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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

January 10, 1984

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

RE: Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Response to I.E. Report

Dear Mr. Knop:

This letter is to acknowledge receipt of Inspection Report Number 50-440/83-34; 50-441/83-33 attached to your letter dated December 12, 1983. This report identifies areas examined by Mr. M. L. Gildner during his inspection conducted September 1 through October 31, 1983, at the Perry Nuclear Power Plant.

Attached to this letter is our response to the two Severity Level IV Violations described in the Notice of Violation dated December 12, 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,

Murray R Edelman

M. R. Edelman
Vice President
Nuclear Group

MRE:pab
Attachment

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

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

JAN 16 1984

RESPONSE TO ENFORCEMENT ITEMS

Below is our response to the Notice of Violation appended to United States Nuclear Regulatory Commission I.E. Report 50-440/83-34; 50-441/83-33.

I. Noncompliance 440/83-34-02

A. Severity Level IV Violation

10CFR50, Appendix B, Criterion XIII, states in part, "Measures shall be established to control handling...of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration."

CEI Corporate Nuclear Quality Assurance Program, Section 1300, states in part, "Measures shall be established by vendors, contractors, and the Nuclear Group to control the handling, storage and shipping of safety-related materials and equipment. These measures shall include but not be limited to:...d. Established storage procedures which include, as applicable, the following provisions: 1. Handling methods to avoid damage to equipment...7. Documentation and records data."

Contrary to the above, adequate measures were not established for lifting the Unit 1 Moisture Separator Assembly on September 15, 1983, from a temporary storage location inside the Unit 1 reactor pressure vessel, in that:

a. An inadequate traveler procedure was used to describe the method for determining the assembly's disengagement from the core shroud,

b. Records for the placement of the assembly into the vessel did not indicate that the assembly had been bolted down, and

c. Personnel performing the evolution were not familiar with the details of the bolting mechanism and relied on the adequacy of the process traveler.

B. Response

1. Admission or Denial of Alleged Violation

We concur that adequate measures were not clearly established for the lift of the Unit 1 Moisture Separator Assembly performed on September 15, 1983.

2. Reason for Admitted Violation

We concur with the reasons stated in I.E. Report 50-440/83-34; 50-441/83-33, Paragraph 4.a. which reflect the results of a misinterpretation of the contractor's lifting and rigging procedure by the contractor.

3. Corrective Action Taken and Results Achieved

The corrective actions taken as a result of the violation were as stated in the Senior Resident Inspector's report and are reiterated herein:

The polar crane was examined using recommendations of the crane manufacturer and certain designated components have been examined by NDE specialists. No damaged components were found.

The polar crane was recabled with certified cable as a precautionary measure, even though no damage to the original cable was found.

A replacement strongback was obtained and the Moisture Separator Assembly was successfully removed from the vessel on October 5, 1983. Visual and NDE examination of the components of the Moisture Separator Assembly and Core Shroud Assembly revealed no damage.

Additionally, relative to the potential damage which may have resulted from this incident [RDC 82(83)], final results of the evaluation conducted pursuant to 10CFR50.55(e) will be forwarded to the NRC as required.

4. Corrective Action Taken to Avoid Further Noncompliance

On September 21, 1983, CEI amended previous acceptance of the handling and lifting procedure in correspondence PY/SO-38/39-19866. This letter changed the acceptance to conditionally acceptable noting changes needed to be implemented in the procedure. In response, the contractor has now formally revised his procedure as follows:

To ensure full QA/QC coverage, the contractor's handling and rigging procedure GEP-GR-C01, paragraph 4.1.5.1, "Category A Classification", was revised to explicitly state that all lifts of reactor vessel components including the drywell head are Class A lifts.

The controlling procedure also specifically states that...

...detailed rigging sketches and travelers for handling operations shall be required.

...a briefing shall be held prior to the lift covering details of lift including installation or removal of item being lifted.

The contractor has also made changes in his internal procedures to ensure that any safety-related travelers which are terminated prior to completion fully document the exact as-left condition. Prior to re-initiation of the above travelers, the as-found component condition will be fully verified and documented.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on September 26, 1983, when the contractor submitted Revision 4 of the affected procedure for CEI approval. CEI approval without comment was given on November 2, 1983. During the interim period between the contractor submittal date and the CEI approval date, the contractor implemented the requirements of the conditionally accepted Revision 3 of procedure GEP-GR-0001.

II. Noncompliance 440/83-34-03

A. Severity Level IV Violation

10CFR50, Appendix B, Criterion II, states in part, "Activities affecting quality shall be accomplished under suitably controlled conditions. Controlled conditions include the use of appropriate equipment..."

CEI Corporate Nuclear Quality Assurance Program, Section 1300, commits the licensee to Regulatory Guide 1.38 and ANSI N45.2.2-1972.

ANSI N45.2.2-1972, Paragraph 7.3.2, states, "Hoisting equipment shall not be loaded beyond its rated load, as certified by the manufacturer, except for test purposes."

Contrary to the above, during the Moisture Separator Lift on September 15, 1983, an inoperative polar crane load cell resulted in the polar crane exerting a lifting force which was calculated to be greater than the load rating of the lifting strongback and the polar crane. The lifting force was only terminated by the failure of the lifting strongback.

B. Response

1. Admission or Denial of Alleged Violation

We concur with the inspector's observation that the polar crane load cell was inoperative at the time of this lift.

2. Reason

The polar crane load cell is an optional piece of equipment, the operation of which was not required by our program. It is possible that if it had been used the effects of the procedural misinterpretation identified in noncompliance 440/83-34-02 might have been mitigated.

3. Corrective Action Taken and Results Achieved

Since that event CEI has replaced the polar crane load cell and intends to calibrate it in conjunction with the next major lift.

4. Corrective Action Taken to Avoid Further Noncompliance

For all future lifts of the moisture separator, dryer, reactor insulation, reactor vessel head and drywell head administrative control shall be established and implemented to assure the polar crane is not loaded beyond its rated capacity. This control shall as a minimum consist of visual examination to verify the load is free and clear. If a visual examination can not be made the lift shall be conducted with an operable load cell.

5. Date of Full Compliance

Administrative control in addition to the contractor's handling and rigging procedure will be implemented prior to the next lift.