



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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Dalwyn R. Davidson

VICE PRESIDENT
SYSTEM ENGINEERING AND CONSTRUCTION

September 16, 1982

Mr. James R. Miller, Chief
Standardization and Special Project Branch
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Licensing Review Group, LRG-II

Dear Mr. Miller:

By letters dated May 17, 1982, and September 3, 1982, Mr. Dale Holtzscher, Chairman of the LRG-II Working Group provided position papers on additional LRG-II issues. As a member of the LRG-II, and in accordance with the practices developed by NRR and the LRG-II, Cleveland Electric Illuminating Company (CEI) hereby incorporates the information provided in Mr. Holtzscher's letters into the Perry Nuclear Power Plant Operating License application.

Specifically these letters provided information on the following LRG-II issues:

2-ASB	6-CPB	4-MEB
5-ASB	2-CSB	1-RSB, Rev. 1
3-CHEB, Rev. 1	2-HFS, Rev. 1	8-RSB, Rev. 1
2-CPB, Rev. 1	1-ICSB, Rev. 1	9-RSB
3-CPB, Rev. 1	2-ICSB	

Please note that CEI does not endorse the LRG-II position for the 3-HFS issue regarding common reference for reactor vessel level measurement. All vessel level instrumentation at Perry will reference the top of active fuel.

We believe these position papers along with the September 3, 1982 letter summary status provide sufficient documentation for resolution of the remaining LRG-II issues.

Very truly yours,

Dalwyn R. Davidson
Vice President
System Engineering and Construction

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DRD:mb

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