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Dalwyn R. Davidson
VICE PRESIDENT
SYSTEM ENGINEERING AND CONSTRUCTION

June 15, 1981

Mr. R. F. Heishman, Acting Director
Division of Resident and Project Inspection
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
Response to I. E. Report

Dear Mr. Heishman:

This letter is to acknowledge receipt of Inspection Report Number 50-440/81-08; 50-441/81-08, attached to your letter dated May 21, 1981, which I received on May 26, 1981. This report identifies areas examined by Mr. J. Hughes during his inspection conducted April 1 through 30, 1981.

Attached to this letter is our response to the one (1) Severity Level V Violation described in Appendix A, Notice of Violation, dated May 21, 1981. 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 twenty-five days of the date of the Notice of Violation as you required, and the information submitted is true and correct to the best of my knowledge, information and belief. If there are additional questions, please do not hesitate to call.

Very truly yours,

D. R. Davidson
Vice President
Systems Engineering and Construction

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cc: Mr. J. Hughes, NRC - Site

U. S. Nuclear Regulatory Commission
c/o Document Management Branch
Washington, D. C. 20555

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RESPONSE TO ENFORCEMENT ITEMS

Below is our response to Appendix A, Notice of Violation, of United States Nuclear Regulatory Commission I. E. Report 50-440/81-08; 50-441/81-08.

I. Noncompliance 440/81-08-02

A. Severity Level V Violation

10CFR50, Appendix B, Criterion V (Procedures), states in part that, "Activities affecting quality shall be prescribed by documented instructions...and shall be accomplished in accordance with these procedures..."

CEI Corporate QA Program, Section 0500 requires that procedures and instructions of consultants, agents, contractors and vendors for those activities affecting quality shall be delineated by instructions and procedures.

Contrary to the above, General Electric (GE) failed to follow the above procedure by allowing the reactor vessel internals to be installed in inclement weather conditions (rain). GE Specification No. 22A4671, Revision 1, states in part, "cover of vessel shall be provided over the top of vessel, this cover shall not be opened or removed for installation of internal parts unless weather forecasts indicate reasonable assurance that rain or storms are not imminent and that there will be time to replace the cover."

B. Response

1. General Electric I&SE immediately initiated Nonconformance Reports GE 38-191 and GE 38-194 to address this violation. The Construction Quality Engineering Unit of Nuclear Quality Assurance Department issued an Action Request the following day for violation of GE Specification No. 22A4671, and Field Deviation Disposition Request (FDDR) KL1-113 was written covering the entrance of rain water into the reactor pressure vessel.

The top of the steam dryer 1B13-D005 was cleaned, and GE/I&SE has committed to do closer inspections of equipment during installation and keep equipment covered. A sample of water was taken from the top of the steam dryer 1B13-D005, analyzed, and the results were sent to General Electric San Jose.

2. After the removal of the reactor pressure vessel head, steam dryer, and steam separator, the components and internals will be inspected and/or cleaned to assure compliance with the cleaning and cleanliness controls procedure.

Response (Cont'd.)

Whenever the vessel is opened to the weather, a cover will be maintained until equipment must pass the flange elevation. Also, prior to cover removal, local weather forecasts will indicate at least four hours of rain free weather. Nuclear Construction supervisory personnel have reviewed the requirement of GE Specification No. 22A4671 and are fully aware of their responsibilities in this area relative to steps to prevent recurrence.

3. Full compliance will be achieved by September, 1981.

ksz