



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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PERRY NUCLEAR POWER PLANT

Al Kaplan

VICE PRESIDENT
NUCLEAR GROUP

June 9, 1988
PY-CEI/NRR-0859 L

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

Perry Nuclear Power Plant
Docket No. 50-440
IE Bulletin 85-03 Supplement 1

Gentlemen:

This letter provides our response to IE Bulletin 85-03, Supplement 1 dated April 27, 1988. Supplement 1 clarifies the scope of Bulletin 85-03 in two key areas:

It identifies which motor-operated valves (MOV's) are to be included in the MOV operability program. Supplement 1 states that all safety-related valves in selected (high pressure ECCS) systems are to be included. For Perry, that includes all safety-related valves in the high pressure core spray (HPCS-E22) and reactor core isolation cooling (RCIC-E51) systems (hereafter referred to as Bulletin valves).

IE Bulletin 85-03, Supplement 1 also identifies which operating conditions and valve operations are to be addressed. Supplement 1 states that all Bulletin valves must be able to recover from inadvertent mispositioning (i.e. that Bulletin valves must be operable open-to-close and close-to-open under maximum differential pressures expected for both normal and abnormal events included in the existing design basis).

Supplement 1 further prescribes necessary licensee actions to verify Bulletin valve operability. Except for clarifying program scope as described above, the Bulletin supplement relies upon the original bulletin to define these actions.

In response to the clarifications enumerated above, CEI already includes the required valves in our IE Bulletin 85-03 MOV operability program as shown in our final report forwarded by letter PY-CEI/NRR-0835 L, dated March 31, 1988. As stated in the final report, "CEI included all motor-operated valves in high pressure injection systems irrespective of normal valve position or safety actions". This includes all safety related valves in the HPCS & RCIC systems.

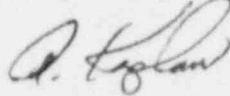
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As described in the report and in our April 20, 1988 letter (PY-CEI/NRR-0841 L), the combination of static and dynamic test results verify the Perry switch setting methodology. The consistent application of this methodology to the Bulletin valves confirms that they are operable both in and out of their normal position. Actions requested by this supplement have therefore been completed.

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

Very truly yours,



Al Kaplan
Vice President
Nuclear Group

AK:cab

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US NRC Region III