

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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Dalwyn R. Davidsor.

December 1, 1978

Mr. James G. Keppler Director, 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. 50440 and 50441
Final Report on Nonconforming
Safety-Related Embedments and
Structural Steel

Dear Mr. Keppler:

This letter, together with the Gilbert Associates' "Embedment Evaluation Report, Number 2001," dated December 1, 1978, constitutes the final report as required by 10 CFR 50.55(e) on the weld defects in safety-related embedments and the reactor building columns. These defects were brought to the attention of the Perry Project Management on February 3, 1978, by Mr. Naidu of the NRC's Region III Inspection and Enforcement Division. On February 4, 1978, this situation was reported as a significant deficiency and the subject was amplified in the Interim Report dated March 6, 1978. The Interim Report completely described the deficiency and the corrective action taken at that time.

Action taken since the Interim Report:

- A detailed evaluation was made of embedments installed prior to February 4 including:
 - a. An inventory of the type and number of embedments placed prior to that date.
 - b. Complete physical inspection of all embedments fabricated but not installed prior to this date.
 - c. A categorization of the type and number of weld discontinuities established from the above referenced inspection.
 - d. Physical testing of scrapped embedment samples to establish their capebility to withstand design loads.

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2. All required actions necessary to bring the seventeen (17) reactor building columns into full conformance with AWS Dl.1 were taken.

Analysis of the Safety Implications:

- 1. With regard to the seventeen (17) suppression pool columns of the reactor building, all necessary rework, repair, inspection, and testing have been completed. The quality issues associated with the nonconformance report generated on this scructural steel have been resolved and these columns have been cleared for installation.
- 2. The attached "Embedment Evaluation Report" concludes that all embedments will meet their design load requirements.
- 3. The analysis of the safety implications of this weld quality deficiency has brought us to the conclusion that there will be no adverse impact on safety.

Corrective Action:

All of the corrective action measures described in the Interim Report have been implemented. There continues to be a 100% manufacturing surveillance program on all structural steel and embedments fabricated in accordance with Project Specifications SP-666, SP-667, and SP-668. In addition, there is a 100% receipt inspection program on all safety class embedded steel and structural steel fabricated by PBI and its sub-vendor. These measures have assured conformance to AWS D1.1 requirements

Summary:

All embedments fabricated for the Perry Project prior to February 4, 1978, have been evaluated to be completely functional and structurally capable. The reactor building columns have been brought into full accordance with AWS D1.1 requirements. The quality program measures recessary to assure full compliance to specified requirements on safety class structural steel and embedments have been implemented and will continue to be enforced. The deficiency reported to you on February 4, 1978, is no longer a reportable deficiency and with this report is considered by the Cleveland Electric Illuminating Company to be closed out.

Sincerely yours,

Dalwyn R. Davidson

Vice President - Engineering

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cc: John G. Davis, Director (Acting)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555