



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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Dalwyn R. Davidson
VICE PRESIDENT
SYSTEM ENGINEERING AND CONSTRUCTION

May 6, 1982

DESIGNATED ORIGINAL
Certified By Maria Pearson

Mr. James G. Keppler
Regional Administrator, Region III
Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

On February 18, 1982, I sent a letter to the Nuclear Regulatory Commission, Region III, identifying actions The Cleveland Electric Illuminating Company had initiated as a result of discussions held on February 10, 1982, at the NRC Headquarters in Glen Ellyn, Illinois. These actions have been completed and evaluated by a special subcommittee of the Quality Assurance Advisory Committee and our management. The following actions were taken:

1. An evaluation of the quality performance of each safety-related contractor has been completed.

These evaluations showed that all safety-related contractors have adequate Quality Assurance programs. Areas for improvement have been identified and are being pursued. There has been no loss of control over contractor performance or over related activities of the Project Organization.

2. A program has been established for each safety-related contractor as well as the Project Organization in areas that were identified as needing improvement.

This action will further improve the program and reinforce the training emphasizing the roles and responsibilities of the Project and contractor organizations.

3. A review of the nonconformance system has been completed. This included a review of the adequacy and use of Nonconformance Reports, Field Questions, Field Variance Authorizations, Audit Action Requests, and Corrective Action Requests. Contractor and Project personnel interviews were conducted to determine the level of understanding of the purpose and correct use of each document.

This assessment confirmed that the nonconformance system identifies and corrects nonconforming items. No evidence of any attempt to avoid use of this system was identified. The evaluation resulted in the initiation of improvements both in the program and training.

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4. The documentation and records associated with equipment installed by L. K. Comstock have been analyzed. Areas reviewed included the receipt, installation, and inspection of motor control centers, switchgear, cable tray hangers, and the contractor's welding program.

This effort resulted in identification of areas requiring strengthening. Improvements are being implemented by L. K. Comstock and the Project Organization.

5. The status of safety-related and partially safety-related systems that have been turned over from the contractor to the Nuclear Test Section for testing has been evaluated.

All jurisdictional transfers of equipment were reviewed, the safety classification of equipment was reaffirmed, records and documentation were also reviewed to be sure they were satisfactory. Discrepancies or work remaining to be done were checked against the Master Deficiency List to assure its address and correction.

This evaluation resulted in improvements in the definition and status of systems turned over for test. Actions have also been initiated to clarify and simplify the turnover process.

At post-inspection meetings, concerns were expressed by the NRC relating to the implementation of the quality program in the electrical discipline. These concerns have been documented, evaluated, and appropriately addressed. In addition, the Project Organization has taken actions including the formation of the Construction Audit Group which is now completing an in-depth audit of L. K. Comstock. The results of this audit, coupled with actions previously identified, will serve as the basis for continued improvement of the L. K. Comstock program.

The actions taken since the meeting on February 10, 1982, in Glen Ellyn, to react to the concerns expressed, demonstrate commitment on the part of management at all levels to an active and viable Quality Assurance Program.

The evaluations indicate a program that is effective, but complex in some areas. The improvements planned focus on simplifying the Quality Assurance Program and clearly identifying the roles and accountability of responsible organizations and individuals.

The demonstrated capability of the Project Organization to perform this evaluation while meeting day-to-day responsibilities is evidence of a high level of competence and maturity within the Project Organization.

Mr. James G. Keppler

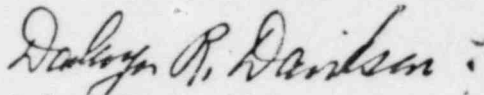
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Detailed information regarding these evaluations is available for your review.

If you have any questions, please call me.

Sincerely,



Dalwyn R. Davidson
Vice President
System Engineering and Construction

DRD/llp

cc: Mr. M. L. Gildner
NRC Site Office

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