



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

August 12, 1983

Mr. W. S. Little, Chief
Engineering Branch 2
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

Dear Mr. Little:

This letter is to acknowledge receipt of Inspection Report Number 50-440/83-19; 50-441/83-18 attached to your letter dated July 15, 1983. This report identifies areas examined by Mr. N. Merriweather of Region II during his inspection conducted June 20-24, 1983, at the Perry Nuclear Power Plant.

Attached to this letter is our response to the one (1) Severity Level IV Violation described in the Notice of Violation dated July 15, 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

MRE:pab
Attachment

cc: Mr. M. L. Gildner
USNRC Site

Mr. R. C. Knop, Chief
Projects Branch 1
Division of Project and Resident Programs
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 the Notice of Violation appended to United States Nuclear Regulatory Commission I.E. Report 50-440/83-19; 50-441/83-18.

I. Noncompliance 440/83-19-01; 441/83-18-01

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) removed and reinstalled safety-related instrument panel no. 1H22-P015 without a documented procedure. This resulted in the panel being reinstalled without requiring a reinspection by Quality Control. The reinstalled installation was observed to be deficient in that holddown nuts (attached to Nelson studs) were either missing or were not torqued to design specification (snug-tight).

B. Response

1. Admission or Denial of Alleged Violation

We concur that safety-related instrument panel no. 1H22-P015 was removed after the inspection for panel setting had been completed.

2. Reason for Admitted Violation

JCI Construction Scheduling did not communicate with the JCI Quality Assurance Department as required by their procedure QAS-1101-PNPP, paragraph 4.2.1B and paragraph 5.2.

3. Corrective Action Taken and Results Achieved

The immediate corrective action taken by the Johnson Controls Incorporated (JCI) QA Manager was to issue a memo voiding all bolting inspections for all installed panels. The memo was placed in the applicable installation/fabrication (I/F) packages and previous inspection documentation was annotated as cancelled. Cancellation of previous inspections assures that the item will be reinspected.

Review of several panel installation/fabrication packages which have recently been turned over to Site Organization has verified the adequacy of the method of corrective action. All turned over installations were re-verified and documented as acceptable by JCI.

4. Corrective Action Taken To Avoid Further Noncompliance

The directive from the JCI QA Manager further stated that final inspection of panel installation is to be performed and documented at final walkdown.

JCI Procedure QAS-1101-PNPP, entitled "Control of Inspections", is presently in the process of being updated to address new requirements of the contract. When revised, a statement will be added to clarify the existing requirements. The clarification will specify that rework situations of installed installations require QA notification for assignment of new inspection hold points.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by September 30, 1983.