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July 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
Electrical Penetrations (1R72)
Potential Defect Concerning
ASME Section III Material
[RDC 81(83)]

Dear Mr. Keppler:

This letter serves as our final report pursuant to 10CFR50.55(e) on the potential defect associated with the Class 1E electric penetrations (1R72) furnished by Westinghouse Electric Corporation. Mr. J. Konklin of your office was notified on August 24, 1983, by Mr. E. Riley of The Cleveland Electric Illuminating Company that this problem was being evaluated. Our interim reports on this subject were dated September 15, 1983; December 1, 1983; and April 3, 1984.

Our evaluation has determined that this potential defect is not reportable pursuant to the requirements of 10CFR50.55(e).

Description of Deficiency

Westinghouse Electric Corporation supplied Class 1E electrical penetrations to the Perry Nuclear Power Plant (PNPP) under procurement specification 563. This specification requires that materials for pressure retaining parts of the electrical assembly be in accordance with ASME Section III, Subsection NE. Twenty-six penetrations were identified containing bulkhead material of indeterminate status relative to procurement requirements of ASME Section III.

Completion of Reportability Evaluation

A review of the procurement and handling history of the material was made by Perry Nuclear Power Plant Project personnel during a September 21, 1983, meeting with Westinghouse. It was concluded from that meeting that ASME Code Case N242 could be utilized. Confirmation that the bulkhead material was

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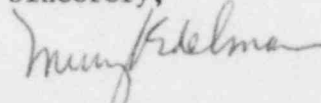
that as represented by the material test report was needed. Because all bulkhead material in question was from one material heat number, samples were removed from three of the affected penetrations and a chemical analysis performed. Review of the results of the chemical analysis by Project Organization confirmed that the material is as represented by the original material test report.

With these results, it is our intention to utilize ASME Code Case N242 for the bulkhead material. Engineering Change Notice 21802-363-05 has been initiated to revise the original procurement specification to permit the use of the Code Case and documentation update as required. The additional requirements identified in the United States Nuclear Regulatory Commission Regulatory Guide 1.85 for use of the Code Case will be complied with.

Project Organization Nonconformance Report OPQC 480 had been written to identify the indeterminate status of the bulkhead material and will remain open until all action is completed.

Please call if there are any additional questions.

Sincerely,



Murray R. Edelman
Vice President
Nuclear Group

MRE:pab

cc: Mr. J. A. Grobe
NRC Site Office

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