



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

June 6, 1985
PY-CEI/OIE-0057 L

Mr. R. L. Spessard, Director
Division of Reactor Safety, Region III
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Response to Inspection Report
50-440/84-11; 50-441/84-11

Dear Mr. Spessard:

This letter is being transmitted to provide additional information regarding the Open Item No. 50-440/84-11-06, which addressed, in part, the use of Initial Checkout and Run-In (IC & R) tests and test results to satisfy the acceptance criteria for preoperational tests. The following response addresses the extent of this practice and the test program requirements which control IC & R tests and test results for which credit is taken to meet preoperational test procedure acceptance criteria.

Of the 106 preoperational tests, there are 34 which use IC & R tests to satisfy one or more acceptance criteria. The attached list provides details of the extent of this use of IC & R tests in preoperational procedures. We have identified the preoperational test procedure number, the acceptance criteria and the type of IC & R testing used to satisfy the acceptance criteria. The attached list also incorporates some unique procedures, such as response time testing, which were prepared and approved to support specific preoperational tests. In addition, in certain cases vendor data (ie., relief valve certified flow capacity) is used to satisfy preoperational test procedure acceptance criteria.

The Perry Nuclear Power Plant test program requires that copies of the IC & R test data for which credit is taken to meet acceptance criteria, be included in the Release For Test (RFT) package. If the IC & R procedure used to obtain that data is not a generic test, a copy of the procedure is also included in the RFT package. The RFT package is reviewed and approved by the Test Program Review Committee (TPRC). Generic test procedures are already reviewed and approved by the TPRC.

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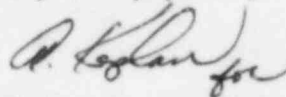
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In addition, the test results package for preoperational tests which is reviewed and approved by the TPRC is required to include copies of IC & R data sheets for which credit is taken to meet acceptance criteria.

We believe these programatic requirements are adequate. However, we are performing an additional review of all preoperational test procedures and results. Any changes resulting from that review will be provided to you through the established procedure distribution methods.

If you have any questions, please feel free to call.

Very truly yours,



Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

Attachments

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

Mr. D. E. Keating
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Mr. R. F. Warnick, Chief
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799 Roosevelt Road
Glen Ellyn, Illinois 60137

**PREOPERATIONAL TESTS WHICH
UTILIZE IC&R TESTING**

Preoperational Test Procedure Number	Step	Description
OG41-P-001	7.16	Pool Gates OG41-E003A, E003B E003C, and 1G41-E001A, E001B, E002A, and E002B are demonstrated to be capable of maintaining a seal against the full hydrostatic load without exceed- ing the allowable leakage rate.
OG51-P-001	7.28	Verifies operation and calibration of Radiation Monitor G51-R150A
	7.29	Verifies operation and calibration of Radiation Monitor G51-R150B
1B21B-P-001	7.6	Instrumentation calibration.
1B33-P-001	7.10	Recirculation Pump Trip (RPT) and Redundant Reactivity Control System are verified as follows: a. The RPT circuit breakers are verified to have a maximum interrupting time of five cycles.

**PREOPERATIONAL TESTS WHICH
UTILIZE IC&R TESTING**

Preoperational Test Procedure Number	Step	Description
1B33-P-001 (Continued)		
		b. Response time is verified in accordance with supplemental instrument calibration procedure.
1B33-P-002	7.1.1	Annunciator checkout
1C11B-P-001	7.5	Annunciator checkout
1C34-P-001	7.1.11	Annunciator checkout
1C41A-P-001	7.15	Temperature controller and switch operation
1C51A-P-001	7.3	Detector and coaxial cable insulation resistance and voltage breakdown test
	7.4	Pneumatic test
	7.5	Detector position, limits and movement verification

**PREOPERATIONAL TESTS WHICH
UTILIZE IC&R TESTING**

Preoperational Test Procedure Number	Step	Description
<hr/> 1C51A-P-001 (Continued)		
	7.9	Service platform rotation alignment
1C51A-P-002	7.3	Detector and coaxial cable insulation resistance and breakdown voltage test
	7.4	Pneumatic test
	7.5	Detector position, limits and movement verification
	7.9	Service platform rotation alignment
1C51B-P-001	7.0	APRMS meet the applicable specifications in the vendor's instruc- tion manual
		Detector and coaxial cable insulation resistance and breakdown voltage test

PREOPERATIONAL TESTS WHICH
UTILIZE IC&R TESTING

Preoperational
Test Procedure
Number

Step

Description

1C51B-F (Continued)

The alarm and actuation set-
points checkout

1C51D-P-001

7.2

Insulation resistance test

7.3

TIP driving torque test

7.4

Setting of core bottom and
top limits

7.7

Verification of purge rate to
each drive mechanism

7.8

Verification of purge pressure
to each index mechanism

1C71-P-001

7.19

Response times verified in
accordance with supplemental
instrument calibration procedure

