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MURRAY R. EDELMAN  
VICE PRESIDENT  
NUCLEAR

February 28, 1985

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 final report pursuant to 10CFR50.55(e) concerning inclusion of preoperational testing requirements in test specifications initiated by Gilbert/Commonwealth Inc. for the Perry Nuclear Power Plant (PNPP). 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.

Description of Deficiency

The Gilbert/Commonwealth Inc. (G/C Inc.) test specifications did not include all testing requirements. The condition initially reported pertained to one test specification, however, the scope of the reviews conducted and corrective actions taken included all G/C Inc. test specifications. The cause of this condition was a policy established early in the project which limited updates of the test specifications to those initiated by CEI. At the time the reported condition was identified, meetings were already being held between G/C Inc. and CEI Systems Engineering Response Team (SERT) to revise the policy and bring the test specifications up to date.

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Analysis of Safety Implication

Failure to specify all required test requirements could result in the condition where the safety-related function of equipment would not be verified during the test program. It should be noted that failure to specify a requirement in the test specification does not necessarily result in a preoperational test without the requirement. Assurance is provided by the administrative controls of the Nuclear Test Program (TPI-7) which require that the Final Safety Analysis Report be utilized in conjunction with the G/C Inc. test specification as sources of preoperational test requirements.

Corrective Action

As a result of the evaluation of DAR 194, CEI issued Project Observation Action Request P0142 84-65 to assure that G/C Inc. test specifications contained the necessary test requirement. As previously reported, measures taken in response to that Action Request included a review of all G/C Inc. test specifications and revision to those found to be incomplete.

Measures taken to prevent recurrence of this condition included both programmatic and logistical changes to the processing of G/C Inc. test specifications. The specific changes were:

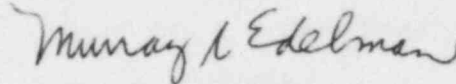
- ° The responsibility for quality assurance review of G/C Inc. test specifications and revisions was transferred from G/C Inc.'s Quality Assurance Department, located in their corporate offices, to the CEI Operational Quality Section of the Nuclear Quality Assurance Department; thereby allowing the review and monitoring of the process to be performed by the quality organization most familiar with the test program requirements.
- ° The responsibility for test specification design review was also transferred from the G/C Inc. corporate offices to engineering personnel assigned to the System Engineering Response Team at the PNPP site. This enables the review to be performed by the engineers most familiar with the test program requirements.
- ° The G/C Inc. Test Specifications Development Group was relocated to the PNPP site and now reports to the Administrative Element of the CEI Nuclear Test Section. This change provides direct CEI overview of the activity.
- ° The G/C Inc. interface procedure has been revised to reflect the change in policy.

February 28, 1985

All of these changes have been implemented and any revisions to the preoperational test procedures are being made as required by the PNPP Test Program Manual.

Please call if there are any questions.

Sincerely,



Murray R. Edelman  
Vice President  
Nuclear Group

MRE:mw

cc: Mr. J. A. Grobe  
NRC Site Office

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