



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

April 15, 1983

Mr. R. L. Spessard, Director
Division of Engineering
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. Spessard:

This letter is to acknowledge receipt of Inspection Report Number 50-440/83-06; 50-441/83-06, attached to your letter dated March 16, 1983. This report identifies areas examined by Messrs. P. A. Barrett, K. R. Naidu and P. R. Pelke during their inspection conducted February 8-11, 1983.

Attached to this letter is our response to the three Violations described in the referenced Notice of Violation, dated March 16, 1983. 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. If there are additional questions, please do not hesitate to call.

Very truly yours,

M. R. Edelman
Vice President
Nuclear Group

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PDR ADOCK 05000440 PDR
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MRE:pab
Attachment

cc: Mr. M. L. Gildner
USNRC, Site

Mr. C. E. Norelius, Director
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U.S. Nuclear Regulatory Commission, Region III
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Glen Ellyn, Illinois 60137

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

APR 18 1983

RESPONSE TO ENFORCEMENT ITEMS

Below is our response to Appendix A, Notice of Violation, of United States Nuclear Regulatory Commission I.E. Report 50-440/83-06; 50-441/83-06.

Noncompliance I. (440/83-06-01; 441/83-06-01)

A. Severity Level IV Violation

10CFR50, Appendix B, Criterion II states, in part, "The quality assurance program shall provide control over activities affecting the quality of the identified structures, systems, and components, to an extent consistent with their importance to safety."

CEI Corporate Nuclear Quality Assurance Program, Section 0200, Revision 4, paragraph 1.1 states in part, "The program provides for accomplishing activities affecting safety under suitably controlled conditions and in accordance with the program elements of procedures, instructions, specifications, and drawings."

Contrary to the above, the L. K. Comstock QA Program failed to provide control over deficiencies identified by an internal LKC documentation task force, in that these deficiencies were addressed in uncontrolled review checklists and internal LKC letters.

B. Response

1. Corrective Actions Taken and Results Achieved

L. K. Comstock has written a QC Inspection Report for each of the concerns identified during the LKC Task Force document review. This will provide for status tracking of each concern until it is fully addressed and closed out.

As identified above, the LKC Task Force generated checklists for each document package as they performed their review to detail their comments. These checklists have been procedurally addressed within the LKC QA program to ensure that each specific item is tracked and resolved prior to turnover.

Along with the contractor's actions, the Cleveland Electric Illuminating Co. (CEI) has developed a Special Project Plan in accordance with the requirements of our "Project Administration Procedures," that defines the actions necessary to resolve the task force issue.

As a part of this program, all of the "task force" concerns have been addressed on Project Organization Surveillance Inspection Reports (SIR's). This duplicates the LKC tracking of these items. The SIR's are assigned to individuals within the Construction Quality Section. This enables CEI to monitor, provide follow-up, and ensure resolution of each item.

2. Corrective Action Taken to Avoid Further Noncompliance

In light of this NRC concern, the PNPP Nuclear Quality Assurance Department Manager re-emphasized to L. K. Comstock by written memorandum that all quality issues shall be processed in strict accordance with the Project approved LKC QA program. On a Project level, this message was additionally directed to all site contractors performing safety-related activities at Perry. In addition, the NQAD Construction Quality Section performed a review of all safety-related contractor's internal correspondence files to insure that quality issues were being processed in strict accordance with their QA programs. This review netted positive results.

In order to provide continuous monitoring of L. K. Comstock, a Project Organization QA representative has been assigned to L. K. Comstock on a full time basis. This individual will monitor all LKC inspection reports and provide a continuing review of documentation packages that are in process to ensure that the Task Force items are being properly addressed.

3. Date When Full Compliance Will Be Achieved

The concerns and individual checklist items noted by the LKC task force have been addressed on QA program documents. Therefore, full compliance has been achieved.

Noncompliance II. (440/83-06-06; 441/83-06-06)

A. Severity Level V Violation

10CFR50, Appendix B, Criterion III, states in part, "The design control measures shall provide for verifying or checking the adequacy of design, such as by the performance of design reviews...performed by individuals or groups other than those who performed the original design...."

CEI Corporate Quality Assurance Program Section 0300 states in part, "CEI performs a design coordination function consisting of selected reviews and design control monitoring program.... These procedures shall assure... "Design activities are conducted in a planned and systematic manner... Perry Safety Analysis Report requirements have been appropriately addressed in design documents...Design requirements can be controlled and inspected and/or tested to specified acceptance criteria."

Contrary to the above, CEI failed to assure that Gilbert Associates Inc. (GAI) adequately reviewed and verified that the requirements of Westinghouse Electric Corporation drawing E-40048 for medium voltage penetrations and electrical specification SP-33 were adequately translated into the isometric drawings 1R-72-3 and 1R-72-4 prepared by Pullman Power Products. Specifically, drawings 1R-72-3 and 1R-72-4 were approved by GAI, without the consumable insert specified on drawing E-40048 and the backing ring specified in paragraph 5:08.1.4C of specification SP-33. Consequently, the medium voltage penetrations were welded in Unit 1 without the benefit of either a consumable insert or a backing ring. Furthermore, there was no assurance that this discrepancy would have been corrected during the installation of medium voltage penetrations in Unit 2.

B. Response

1. Corrective Action Taken and Results Achieved

L. K. Comstock issued Stop Work Notice #11 on the installation of the medium voltage penetrations. The discrepant welding conditions that exist on the Unit 1 medium voltage penetrations have been documented on Nonconformance Report LKC 1769. The nonconformance report has since been dispositioned, accepted, and verified.

2. Corrective Action Taken To Avoid Further Noncompliance

The Construction Quality Section issued Observation Action Request #605 to Gilbert Associates for inadequately reviewing the Pullman Power Products isometric drawings for the medium voltage penetrations. As a result, the Unit 2 penetration drawings will be revised to reflect the specification requirements and GAI personnel have been alerted to assure that drawings are reviewed to the specification governing the work.

To ensure compliance, an owner hold point has been established on the welding of the Unit 2 medium voltage penetrations.

3. Date When Full Compliance Will Be Achieved

Drawing revisions will be completed by May 20, 1983, and full compliance will then be achieved.

Noncompliance III. (440/83-06-03; 441/83-06-03)

A. Severity Level IV Violation

10CFR50, Appendix B, Criterion X states in part, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

CEI Corporate Nuclear Quality Assurance Program, Section 1000, Revision 3, paragraph 1.1 states in part, "A program for inspection shall be established by CEI to ensure that all safety-related components, systems, structures, and activities affecting those items meet the required quality standards."

Contrary to the above, a program for the inspection of in-process fillet weld activities performed by L. K. Comstock Company had not been established or executed to verify conformance with standard AWS-D1.1 1975, Section 6.

B. Response

1. Corrective Action Taken and Results Achieved

The immediate corrective action taken by L. K. Comstock was to issue Stop Work Notice #10 on all welding performed by LKC.

As a result, a program for the in-process fillet weld activities has now been established by the contractor. This was accomplished through a revision to their weld inspection procedure 4.8.18, paragraph 3.7.

To address the procedure deficiency concerning previous in-process inspections, the contractor initiated Nonconformance Report LKC 1788.

2. Corrective Action Taken to Avoid Further Noncompliance

To prevent recurrence, training was conducted to the revised LKC Weld Inspection Procedure. The procedure currently reflects the in-process weld inspection as required by AWS D1.1-1975.

3. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.