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MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

December 16, 1983

Mr. W. S. Little, Chief
Engineering - Branch II
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. Little:

This letter is to acknowledge receipt of Inspection Report Number 50-440/83-33; 50-441/83-32 attached to your letter dated November 17, 1983. This report identifies areas examined by Mr. N. Merriweather during his inspection conducted October 25-28, 1983, at the Perry Nuclear Power Plant.

Attached to this letter is our response to the two Severity Level V Violations described in the Notice of Violation dated November 17, 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
Division of Projects and Resident Programs
U.S. Nuclear Regulatory Commission, Region III
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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 50-440/83-33; 50-441/83-32.

I. Noncompliance 440/83-33-01

A. Severity Level V Violation

10CFR50, Appendix K, Criterion XV as implemented by CEI Corporate Nuclear Quality Assurance Program Manual, Section 1500, states in part that "measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use of installation."

Contrary to the above, Johnson Controls Incorporated (JCI) incorrectly voided Nonconformance Report No. JCI-172 without adequate documentation to support the actions taken.

B. Response

1. Admission or Denial of Alleged Violation

We concur that Johnson Controls, Incorporated, Nonconformance Report (NR) No. 172 was improperly voided. Evaluation of NR #172 revealed that the backup documentation required for the voiding of the NR was insufficient.

2. Reason for Admitted Violation

Human error is cited as the cause for this violation. During the documentation review cycle for JCI NR #172, the In-Process Inspection Supervisor misinterpreted the existing backup documentation. As a result of his actions, the NR was inadvertently voided.

3. Corrective Action Taken and Results Achieved

Site Organization performed audit #883, dated August 16 and 17, 1983, which resulted in the issuance of 2 action requests. Included in the scope of the audit were NR tracking, close-out, and voiding processes. The audit team selected at random 18 nonconformance reports and determined their status per the existing JCI NR procedure QAS-1601-PNPP Revision 14. The evaluation indicated that JCI was properly implementing the major requirements of their program. One minor item identified and documented on AR-002 concerned their use of hold tag status review sheets. This item was subsequently corrected via procedure revision.

Of major concern during the course of Audit 883 was the NR voiding process. As indicated by the review of JCI NR 172, the NR voiding program was not being properly implemented. Therefore, all of the JCI NRs voided to date were reviewed by the audit team. Results revealed that all but 3 of 44 NRs checked were justifiably voided. Action request 001 was issued to document the finding. New nonconformance reports were also issued.

Because of the seriousness of the action requests, JCI committed to revising procedure QAS-1602-PNPP and clearly defining the NR voiding process.

4. Corrective Action Taken to Avoid Further Noncompliance

JCI procedure QAS-1602-PNPP was revised to clearly describe the NR voiding process. The revision defined areas of responsibility and provided detailed instructions for completing "Nonconformance Void Form". The Void Form is attached to the subject NR and remains on file with the affected documents.

Since issuance of the Audit 883 Action Requests, Construction Quality Section has continued to review all voided nonconformance reports. No new problems have been identified. Johnson Controls Incorporated is working in accordance with their latest approved nonconformance procedure.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved November 23, 1983.

II. Noncompliance 440/83-33-03

A. Severity Level V Violation

10CFR50, Appendix B, Criterion XVI as implemented by CEI Corporate Nuclear Quality Assurance Program Manual, Section 1600 states in part that "measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected."

Contrary to the above, L. K. Comstock (the electrical contractor) closed out Inspection Report No. 4491 without implementing the required corrective action.

B. Response

1. Admission or Denial of Alleged Violation

We concur with the inspector's observation that L. K. Comstock (LKC) Inspection Report #4491 was closed improperly as stated in Inspection Enforcement Report 50-440/83-33; 50-441/83-32.

2. Reason for Admitted Violation

LKC Inspection Report #4491 was written to document the discrepancy between a drawing and a termination card. The Inspection Report was dispositioned stating that the drawing has been revised to indicate the circuit as 1E12C-119B instead of 1E21C-119B.

The inspector then signed the Inspection Report as dispositioned acceptable. However, the drawing had not been revised to indicate the change.

An error on the part of the inspector occurred in that he accepted the disposition when in fact it had not been completed.

3. Corrective Action Taken and Results Achieved

The discrepant condition was documented on Contractor Inspection Report #7564 as well as Nonconformance Report P033-2365 (LKC 2504).

Engineering Change Notice 16282-33-2778 was issued 12/8/83 correcting the circuit number on the drawing. Posting of the Engineering Change Notice on drawing D-209-100 Sheet 132 Revision D was verified by the contractor on Inspection Report #8248.

4. Corrective Action Taken to Avoid Further Violation

Training was administered to both the craft and Quality Control personnel on the procedure 4.3.6, "Instructions for Cable/Wire Terminations." Training was completed on December 15, 1983.

5. Date of Full Compliance

Based on the issuance of Engineering Change Notice #16282-33-2778 on 12/8/83, the close-out of Inspection Report #7564 and #8248 on December 15, 1983, and December 15, 1983, respectively, and the verified disposition of Nonconformance Report #P033-2365 (LKC #2504) on December 15, 1983. Full compliance has been achieved.