

Completion of the second review identified above is expected by January 31, 1985, at which time we will submit our final report on this subject.

Please call if there are any additional questions.

Sincerely,



Murray R. Edelman
Vice President
Nuclear Group

MRE:nb

DW165/S/2

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

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