



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

October 14, 1983
PY-CEI/NRR-0074 L

Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Response to Request for Clarification
License Condition No. 7
TMI Action Plan Item II.B.3
Post Accident Sampling

Dear Mr. Youngblood:

This letter provides the additional clarifications requested by the staff regarding our September 16, 1983 submittal to you on the Perry Nuclear Power Plant Post Accident Sampling System (License Condition No. 7, TMI Action Plan Item II.B.3).

1. Clarification to Criterion 10:

All counting equipment is initially set/calibrated for approximately 10 different geometries. On a daily basis, the resolution and energy peak correlation for the point source geometry is checked. If the point source geometry is off, then it is recalibrated for all 10 geometries. The ion chromatograph is calibrated prior to use or approximately monthly (whichever is more frequent).

The chemistry technicians are requalified (i.e., receive refresher training) twice a year.

2. Clarification to Criterion 1:

Perry will have the capability to perform an on-site diluted boron analysis (including sampling) within the 3 hour time requirement. An off-site boron analysis is performed only on an undiluted sample and only as a backup analysis to verify the on-site diluted boron analysis. The off-site boron analysis (including sampling and transport times) requires more than 3 hours.

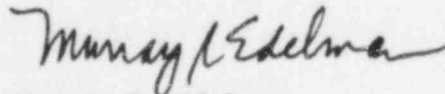
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3. Clarification to Criterion 2:

In CEI's response to Criterion 2, CEI did commit that a procedure for relating radionuclide concentrations to core damage would be written in accordance with the generic General Electric "Procedures for the Determination of the Extent of Core Damage Under Accident Conditions (NEDO-22215)." This same GE procedure was submitted to the NRC by the BWR Owners' Group in a letter dated June 17, 1983 (letter No. BWR O/G 83-24). In addition, LRG II submitted a position paper in a letter dated September 3, 1982 on the Estimation of Fuel Damage from Post-Accident Samples (3-CHEB) which referenced the General Electric report mentioned above. This position paper was endorsed by CEI in a letter dated September 16, 1982 from Mr. D. R. Davidson to Mr. J. R. Miller.

If you have any additional questions, please call.

Very truly yours,



Murray R. Edelman
Vice President
Nuclear Group

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cc: Jay Silberg, Esq.
John Stefano
Max Gildner