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Dalwyn R. Davidson

VICE PRESIDENT

SYSTEM ENGINEERING AND CONSTRUCTION

April 30, 1982

Mr. C. E. Norelius, Director
Division of Engineering and Technical 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. Norelius:

This letter is to acknowledge receipt of Inspection Report Number 50-440/82-03; 50-441/82-03, attached to your letter dated April 6, 1982. This report identifies areas examined by Messrs. K. D. Ward and E. H. Nightingale during their inspection conducted February 23-26 and March 8-10, 1982.

Attached to this letter is our response to the one Severity Level V Violation described in Appendix A, Notice of Violation, dated March 31, 1982. 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 thirty 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

DRD:pab
Attachment

cc: USNRC - Site

Mr. R. L. Spessard, Director
Division of Resident and Project Inspection
U.S. Nuclear Regulatory Commission, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

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 50-440/82-03; 50-441/82-03:

I. Noncompliance 440/82-03-03

A. Severity Level V Violation

10CFR50, Appendix B, Criterion IX states in part that, "Measures shall be established to assure that special processes, including... nondestructive testing, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements."

The Perry Nuclear Power Plant, Units 1 and 2, PSAR Section 17.1.9.2, states 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..."

The specified code, American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section V 1974 Edition, Summer 1975 Addenda, paragraph T-235.2 requires that the location markers locate the area of interest accurately and ASME Section III, 1974 Edition, Summer 1975 Addenda, paragraph NE-5321 states that incomplete fusion, excessive elongated indications (slag) and cracks are unacceptable.

Contrary to the above, lead location markers were in the area of interest, a repair area was not correctly identified by location markers, and lack of fusion, excessive slag and a crack were found in various welds.

B. Response

Condition 1 - Assembly #OM-61-21X Weld B, area P-S-B was re-radiographed with the location markers placed in the correct locations, outside the area of interest, re-evaluated and found acceptable. No further action required.

Condition 2 - All radiographs of welds associated with NRs # 17-152, 17-777, 17-195, 17-254 and 17-268 has been re-reviewed by CEI NDE Element 100%. This second review consisted of 58 weld joints of which 36 were rejected. Based on this reject level, we are evaluating this problem for reportability pursuant to 10CFR50.55(e).

Because of the high reject rate of those containment welds identified above, the NDE element has committed to, and is in the process of performing a 100% re-review of all welds of Units I and II containments.

RESPONSE TO ENFORCEMENT ITEMS

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To date, 874 films have been re-reviewed representing 5% of the total for both containments.

Projected completion date for this review is August 31, 1982.