



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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*Serving The Best Location in the Nation*

Dalwyn R. Davidson  
VICE PRESIDENT  
SYSTEM ENGINEERING AND CONSTRUCTION

April 16, 1982

Mr. James Keppler  
Director, Region III  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

| PRINCIPAL STAFF |            |      |            |
|-----------------|------------|------|------------|
| DIR             | <i>has</i> | E&IS |            |
| D/D             |            | PAO  |            |
| A/D             |            | ELO  |            |
| OR&PI           |            |      |            |
| DE&TI           |            |      |            |
| DEP&OS          |            | File | <i>has</i> |

Dear Mr. Keppler:

Thank you and your staff for the opportunity to meet with you and discuss the findings and observations from the most recent SALP Evaluation for Perry Plant Units 1 and 2. This frank review and open discussion of the SALP Procedures and your evaluation of our activities for the period of the report (July 1, 1980 - September 30, 1981) was in our view, most helpful.

Consistent with the SALP process, the Cleveland Electric Illuminating Company submits the following comments on the SALP Report:

1. We agree, in general, with the "Summary of Significant SALP Report Findings" contained in Enclosure 1. We appreciate the positive comments contained in this Section and in the body of the SALP Report itself. These comments indicate a recognition on the part of the SALP Board and on the part of NRC management of the aggressive efforts the Cleveland Electric Illuminating Company has taken and will continue to take to build a safe plant.

However, as we discussed, we feel this Section needs some clarification. We understand the concerns expressed in the second paragraph of this Section were focused on the two contractors involved with coating and electrical work respectively. The present language in the Section implies broader implications than those expressed in the discussion and which are not supported by the factual material presented in the main body of the SALP Report.

2. With respect to the ratings contained in Section III of the report:
  - a) We appreciate the Category I rating in two Functional Areas, particularly since we know how difficult they are to achieve.
  - b) We agree with the ratings in all Functional Areas, except that for Functional Area 6, "Electrical Power Supply and Distribution."

Mr. James Keppler

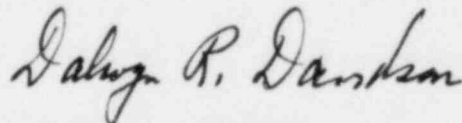
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- c) We do not fully concur with the Category 3 in Functional Area 6, but as a result of the discussions held, we do understand why the rating was applied. The electrical contractor's program and our own program in this area have been modified to address concerns previously identified. We look forward to discussing these actions with you and your staff.

Again let me express my appreciation to you and your staff.

Sincerely,



Dalwyn R. Davidson,  
Vice President-  
System Engineering and Construction

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

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U.S. Nuclear Regulatory Commission  
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