



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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April 26, 1984

MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

Mr. James G. Keppler
Regional Administrator, Region III
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

RE: Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Deficiency in the Class 1E Low
Voltage Switchgear RDC [68(83)]

Dear Mr. Keppler:

This letter serves as our final report pursuant to 10CFR50.55(e) concerning the defect associated with the Class 1E Low Voltage Switchgear furnished by Brown Boveri Electric (BBE). Initial notification that this problem was being evaluated by The Cleveland Electric Illuminating Company (CEI) was made to your office on March 29, 1983, by Mr. E. Riley of CEI. Previously submitted correspondence on this subject was transmitted April 27, 1983, and November 29, 1983. On December 22, 1982, Brown Boveri notified the Nuclear Regulatory Commission, under 10CFR21, of a deficiency in the low voltage switchgear.

This report contains a description of the deficiency, an analysis of safety implications, and the corrective action taken.

Description of the Deficiency

Brown Boveri Electric supplied forty Class 1E low voltage switchgear enclosures to the Perry Nuclear Power Plant (PNPP), Units 1 & 2. On March 16, 1983, BBE QA representative and PNPP site personnel conducted an on-site inspection of the low voltage switchgear to verify that spot welds and equivalent arc welds were in accordance with drawing and manufacturing procedures.

One enclosure, cubicle EF2C05, was found to be missing spot welds and equivalent arc welds in the rear section connecting the rear vertical corner channel with the rear horizontal channel. It had been determined by BBE that the nonconforming condition was caused by manufacturing equipment limitations.

Analysis of Safety Implications

Because of the nonconforming condition on cubicle EF2C05, the seismic integrity of the cubicle was in question. Currently, this cubicle is designed as "future" on the Perry Nuclear Power Plant one-line drawings. If this condition is left uncorrected, the potential would exist that if this cubicle is utilized, any electrical load controlled by it would be unavailable after a seismic event.

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Corrective Action Taken

Rather than perform a detailed evaluation on seismic acceptability of the cubicle, BBE elected to provide a welding fix for this cubicle. Supporting the fix, BBE supplied the required instructions and a qualified welding procedure. The site electrical contractor did not have in place a procedure which covered BBE welding requirements. Site Engineering then evaluated and accepted an equivalent site approved welding procedure for utilization on cubicle EF2C05.

Nonconformance Report CQC-2666 was issued to track the required repair. Completion of the welding fix is anticipated by May 31, 1984.

Please call me if there are additional questions.

Sincerely,

P. Kaplan for M. Edelman

M. R. Edelman
Vice President
Nuclear Group

MRE:pab

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

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