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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

April 11, 1985

Mr. R. F. Warnick, Chief
Reactor Project Branch 1
Division of Reactor Projects
U.S. Nuclear Regulatory Commission, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

RE: Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441

Dear Mr. Warnick:

This letter is to acknowledge receipt of Inspection Report 50-440/85-002; 50-441/85-002 attached to your letter dated March 12, 1985. This report identifies areas examined by Messrs. J. A. Grobe, D. E. Keating and G. F. O'Dwyer during their inspection conducted January 7 through February 11, 1985, at the Perry Nuclear Power Plant.

Attached to this letter is our response to the Notice of Violation dated March 12, 1985. This response is in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations.

Our response has been submitted to you within thirty days of the date of the Notice of Violation as you required. If there are additional questions, please do not hesitate to call.

Very truly yours,

A. Kaplan for

Murray R. Edelman
Vice President
Nuclear Group

MRE:gln
Attachment

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

Mr. D. E. Keating
USNRC Site, SBB50

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

RESPONSE TO ENFORCEMENT ITEM

Below is our response to the Notice of Violation appended to United States Nuclear Regulatory Commission I.E. Report No. 50-440/85-002; 50-441/85-002.

I. Noncompliance

A. Severity Level IV Violation

10 CFR 50, Appendix B, Criterion XI, as implemented through the applicant's Corporate Nuclear Quality Assurance Program, Section 1100, Revision 4, requires that a testing program shall be established to assure that all testing required to demonstrate that structures, systems and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

Certain design requirements and acceptance limits for the safety-related instrument air system and automatic depressurization system are prescribed in the following design documents:

Final Safety Analysis Report (FSAR) Section 6.8.1, Safety Evaluation Report (SER), Supplement No. 2, Section 6.3.1.3, and the Licensing Review Group-II (LRG-II) position paper, Section 8-RSB, adopted by the applicant in a letter to the NRC dated September 16, 1982, document a design requirement that the safety-related instrument air system provide sufficient capacity in air receiver tanks to insure that seven days of system leakage can be accomodated without compromising automatic depressurization system operability.

SER, Supplement No. 2, Section 6.3.1.3, and LRG-II position paper, Section 8-RSB, document a design requirement that the automatic depressurization system provide sufficient capacity in the accumulator for each valve to support two valve actuations at seventy percent of design drywell pressure which is equivalent to five valve actuations at atmospheric drywell pressure.

Contrary to the above, approved test procedures No. 1P57-P-001, "Safety-Related Instrument Air System", and 1B21B-P-001, "ADS/SRV Preoperational Test", did not demonstrate by test the design capacities of the air receiver tanks or valve accumulators. Safety-related instrument air system leakage was not required to be determined and automatic depressurization system valves were only cycled two times at atmospheric drywell pressure.

B. Response

1. Corrective Action Taken and Results Achieved

Concerning the finding that safety-related instrument air leakage testing did not adequately demonstrate design requirements, Test Procedure 1P57-P-001, "Safety-related Instrument Air System" will be revised to address testing to assure the system provides sufficient capacity in air receiver tanks such that seven days of system leakage can be accommodated without compromising automatic depressurization system operability. This revision is anticipated to be completed May 15, 1985. (Item No. 440/85-002-01).

Concerning the finding that Test Procedure 1B21B-P-001 "ADS/SRV Preoperational Test" did not test the design capacities of the valve accumulators, the procedure will be revised to provide demonstration of the accumulator ability to support five valve actuations at atmospheric drywell pressure. This revision is anticipated to be completed by April 30, 1985. (Item No. 440/85-002-04).

This additional testing will assure that the safety-related instrument air and the automatic depressurization systems function as designed.

2. Corrective Action Taken to Avoid Further Noncompliance

A Management Procedure Review Team has been formed to assure maximum confidence in procedure adequacy. The scope of the team assignment will be to fully evaluate concerns, review those procedures for adequacy in which near term testing is about to commence, evaluate recently performed preops comparing procedure reviews with impact on results and help develop any required corrective action.

3. Date When Full Compliance Will Be Achieved

Full compliance is expected to be achieved by May 31, 1985.