



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

February 6, 1985
PY-CEI/NRR-0177 L

Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Regulatory Guide
Conformance Clarification

Dear Mr. Youngblood:

As part of our ongoing FSAR Verification Program, we are reviewing the information referenced in FSAR Table 1.8-1, which describes CEI's degree of conformance to each of the listed regulatory guides. Our FSAR verification process will insure that discussions in applicable FSAR text sections appropriately address implementation of applicable regulatory guides, including design related regulatory guides, to insure consistency with Table 1.8-1. If any changes to FSAR Table 1.8-1 are required as a result of our review, the changes will be identified, and incorporated in future amendments. The entire FSAR Verification Program is scheduled for completion by May, 1, 1985. Amendments reflecting changes resulting from the FSAR Verification Program including the regulatory guide review will be submitted on a monthly basis.

In the near term, we are conducting an additional review of those regulatory guides listed in our FSAR Table 1.8-1 that are related to preoperational testing and operational phase activities. This will include, where appropriate, the compilation of alternative approaches used by CEI in fulfilling the recommended guidelines listed in FSAR Table 1.8-1. The regulatory guides being addressed are those related to preoperational testing, operations, operational quality assurance, surveillance and maintenance activities. If the results of this review indicate that additional exceptions or clarifications are in order, it is our intention to provide that information to you by letter no later than the end of March. In addition it is our intention to update our conformance to the regulatory guides related to preoperational testing and operational phase activities in the future as changes, exceptions or alternate methods are required.

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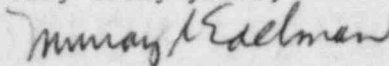
Mr. B. J. Youngblood

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Should there be any changes in the schedule or scope of our review, we will be sure to notify the staff promptly. Please feel free to contact me if you have any questions concerning this matter.

Very truly yours,



Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

Attachment

cc: Jay Silberg, Esq.
John Stefano (2)
J. Grobe