1C71-P-002

7.6

The RPS Electric Protection
Assemblies (EPA) are
adjusted properly to provide
under voltage, under frequency,
and over voltage protection

**PREOPERATIONAL TESTS WHICH
UTILIZE IC&R TESTING**

Preoperational Test Procedure Number	Step	Description
1D17-P-001	7.1	Verification of power supply voltages
	7.2	Verification of power "fail" operation
	7.3	Proper operation of the pump controls
	7.4	Flow alarm and operational checkout
	7.5	Checkout of moving filter
	7.6	Recorder checkout
	7.7	Count rate response verification
	7.8	Check of calibration of scintillation detectors and log rate-meters
	7.10	Log ratemeter setpoints verification
	7.11	Verification of proper operation of the "Anti-Jam" Circuits in each Ratemeter

PREOPERATIONAL TESTS WHICH
UTILIZE IC&R TESTING

Preoperational Test Procedure Number	Step	Description
1D17-P-001 (Continued)		
	7.13	Duct velocity tests
1D17A-P-001	7.1.2	Trip setpoints and sample flow rates are checked by health physics personnel
1D17F-P-001	7.1.2	Trip setpoints and sample flow rates are checked by health physics personnel
1D17G-P-001	7.1.2	Trip setpoints and sample flow rates are checked by health physics personnel
1D17H-P-001	7.1.2	Trip setpoints and sample flow rates are checked by health physics personnel
1D21-P-001	7.3	Verification using a check source
	7.4	Alarm Trip Test
	7.5	Alarm Trip Test

**PREOPERATIONAL TESTS WHICH
UTILIZE IC&R TESTING**

Preoperational Test Procedure Number	Step	Description
1D21-P-001 (Continued)		
	7.7	Alarm Check
1D23-P-001	7.1.	Instrument calibration, loop and indicator checks, and annunciator verification
1E12-P-001	7.119	Containment Spray Header flow path was verified during the performance of the Residual Heat Removal System Flush
	7.121	Containment Spray Header flow path was verified during the performance of the Residual Heat Removal System Flush
	7.126	Flush completion verification
	7.127	Flush completion verification
	7.131	Flush completion verification
	7.132	Flush completion verification

PREOPERATIONAL TESTS WHICH
UTILIZE IC&R TESTING

Preoperational Test Procedure Number	Step	Description
1E21-P-001	7.1	Minimum Flow Valve time delay verification
	7.14	Annunciator checkout
1E32-P-001	7.12	Instrument calibration
1E51-P-001	7.5	Instrument calibration
1E53-P-001	7.1	Verification that system can be isolated by remote manual action from the control room
	7.2	Remote operation of containment isolation valves from the control room
1M36-P-001	7.7	Off-Gas Building Exhaust System Filter differential pressure tests
1M56-P-001	7.5	Verification that Hydrogen Ignitor Transformers' primary voltages are capable of providing satisfactory hydrogen ignitor secondary voltages

**PREOPERATIONAL TESTS WHICH
UTILIZE IC&R TESTING**

Preoperational Test Procedure Number	Step	Description
<hr/> 1M56-P-001 (Continued)		
	7.6	Verification that Hydrogen Ignitors are capable of providing glow plug temperatures of at least 1700°F
1P53-P-001	7.15	Lower Containment Personnel Air Lock, 1P53-D5002, alarm checkout and interlock demonstration
	7.16	Upper Containment Personnel Air Lock, 1P53-D0001, alarm checkout and interlock demonstration
	7.17	Drywell Personnel Air Lock, 1P53-D0003, alarm checkout and interlock demonstration
1R14-P-001	7.2	Checkout of the AC Bypass Systems for Inverters 1R14-S012 and 1R14-S013
1R42-P-001	7.8	Demonstration that all switch-gear, interlocks and surveillance devices are acceptable for utilization in the Class 1E DC power distribution systems, batteries, and chargers

PREOPERATIONAL TESTS WHICH
UTILIZE IC&R TESTING

Preoperational Test Procedure Number	Step	Description
1R42-P-001 (Continued)		
	7.9	Functional verification of Class 1E protective relay devices
	7.10	Verification (except as demonstrated in Step 1.5) that Class 1E DC systems supply power to Division 1 and 2 loads in such a manner as to preserve their reliability, independence, and redundancy
1R42-P-002	7.5	Demonstration of the annunciators, controls and instrumentation
2R42-P-001	7.8	Demonstration that all switch, gear, interlocks and surveillance devices are acceptable for utilization in the Class 1E DC power distribution systems, batteries, and chargers
	7.9	Functional verification of Class 1E protective relay devices

**PREOPERATIONAL TESTS WHICH
UTILIZE IC&R TESTING**

Preoperational Test Procedure Number	Step	Description
<hr/> 2R42-P-001 (Continued)		
	7.10	Verification (except as demonstrated in Step 1.5) that Class 1E DC systems supply power to Division 1 and 2 loads in such a manner as to preserve their reliability, independence and redundancy
2R42-P-002	7.5	Demonstration of the annunciators, controls and instrumentation