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Davis



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 8000 - CLEVELAND, OHIO 44101 - TELEPHONE (216) 822-9800 - ILLUMINATING BLDG. - 65 PUBLIC SQUARE

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MURRAY R. EDELMAN  
VICE PRESIDENT  
NUCLEAR

February 12, 1986  
PY-CEI/OIE-0169 L

Mr. James G. Keppler  
Regional Administrator, Region III  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 68137

Dear Mr. Keppler:

This letter documents The Cleveland Electric Illuminating Company's response to the Staff's Confirmatory Action Letters (CALs) (CAL-RIII-86-01, dated January 31, 1986, and CAL-RIII-86-01A, dated February 4, 1986), relating to the seismic event that occurred on January 31, 1986 in the vicinity of the Perry Nuclear Power Plant.

CAL-RIII-86-01 confirmed my prior commitment to Dr. C. J. Papiello of Region III to take the following steps to respond to the earthquake:

1. Conduct a thorough review to determine if the earthquake was within the Design Basis of the plant (FSAR).
2. Identify any damage as a result of this seismic event; determine if that level of damage was as expected.
3. Determine that all equipment, including snubbers, that actuated during this event returned to normal operating conditions/positions; identify any abnormalities.
4. Identify any actions required to complete licensing of the plant related to this event.

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5. Maintain all affected equipment in the "as found" condition. Therefore, take no action such as removing, repairing or replacing equipment which would destroy or cause to be lost, any evidence which would be needed to investigate this event. Routine maintenance may be performed provided that no information related to the event is altered or destroyed.
6. Submit formal report of findings and conclusion to the NRC Region III Office within 30 days.

In CAL-RIII-86-01A, as a result of the inspections by your Augmented Investigation Team (AIT) and the subsequent conversation between the AIT leader, Dr. Paperiello and my staff, you amended and clarified Item 5 of the first CAL to reflect our mutual understanding that CEI would:

1. Maintain all seismic monitoring instrumentation in the "as found" condition. Take no action such as removing, repairing, calibrating or replacing instrumentation which would destroy or cause to be lost, any evidence which would be needed to investigate the event. Maintenance, surveillance, and calibration will be performed only with the prior concurrence of the NRC Region III management.
2. Resume all other activities including work such as, but not limited to, maintenance, training, surveillance, operations and calibrations under the following conditions:
  - A. All off normal conditions identified during these activities will be documented in accordance with CEI's programs and procedures.
  - B. Off normal conditions will be evaluated to determine if they were potentially earthquake related.
  - C. Equipment identified in an off normal condition will be maintained "as found" until evaluated. Equipment determined to be potentially earthquake affected will be maintained in an "as found" condition until released by the NRC.

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- D. The NRC will be notified of all off normal potentially earthquake related condition within 24 hours.

CEI has coordinated closely with the AIT and other members of your staff in implementing steps to satisfy the commitments set forth in the CALs. We have completed a detailed study of the earthquake which demonstrates the satisfactory response of the plant to the event. A copy of our report is being transmitted to you on this date. With the completion of CEI's reviews and of other specific actions taken in accordance with the CALs as discussed below, CEI believes that it has satisfied all the commitments listed in the CALs. We have taken the following steps to satisfy the CALs:

CAL-RIII-86-01

Item 1 Response (Review of Earthquake)

CEI together with its geologic and seismological consultants has performed a thorough review of the earthquake and its impacts on the plant and its design basis. Copies of our report, dated February 12, 1986, are being transmitted to NRC Staff. The review contains a detailed comparison of the recorded earthquake parameters and the plant design basis as described in the FSAR. We have concluded that the earthquake does not call into question the design basis of the plant, as set forth in the Final Safety Analysis Report ("FSAR").

Item 2 Response (No Damage From Earthquake)

Under the procedure discussed below (see CAL-RIII-86-01A Item 2 Response), and as discussed in CEI's Report, CEI has fully documented all abnormal conditions identified following the earthquake. CEI engineers have evaluated the two minor conditions that were caused by the earthquake, as well as those conditions for which no definitive disposition of cause could be made. Our reviews indicate that the earthquake did not cause structural or equipment damage at Perry. We will continue to evaluate any potentially earthquake related conditions identified during completion of remaining surveillance instructions ("SVIs") through February 20, 1986, as discussed below.

