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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

January 31, 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 report is being transmitted pursuant to 10CFR50.55(e) and concerns the lack of test specification requirements for preoperational testing of the Fuel Pool Gates as required in Regulatory Guide 1.68, Revision 2, 1978. 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 by Deviation Analysis Report No. 194. The results of the evaluation are provided as follows:

The safety significance of the lack of specifications for the operability and leak testing of the sectionalizing device (Fuel Pool Gates) in the refueling canal and fuel storage pool has been evaluated and determined to be not reportable per the criteria delineated in 10CFR50.55(e).

If the fuel pool gate seals had not been tested and we assume that during normal operation the installed gates leaked at an unacceptable rate, the flow would be from one spent fuel pool to the transfer pool or to the cask pit area. Under no conditions will the leakage result in the uncovering of spent fuel. In addition, level instrumentation would alarm a low level condition and indicate the need to provide makeup water. Therefore, the omission of the test specification requirement to confirm the leakage rates would not lead to a significant safety hazard.

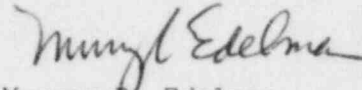
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Although no safety significance was determined for the aforementioned deficiency, the technical review of the test specifications is in process. Additional time will be required to complete the study. These efforts are anticipated to result in the issuance of a final report by February 28, 1985.

Please call if there are any questions.

Sincerely,



Murray R. Edelman
Vice President
Nuclear Group

MRE/jml

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

Mr. D. E. Keating
USNRC, Site Office

Director
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