



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN

VICE PRESIDENT  
NUCLEAR

April 19, 1984

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  
SALP Report

Dear Mr. Keppler:

This refers to our meeting in your offices conducted on April 10, 1984, to discuss the findings and observations of your staff which are reflected in the most recent SALP Evaluation for Perry Nuclear Power Plant Units 1 & 2. I would like to thank you and your staff for your overall evaluation of our activities for the period of the report (October 1, 1982 through December 30, 1983). The discussion with your staff at the meeting was very helpful to us.

In accordance with the SALP process, The Cleveland Electric Illuminating Company (CEI) submits the following comments:

We are in general agreement with the "Summary of Significant SALP Report Findings" contained in Enclosure 1. These comments and those in the SALP Report itself indicate to us that the SALP Board and NRC management recognize the strong commitment to quality being maintained by The Cleveland Electric Illuminating Company.

With respect to the ratings contained in Section III of the SALP Report:

- A. The Category I rating in one functional area is appreciated. This recognition of good performance serves as added incentive to the Project Organization to maintain this level of performance.
- B. We accept the ratings in all functional areas except Functional Area 7. With regard to the rating in "Licensing Activities", we would like to reiterate that this rating should be upgraded. As was discussed at the meeting, we also wish to offer additional information for Functional Areas 2, 9 and 10 to clarify specific issues raised in the SALP Report. Comments on these areas are contained in the next four items.

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- C. With regard to Functional Area 2, relative to identification of piping and pipe support/restraint deficiencies during Quality Control construction acceptance inspection or during the "as-built" verification program, these programs have been strengthened and are presently undergoing further refinement.

Relative to Information Notice 83-80, entitled "Use of Stiff Pipe Clamps", the following NRC concerns were detailed:

1. Piping designers must be aware of clamp-induced stresses on piping.
2. Post-installation control, i.e. special maintenance, of the clamp may be necessary where proper clamp function requires high values of torque on clamp bolting.

Although this issue is not expected to represent a problem at PNPP, the interest expressed by the NRC has necessitated the following action to address their specific concerns.

1. As our Architect/Engineer did not explicitly consider the effect of clamp-induced loads in past pipe stress analysis, an engineering evaluation is being undertaken to consider these effects using appropriate pipe clamp applications in PNPP ASME Class 1 piping systems.
  2. The Nuclear Construction Engineering Section has taken steps to ensure that installation and maintenance requirements are transmitted to the Perry Plant Department Maintenance Section. In addition, special torquing equipment procured by the installation contractor will be transferred to Perry Plant Department upon completion of work.
- D. As discussed at the meeting with regard to Functional Area 7, the SALP Report and rating on Licensing Activities are of concern since CEI takes pride in our commitment to timely, complete and accurate responses to the staff's technical questions and data requests. This commitment has been evidenced by the resolution of 37 outstanding technical issues (includes outstanding issues, confirmatory issues, and license conditions) in SER Supplements #2 and #3 and the submittal of responses which closed an additional 15 issues in Supplement #4. In addition, our responsiveness was also evidenced by our timely responses to staff requests for additional information in areas such as instrumentation and control system, quality assurance, power systems, and materials engineering. It should be noted that our responses to the technical requests in mechanical engineering, fire protection and equipment qualification areas, identified in the SALP report, were complete. Further information was promptly furnished following discussions with the staff in which supplemental requests and/or clarifications were provided.

Recent events - the successful environmental equipment qualification audit in January and the resolution of all outstanding fire protection issues in SER Supplement #4 - confirm the technical thoroughness and adequacy of CEI's responses to the staff's questions in these areas.

There is one characteristic of the Licensing process that should be recognized, i.e. the easy issues get resolved early, whereas the difficult/potentially big impact items take time to resolve. We are now in the latter position. The remaining issues require much work, produce divergent opinions on acceptable solutions between applicant and staff and often require discussions and meetings to define an adequate response. CEI has always been ready to meet with the staff to better understand their requests. As in the past, we will continue to maintain our philosophy of being responsive to the NRC in all phases of the licensing process.

- E. With regard to Functional Area 9, relative to staffing of the Health Physics Unit, an individual with extensive BWR experience recently accepted the second Unit Supervisory position. Also, three additional technicians having commercial experience have been hired. To enhance the classroom training received by four other technicians, they have been sent to an operating power plant for three months of experience training. Additionally, the support offered by the Nuclear Design and Analysis Section has been enhanced by the hiring of the Corporate Health Physics Specialist.

Relative to the environmental program items discussed, installation of the loudspeaker warning system for Lake Erie boaters was started in mid-March and completion is projected for May 1, 1984. Corrective action for shoreline erosion occurring adjacent to the north parking lot was completed last year. General housekeeping in the barge slip area is an ongoing effort which receives appropriate attention seasonally.

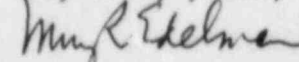
- F. With regard to Functional Area 10, concerning Nuclear Test Section activities, since the time of the referenced inspection during which the inspector observed that the system test engineers appeared to be overburdened with responsibilities, we have created a Systems Completion Group. This group has relieved the workload of the test engineer and lets him concentrate on testing instead of construction completion.

Additionally, the Turnover Control program and procedures have received much attention and are presently in the final stages of review to streamline and improve the system.

The Test Procedure Review Committee was not governed by a formal procedure or charter at the time of inspection. Since that time a formal procedure has been issued describing and governing committee activities.

My sincere appreciation again to you and your staff for their efforts on this SALP review.

Very truly yours,



M. R. Edelman  
Vice President  
Nuclear Group

MRE:pab

cc: Mr. M. L. Gildner  
NRC Site Office

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