



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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November 11, 1983

MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

Mr. R. L. Spessard, Director
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
Response to I.E. Report

Dear Mr. Spessard:

This letter is to acknowledge receipt of Inspection Report Number 50-440/83-29; 50-441/83-28 attached to your letter dated October 14, 1983. This report identifies areas examined by Mr. N. Merriweather during his inspection conducted September 27-30, 1983, at the Perry Nuclear Power Plant.

Attached to this letter is our response to the one Severity Level IV Violation described in the Notice of Violation dated October 14, 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. C. E. Norelius, Director
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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 50-440/83-29; 50-441/83-28.

I. Noncompliance 440/83-29-01; 441/83-28-01

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, the following examples of inadequate procedures were identified:

1. There was no evidence of procedures for the development, review, approval and revision of the relay setting sheets within the Nuclear Construction Engineering Section and System Protection Section.
2. The control and distribution of the relay setting sheets was not addressed in approved procedure in both the Nuclear Construction Engineering Section and the System Protection Section.
3. Nuclear Test Section procedure 6-1202 is inadequate because it does not adequately reflect the distribution of the relay setting sheets.

B. Response

1. Admission or Denial of Alleged Violation

We concur with the inspector's observation concerning controlling procedures for relay setting sheets.

2. Reason for Admitted Violation

Nuclear Construction Engineering Section (NCES), Nuclear Test Section (NTS), and System Protection Section (SPS) personnel involved in the development and use of relay setting sheets at Perry were following a CEI standard practice for performing these activities. Relay setting sheet distribution was performed in accordance with a flow diagram referenced in the CEI Company's Testers' Manual.

3. Corrective Action Taken and Results Achieved

Several weeks prior to the inspector's observation, NCES had drafted a procedure to formally address development, review, approval, distribution, and revision of relay setting sheets by NCES and SPS. Included in the draft was the provision for independent design review performed in accordance with one of the methods discussed in CEI letter no. PY-CEI/GAI-3371 and Gilbert Associates, Incorporated letter no. PY-GAI/CEI-10117. This draft was in the review cycle at the time of this inspection.

Procedure 3-0310, "Setting Change Request," has now been issued. Additionally, the related NTS procedure 6-1202 has been revised to adequately reflect the distribution of relay setting sheets.

4. Corrective Steps Which Will Be Taken To Avoid Further Violation

All existing safety-related relay setting sheets will be reviewed by the respective initiating organizations to verify that each was signed by an individual qualified to perform an independent design review on relay setting sheets. An independent design review will be performed on those sheets not previously signed by a qualified individual.

The issuance of NCES procedure 3-0310 and the revision to NTS procedure 6-1202, including training of appropriate personnel, ensures that relay setting sheets are adequately developed, reviewed, approved, distributed, and revised.

5. Date When Full Compliance Will Be Achieved

Review of existing safety-related relay setting sheets will be complete on or before December 30, 1983. We will then be in full compliance.