



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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Dalwyn R. Davidson

VICE PRESIDENT

SYSTEM ENGINEERING AND CONSTRUCTION

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September 28, 1979

Mr. Gaston Fiorelli
Reactor Construction and
Engineering Support Branch
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Fiorelli:

This letter is to acknowledge receipt of your Inspection Report Number 50-440/79-06; 50-441/79-06 attached to your letter dated August 28, 1979, which I received on August 31, 1979. This report identifies areas examined by Mr. K. D. Ward during the inspection conducted at Perry Nuclear Power Plant from August 8 - 10, 1979.

Attached to this letter is our response to the one (1) Item of Noncompliance described in Appendix A, Notice of Violation, of the above referenced I. E. Report. 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.

Please call if I may be of further assistance.

Very truly yours,

D. R. Davidson
Vice President
System Engineering and Construction

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RESPONSE TO ENFORCEMENT ITEM

Below is the response to the noncompliance identified in Appendix A, Notice of Violation, enclosed with United States Regulatory Commission I. E. Report Number 50-440/79-06; 50-441/79-06.

I. A. Infraction

10CFR50, Appendix B, Criteria IX, states in part that, "Measures shall be established to assure that special processes including welding...and nondestructive testing...are controlled and accomplished...with...applicable specifications...and other special requirements..."

The Perry Nuclear Power Plant, Units 1 and 2, PSAR Section 17.1.9.2, stated in part that "CEI requires contractors to establish and document measures that will assure that special processes will be accomplished...in accordance with the applicable codes..."

Contrary to the above, Liquid Penetrant Examination (PT) Procedure 465-NC-N003, Rev. 3, August 15, 1977, specifies examinations can be performed down to 40°F. However, a qualification procedure has not been established qualifying the process down to a temperature of 40°F as required by ASME Section V. Liquid Penetrant Inspection Procedure 948-N-004, Rev. C, May 25, 1979, (AWS D1.1-75) is also being used specifying a temperature down to 40°F, without being qualified as required by ASTM E165-75.

B. Response

1. At the present time, any liquid penetrant examinations being conducted by Newport News Industrial Corporation of Ohio are being performed at temperatures above 60°F.
2. Liquid Penetrant Examination Procedure 465-NC-N003, Rev. 3, dated August 15, 1977, will be qualified to a temperature of 40°F by October 15, 1979, in accordance with the requirements of ASME Section V. Additionally, Liquid Penetrant Inspection Procedure 948-N-004, Rev. C, dated May 25, 1979, will be qualified to a temperature of 40°F by October 15, 1979, in accordance with the requirements of ASTM E165-75.
3. Full compliance will be achieved by October 15, 1979.