



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN
SR VICE PRESIDENT
NUCLEAR

May 1, 1987
PY-CEI/NRR-0641 L

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

Perry Nuclear Power Plant
Docket No. 50-440
Response to Notice of
Violation 50-440/87005-01

Gentlemen:

This letter acknowledges receipt of the Notice of Violation contained within Inspection Report 50-440/87005 dated April 1, 1987. The report identified areas examined by Messrs. R. Hasse and R. Love during their inspection conducted from March 16 through March 20, 1987 of activities at the Perry Nuclear Power Plant, Unit 1.

Our response to Notice of Violation 50-440/87005-01 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: T. Colburn
K. Connaughton
USNRC, Region III

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Restatement of the Violation

10 CFR 50, Appendix B, Criterion V, as implemented by Perry Nuclear Power Plant Operational Quality Assurance Manual requires, in part, that activities affecting quality be accomplished in accordance with approved procedures.

Contrary to the above, form OAP-0507-5, "PEI Validation Form" was not completed for the validation of Revision 1 of the Plant Emergency Instructions as required by Administrative Procedure OAP-0507, "Preparation of Plant Emergency Instructions," Revision 2.

This is a Severity Level V violation (Supplement 1).

Corrective Action Taken and Results Achieved

As noted in the Inspection Report, the planning and control functions for PEI Validation were performed utilizing other documentation methods, therefore, all the information required to be entered onto the Form was readily retrievable from our Records Management Unit. The individuals responsible for the PEI Validation process have transferred this information onto PEI Validation Form's, which are in the process of being forwarded to our Information Control Unit for permanent retention.

Corrective Steps to Prevent Recurrence

Future revisions of the PEI's will be controlled by the requirements of OAP-0507, including the use of the proper form for the PEI Validation planning function. Although the subject of this Violation deals with a relatively minor instance involving lack of use of a specific administrative form, the individuals involved with PEI validation have been reminded of the importance of the need for procedural compliance, including use of procedurally approved forms.

Date of Full Compliance

Full compliance has been achieved.