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THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 - CLEVELAND, OHIO 44101 - TELEPHONE (216) 622-9800 - ILLUMINATING BLDG. - 55 PUBLIC SQUARE

Serving The Best Location in the Nation

April 2, 1985

MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

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
Hilti Drop-in Anchor
Installation Requirements
[RDC 118(84)]

Dear Mr. Keppler:

Attached you will find a replacement for our letter dated March 29, 1985, on the above referenced subject. It has come to my attention that the last six lines of typing on page 2 were inadvertently omitted at the time of final typing.

Please accept my apology for any inconvenience this may have caused.

Sincerely,

Murray R. Edelman
Vice President
Nuclear Group

MRE:pab

cc: Mr. J. A. Grobe
USNRC Site Office, SBB50

U.S. Nuclear Regulatory Commission
c/o Document Management Branch
Washington, D.C. 20555

Mr. D. E. Keating
USNRC Site Office, SBB50

Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Mr. James G. Keppler
Regional Administrator, Region III
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U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

RE: Perry Nuclear Power
Plant Docket Nos.
50-440; 50-441
Hilti Drop-in Anchor
Installation Require-
ments [RDC 118(84)]

Dear Mr. Keppler:

This letter serves as the final report pursuant to 10CFR50.55(e) concerning violation of specification requirements during installation of Hilti Drop-in Anchors on the Fire Protection System Supports. Initial notification of our evaluation of this problem per our Deviation Analysis Report 209 was made to Mr. J. McCormick-Barger of your office on October 22, 1984, by Mr. V. Higaki of The Cleveland Electric Illuminating Company. Our interim report on this subject was filed November 15, 1984.

This report contains a description of the deficiency, the corrective action taken, and an analysis of the safety implication including the method of evaluation. As a result of our evaluation, it has been determined that this condition is not reportable pursuant to 10CFR50.55(e).

Description of Deficiency

Automatic Sprinkler Corporation of America reported, through Nonconformance Report ASC-048, that they had violated their QA Procedure F-12a, by inspecting a lesser number of Hilti Drop-In Anchors (HDI's) than required. A subsequent inspection to the requirements set forth in Nonconformance Report ASC-048 revealed that 35 of 54 bolts were not fully set into the concrete (flush) and/or internal plugs were not fully set into the HDI sleeves.

Corrective Action Taken

To assure both the acceptability of installed ASCOA HDI's and the quality of future ASCOA HDI installation, the following actions have been taken:

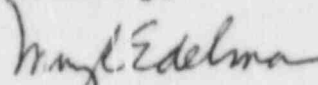
- . ASCOA Nonconformance Report ASC-048 was issued to document that the contractor did not inspect the required number of HDI's. Per Engineering direction, the contractor initiated a reinspection program to bring the number of inspections performed into conformance with specification requirements. Nonconformance Report ASC-048 was closed on February 2, 1985.
- . Nonconformance Report CQC-3538 was issued to document installed HDI conditions. In response, the contractor provided immediate documented training in the correct installation procedure and inspection of HDI's. A 100% inspection of all currently installed HDI's in safety-related areas of Unit 1 and Common buildings was instituted by ASCOA with full contractor's quality control coverage. Reworks were made as necessary. Nonconformance Report CQC-3538 was closed on March 7, 1985.
- . Corrective Action Request (CAR) 84-18 was issued to the contractor for failure to detect installation deficiencies in a timely manner. This CAR required that the contractor evaluate and revise, as necessary, their current procedure for HDI installation and inspection to provide assurance that conditions adverse to quality are promptly identified and corrected. The Construction Quality Section has reviewed and approved ASCOA's revised installation procedure. The new procedure requires 100% in-process inspection of HDI's, indoctrination of all ASCOA craft and QC personnel and control measures for the HDI setting tool. CAR 84-18 was closed on March 1, 1985.

Analysis of Safety Implication

The subject HDI anchors are used to support nonsafety nonseismic portions of the Fire Protection System. Therefore, if the inadequate installation of HDI anchors had gone undetected it would not have affected the safe shutdown of the plant.

Please call if there are any additional questions.

Sincerely,



Murray R. Edelman
Vice President
Nuclear Group

MRE:glb

cc: Mr. J. A. Grobe
USNRC Site Office, SBB50

Mr. D. E. Keating
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