



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN  
SR. VICE PRESIDENT  
NUCLEAR

March 20, 1987  
PY-CEI/NRR-0609 L

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

Perry Nuclear Power Plant  
Docket No. 50-441  
Response to Notice of  
Violation 50-441/87001-01

Gentlemen:

This letter acknowledges receipt of the Notice of Violation contained within Inspection Report 50-441/87001 dated February 18, 1987. The report identified areas examined by Mr. D. E. Keating during his inspection conducted from January 12 through 16, 1987 of activities at the Perry Nuclear Power Plant, Unit 2.

Our response to Notice of Violation 50-441/87001-01 is attached. Please feel free to contact me should you have any additional questions.

Very truly yours,

Murray R. Edelman  
Senior Vice President  
Nuclear Group

MRE:njc

Attachment

cc: Paul Leech  
K. A. Connaughton  
USNRC, Region III

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Restatement of the Violation

10 CFR 50, Appendix B, Criterion XIII, as implemented by CEI's Project Maintenance Activity (PMA) program, Section III, Category 44, states "that piping to be blocked or cribbed on dunnage to allow natural drainage. Storage areas to be well draining and free of standing water. Plastic end cap to be installed snug on high end of spool. Low end to remain uncapped."

Contrary to the above, the Parmly Road laydown yard exhibited several areas that were not in conformance with this program, such as, plastic end caps not installed on high end of spool, piping not up on cribbing or dunnage.

This is a Severity Level V Violation (Supplement II).

Corrective Action Taken and Results Achieved

Action Request P000161-0127 was promptly initiated to identify and correct any deficiencies related to the Project Maintenance Activity (PMA) program implementation in the Parmly Road storage area. Maintenance Work Orders were initiated to correct the identified deficiencies outlined in the observation, along with a target completion schedule. The entire Parmly Road storage yard is being worked to meet PMA program storage standards. All piping has been recribbed on dunnage and sloped as to allow for natural drainage. Although all piping spools now have end caps installed on the high end only approximately 40 percent are plastic. All piping spools will have plastic end caps installed on the high end by November 1987.

Corrective Steps to Prevent Recurrence

The PMA Program Section III, Category 44 and its respective Field Storage Maintenance Requirement (FSMR) became effective 01/09/87, three days before the NRC inspector arrived on site, and allowed 30 days to complete the initial FSMR inspection. This has since been revised to require the initial FSMR inspection to be completed within 10 days of the effective date of any new category and respective FSMR.

The corrective actions taken for the Parmly Road storage concerns as stated in the above Notice of Violation shall be maintained pursuant to the PMA program. The piping spools shall be inspected annually to ensure that piping is cribbed on dunnage to allow natural drainage, stored in areas well drained and free of standing water, and capped only on the high end of the spool.

Date of Compliance

All piping is cribbed on dunnage. All piping spools will have plastic end caps on the high end by November 1987. Full compliance will be achieved at this time.