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MURRAY R. EDELMAN

VICE PRESIDENT  
NUCLEAR

June 9, 1983

Mr. James G. Keppler  
Regional Administrator, Region III  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
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. Keppler:

This letter is to acknowledge receipt of Inspection Report Number 50-440/83-11; 50-441/83-10, attached to your letter dated May 9, 1983. This report identifies areas examined by Mr. N. Merriweather during his inspection conducted March 28 through April 1, 1983.

Attached to this letter is our response to the one Severity Level IV violation described in Appendix A, Notice of Violation, dated May 10, 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, 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,

M. R. Edelman  
Vice President  
Nuclear Group

MRE:pab

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

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 50-440/83-11; 50-441/83-10:

### I. Noncompliance 440/83-11-01

#### A. Severity Level IV Violation

10CFR50, Appendix B, Criterion V, as implemented by CEI Corporate Nuclear Quality Assurance Program Manual, Section 0500, requires that activities affecting quality be performed in accordance with documented instructions and procedures of a type appropriate to the circumstances.

Contrary to the above, Johnson Controls Incorporated (JCI - the instrumentation contractor) was performing turnover reviews of purchase orders and installation/fabrication packages without a documented procedure. As a result, those deficiencies which were identified during the review were not being documented and controlled in accordance with JCI's approved QA program.

#### B. Response

##### 1. Corrective Action Taken and Results Achieved

The immediate corrective action taken by Johnson Controls Inc. was to suspend all document review processes that were being performed. This was directed by the JCI QA Manager via memo to the Quality Engineer responsible for records turnover. Included in the memo were additional instructions specifying that all "Purchase Order Review Forms" be reviewed for the existence of deficiencies. Upon evaluation, if deficiencies were determined to be nonconforming conditions, they were to be documented in accordance with the existing JCI program.

The five deficiencies that were listed for purchase order number 64491-1 were reviewed and evaluated by JCI Management. As a result of the review it was determined that no nonconforming conditions existed. This review was documented on the "Purchase Order Review Form".

##### 2. Corrective Action Taken To Avoid Further Noncompliances

Johnson Controls procedure QAS-1802-PNPP, "Review and Turnover of Records," has been revised to reflect the present method of document review. Included in the revision is specific reference to the "Transfer Unit Deficiency List". The "Transfer Unit Deficiency List" is a list of all deficiencies identified on purchase orders and installation/fabrication packages. Deficiencies are evaluated for nonconforming conditions. Additionally, the procedure emphasizes the requirement for identification and documentation of nonconforming conditions.

NOTE: Transfer Unit Deficiency List and Purchase Order Review Form are synonymous.

##### 3. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.