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November 4, 1983

MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

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 50-440/83-26; 50-441/83-25 attached to your letter dated October 5, 1983. This report identifies areas examined by Mr. N. Merriweather during his inspection conducted August 16-19, 1983, at the Perry Nuclear Power Plant.

Attached to this letter is our response to the one Severity Level V Violation described in the Notice of Violation dated October 5, 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.

Also attached is our response to the Deviation described in the Notice of Deviation dated October 5, 1983. This response describes the corrective action taken and the date of completion as requested in your letter.

Our responses have been submitted to you within thirty days of the date of the Notice of Violation and the Notice of Deviation 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
G PDR

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 Appendix A, Notice of Violation, of United States Nuclear Regulatory Commission I.E. Report 50-440/83-26; 50-441/83-25.

I. Noncompliance 440/83-26-01

A. Severity Level V Violation

10CFR50, Appendix B, Criterion III, as implemented by CEI Corporate Nuclear Quality Assurance Program Manual, Section 0300, states in part that, "design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design".

Contrary to the above, L. K. Comstock modified the bus bar support between 4160V switchgear cubicles EH1114 and EH1115 using guidance given in a letter (PY-SO-033-1677) provided by site engineering. This field change had not been reviewed and approved by the Nuclear QA Department and was not documented in accordance with approved procedures for field design changes.

B. Response

1. Admission or Denial of Alleged Violation

We concur with the inspectors observations regarding violation 440/83-26-01. The minor modification described in I.E. Report 50-440/83-26; 50-441/83-25 should have been authorized via a design document and not transmitted by letter.

2. Reason for Admitted Violation

The author of the letter intended to record discussions between the installing contractor, the equipment vendor and himself concerning minor installation difficulties. The letter, however, discussed one modification that was used by the contractor to continue installation activities. The Project Organization Engineer should have directed this change through an accepted design program document - Field Variance Authorization.

3. Corrective Action Taken and Results Achieved

Nonconformance Report OQC-0297 was initiated to describe the minor modification. The processing of the nonconformance report shall ensure that the proper engineering and quality assurance reviews of the field change are performed.

The engineering disposition of nonconformance report OQC-0297 will be prescribed after further examination of the field change. Since this will require de-energization of the bus bar, the examination will be performed during the next outage of the switchgear which is scheduled for late November.

Based upon the results of the examination, an evaluation will be made to determine the adequacy of the installation and prescribe further work if necessary.

4. Corrective Steps Taken to Avoid Further Violation

Project Organization Engineering personnel have been re-notified that:

- 1) design modification made during installation activities can only be achieved through the use of design documents,
- 2) the types of design documents and their processing shall be in accordance with program requirements,
- 3) deviation from these requirements has been and shall continue to be considered a violation of the Project's Quality Assurance Program.

5. Date When Full Compliance Will Be Achieved

Project Organization Engineering was re-notified of the items mentioned above in the "Corrective Steps Taken to Avoid Further Violation" on November 2, 1983.

Dispositioning of nonconformance report OQC-0297 will be achieved by December 16, 1983.

Below is our response to Appendix B, Notice of Deviation, of United States Nuclear Regulatory Commission I.E. Report 50-440/83-26; 50-441/83-25.

II. Deviation 440/83-26-03

ANSI N45.2.9 (1974) states in part that "a correction or supplement to a QA record shall include the date and the identification of the person authorized to issue such correction or supplement".

Contrary to the above, corrections made on a GAI Certificate of Inspection (Report No. 9128-79-9) did not identify the person or indicate the date corrections were made.

B. Response

1. Background

The purpose of the GAI Certificate of Inspection (COI) is to permit release of equipment from a vendor facility for shipment to the Perry Nuclear Power Plant. The COI is initiated with GAI Document Review Certifications which identify the documents that are reviewed by the GAI inspector during inspection of the equipment. Upon receipt of these documents, the vendor is required to incorporate them into the vendor documentation package. This package is then submitted to Perry.

The corrections made to the Attachment Bill of Material on the COI were typographical and were noted as such and corrected during receipt inspection at Perry. All other documents in the vendor documentation package, including the GAI Document Review Certifications and associated Inspection Reports, correctly identify the equipment.

2. Corrective Action Taken

A memorandum has been issued as a reminder to individuals in the Nuclear Quality Assurance Department who have records review and approval responsibilities to reiterate Project requirements for making corrections. These requirements conform to standard industry practice as delineated in ANSI N45.2.9 (1974).

3. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.