



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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Serving The Best Location in the Nation
PERRY NUCLEAR POWER PLANT

Al Kaplan

VICE PRESIDENT
NUCLEAR GROUP

September 7, 1988
PY-CEI/NRR-0908 L

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Perry Nuclear Power Plant
Docket No. 50-440, 50-441
NRC Bulletin 88-05
Nonconforming Piping Materials

Gentlemen:

The subject Bulletin required information on materials supplied by two organizations, and requested actions to be taken to assure that these materials comply with ASME Code and design specification requirements, or to assure that these materials are suitable for their intended service. Requested actions included identification of subject material, verification that identified material complied with requirements, and justification for continued operation (JCO) for noncompliances or for actions not completed within 120 days of bulletin receipt. Supplement 1 to NRC Bulletin 88-05 imposed additional requirements on test performance and NRC notification.

NUMARC formed an ad hoc industry committee to address generic aspects of the bulletin in early June, and CEI dedicated a Mechanical Design Senior Project Engineer to that committee. NUMARC then contracted Bechtel to develop and implement a program to determine if real concerns existed with installed material properties, or if these materials were suitable for continued service. One element of this program involved destructive tests on spare parts donated by participating utilities, and CEI donated material for this activity.

In parallel with supporting NUMARC, CEI commenced the records review effort necessary to identify in-plant locations of subject material. It was first established that 2 construction contractors had procured subject material (through subcontractors): General Electric and Pullman Power Products. Review of the GE documents was performed manually under the supervision of a quality control inspector; seven installed fittings were identified and hardness tested in accordance with Equitip test procedures and acceptance criteria presented and justified at a series of NRC/NUMARC meetings between June 27 and July 22, 1988. Test results were all acceptable as summarized in the Attachment. Also provided in the Attachment is one test performed on a flange issued from the warehouse.

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Pullman-supplied material required more time to identify because of the quantity of records involved. Several weeks at Pullman's offices in Williamsport, Pa. were dedicated to retrieving as-built fabrication records and reducing this data to floppy disc for further processing at the Perry site, under the direction of a Quality Assurance engineer. Additional processing of this information was necessary to locate the suspect items on installation as-built drawings as a means of verifying that these items had not been replaced or deleted, or that other suspect items had not been added during the field installation process. Work orders for hardness testing were then staged, based on plant location and system operating status, under the direction of the Lead Engineer, Design Group, Mechanical Design Section.

On August 3, 1988 a total of 27 personnel were dedicated (full and part time) to Bulletin activities, with additional Quality Assurance Manager and Director briefings provided weekly. On August 3, 1988, the NRC issued Supplement 2 to the Bulletin which suspended work on further identification, testing, and JCO preparation. At that time we had identified 48 additional flanges, couplings and plugs for hardness testing, for a total of 56 items. One of these items was later determined to be inaccessible for testing.

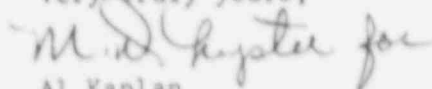
As requested in Supplement 2, CEI has stopped work as follows, pending any further NRC notice:

- o No further testing was performed after August 3, 1988.
- o JCO preparation has been suspended. The NRC Operations Center will not be notified for items determined inaccessible after August 3, 1988.
- o Bulletin pipe fittings will be hardness tested or magnetically tested as appropriate before warehouse issue, pending final Bulletin resolution.

Design record packages for identified material have been completed and will be retained. No material installed or in the warehouse has failed Equitip testing, and therefore no material has been identified as nonconforming. CEI has reported hardness test results to NUMARC as requested.

Please feel free to call if you have further questions.

Very truly yours,



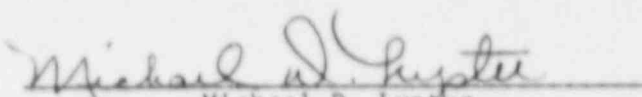
Al Kaplan
Vice President
Nuclear Group

AK:njc


Attachment

cc: T. Colburn
K. Connaughton
USNRC Region III

Michael D. Lyster who, being duly sworn, deposed and said that (1) he is General Manager, Perry Plant Operations Department of The Cleveland Electric Illuminating Company, (2) he is duly authorized to execute and file this report on behalf of The Cleveland Electric Illuminating Company and as duly authorized agent for Duquesne Light Company, Ohio Edison Company, Pennsylvania Power Company and the Toledo Edison Company, and (3) the statements set forth therein are true and correct to the best of his knowledge, information and belief.


Michael D. Lyster

Sworn to and subscribed before me, this 7th day of September,
1988.


JANE E. MOTT
Notary Public, State of Ohio
My Commission Expires February 20, 1990
(Recorded in Lake County)

NRC BULLETIN 88-05 IN-PLANT TEST RESULTS

The following fittings were B0111P hardness tested at Perry Nuclear Power Plant Unit #1.
 All material is SA-105, ASME III, Class 2.

<u>Type</u>	<u>NPS</u>	<u>Heat No.</u>	<u>Brinell #</u>
Flange	36"	H6265	139
Thd Coupling	1/2"	ADM	160
Thd Coupling	1/2"	ADM	161
Thd Coupling	1/2"	ADM	165
Thd Coupling	1/2"	ADM	159
Thd Coupling	1/2"	ADM	167
Thd Coupling	1/2"	ADM	168
SW Flange *	1"	A795	159

* Tested prior to warehouse issue