Item 3 Response (Good Equipment Response)

As discussed in CEI's report, there were no trips of energized safety-related equipment during the seismic event. CEI reviewed snubbers and other safety-related equipment following the earthquake and found the equipment to be in normal operating conditions/positions. Two non-safety items (the Unit 1

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instrument air compressor and the auxiliary steam boiler) tripped on protective signals as intended by the design and were returned to normal operating condition.

Although the Unit 1 main and auxiliary transformers also tripped during the event, the generator protective relays that initiated the trip were not connected to voltage as noted in CEI's report. After the event, the transformers remained in a deenergized state, consistent with the design of the generator's protection logic. The loads automatically transferred to the startup transformer per the design.

Item 4 Response (Licensing Basis Unaffected)

For the reasons set forth in CEI's report, the earthquake does not call into question the licensing basis of the plant. Accordingly, no actions are required to complete licensing of the plant related to this event.

Item 5 Response (Review of "As-Found" Conditions)

This item was amended and clarified by CAL-RIII-86-01A. Our response to CAL-RIII-86-01A is discussed below.

Item 6 Response (Formal CEI Report)

As noted above, CEI has completed and is submitting to you a formal report dated February 12, 1986, discussing the findings and conclusions of CEI and its geological and seismological consultants regarding the January 31, 1986 earthquake and the satisfactory response of the plant.

CAL-RIII-86-01A

Item 1 Response (Seismic Monitoring Instrumentation)

Following the earthquake, CEI maintained all seismic monitoring instrumentation in the "as-found" condition as specified in the CAL. Maintenance, surveillance and calibration of the instrumentation has been performed only where necessary and with prior concurrence of the NRC Region III management.

Item 2 Response (Evaluation Procedure)

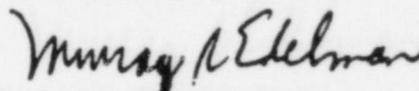
CEI has put into effect a procedure (OM19A: GTI-0003) that satisfies our commitments as noted in this item. The procedure assures: documentation of all off normal conditions; maintenance of structures and equipment in the "as found" condition until evaluated; identification and reporting to NRC of all potentially earthquake affected structures or equipment;

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engineering evaluation of all such structures and equipment;  
and prior approval of NRC before changing any such structures  
or equipment from the "as found" condition.

CEI has therefor satisfied all commitments noted in  
CAL-RIII-86-01, as amended and clarified by CAL-RIII-86-01A.  
We anticipate that all required plant systems for fuel load  
will be operational by February 20, 1986. Prior to achieving  
fuel load status, the remaining surveillance instructions will  
be completed and current. SVIs for systems already declared  
operational will also be current. Through these activities,  
any potentially earthquake related conditions will have been  
identified, evaluated, and reported. Consequently, by February  
20, 1986, we intend to return to our normal plant operating  
procedures.

Very truly yours,



Murray R. Edelman  
Vice President  
Nuclear Group

MRE:L

cc: Jay Silberg, Esquire  
John Stefano  
J. Grobe  
D. Eisenhut  
R. Bernero  
W. Butler  
G. Lainas  
J. Keppler  
C. Norelius  
C. Paperiello  
R. Knop



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NUCLEAR

February 12, 1986  
PY-CEI/NRR-0437 L

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Perry Nuclear Power Plant  
Docket Nos. 50-440; 50-441  
Seismic Event Evaluation Report

Dear Mr. Denton:

My letter to you dated February 5, 1986, committed to provide a report on our response and activities related to the earthquake which occurred in the vicinity of the Perry Nuclear Power Plant. Enclosed is the Cleveland Electric Illuminating Company (CEI) report titled "January 31, 1986 Earthquake-Seismic Event Evaluation" for the Perry Nuclear Power Plant. This document has been prepared by CEI and our consultants following a thorough and detailed assessment of the plant response to the January 31, 1986 earthquake.

This report demonstrates the appropriateness of the seismic design for the Perry Nuclear Power Plant. Although this recent event provides an additional "data point" for historical seismic event activity, it will not alter any of the design criteria or licensing basis.

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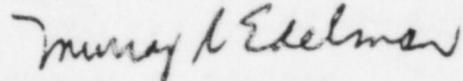
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We believe that this report provides the information necessary to support the staff's review and we are available to meet with your staff as necessary. Should you or your staff have any questions please feel free to call.

Very truly yours,



Murray R. Edelman  
Vice President  
Nuclear Group

MRE:L

cc: Jay Silberg, Esquire  
John Stefano  
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