



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN

VICE PRESIDENT  
NUCLEAR

April 29, 1985  
PY-CEI/NRR-0208 L

Mr. B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Perry Nuclear Power Plant  
Docket Nos. 50-440; 50-441  
Response to Request for  
Additional Information/Clarification  
of Changes in Chapter 17.2 of the  
Perry Nuclear Power Plant FSAR.  
SER Confirmatory Issue (59)

Dear Mr. Youngblood:

This letter and its attachments respond to your February 11, 1985 letter in which you requested additional information/clarification of changes in Chapter 17.2 of the Perry FSAR. This correspondence is also a response to SER Confirmatory Issue (59) which was added in SER Supplement No. 5.

This information will be incorporated, as appropriate, into a future FSAR Amendment. If you have any questions, please feel free to call me.

Very truly yours,

Murray R. Edelman  
Vice President  
Nuclear Group

MRE:njc

Attachments

cc: Jay Silberg, Esq.  
John Stefano (2)  
J. Grobe

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Item 1

FSAR Amendment 15, Section 17.2.1.3.2.1.1, lists 11 responsibilities of the Managers of the Perry Plant Operating Department (PPOD) and Perry Plant Technical Department (PPTD). Identify the responsibilities of each manager or justify not doing so. Similarly, in Section 17.2.3.3.1, 17.2.8.3.1, and 17.2.11.3.1, 17.2.12.3.1, 17.2.13.3.1, 17.2.13.4.1, 17.2.15.3.1, and 17.2.16.3.1 of FSAR Chapter 17, clearly identify which of these two managers is responsible for the functions(s) listed. Clarify Section 17.2.11.1 to show whether testing alternatives require approval by both Managers (PPOD and PPTD) or only one of them (if so, which one?).

Response

1(a) Both managers have responsibilities for the various items/activities covered in Section 17.2.1.3.2.1.1 listed on pages 17.2-3a and 17.2-4. The scope of their individual responsibilities is dictated by the responsibilities assigned to their reporting elements, as summarized in FSAR Section 13.1.2.2.1 (Perry Plant Operations Department) and Section 13.1.2.2.2 (Perry Plant Technical Department).

Listed below are the functions in question as they apply to the managers (PPOD/PPTD).

| <u>FSAR Section</u> | <u>Manager - PPOD</u>  | <u>Manager - PPTD</u>  |
|---------------------|--|--|
| 17.2.1.3.2.1.1 (a)  | X (Operations Section)   |  |
| (b)                 | X (Operations Section)   |  |
| (c)                 | X (Operations, Maint. repair, refueling)                       | X (I&C testing & repair, reactor engrg., plant engrg.)   |
| (d)                 | X (Administrative, Operations, repair, maintenance)            | X (I&C testing & reactor engrg., health physics, emergency procedures)                                   |
| (e)                 | X (tagouts, draining of systems)                               | X (design changes, designation of exclusion areas)   |
| (f)                 | X (Maintenance Section)  |  |
| (g)                 |  | X (Perry Training Section)   |
| (h)                 | X (Maintenance Section)  |  |
| (i)                 |  | X (Technical Section)  |
| (j)                 |  | X (Radiation Protection Sect.)   |
| (k)                 | X (Outage Planning Section)                                    |  |
| 17.2.3.3.1          | X (recommending design changes & modifications, installations) | X (recommending design changes & modifications, verifications of approval, assuring proper installation) |

(Item 1 Response Continued)

| <u>FSAR Section</u> | <u>Manager - PPOD</u>  | <u>Manager - PPTD</u>  |
|---------------------|--|--|
| 17.2.8.3.1          | X (Maintenance Section)  |  |
| 17.2.11.3.1         | X (NTS - preop testing)  | X (Technical Section-<br>Startup testing)  |
| 17.2.12.3.1         | X (All Sections - purchase, storage, use)  | X (All Sections -<br>purchase, storage use)<br>X (Tech. Section-<br>Calibration) |
| 17.2.13.3.1         | X (Maintenance Section)  |  |
| 17.2.14.3.1         | X (Maintenance Section -<br>work order scheduling<br>& tracking)<br>(Operations Section-<br>Control Room Test Log,<br>approval of Tech. Spec.<br>surveillance test results)<br>X (All sections - Prep. of<br>Periodic Test Instructions<br>& sched. of tests)<br>X (Operations Sections -<br>maintain operating<br>status) | X (Technical Section-<br>Tech. Spec. Surveillance Program)                       |
| 17.2.15.3.1         | X (Maintenance Section)  | X (Technical<br>Section)   |
| 17.2.16.3.2         | X (All sections)   | X (All Sections)   |

- 1 (b) Testing alternatives during initial start-up as noted in Section 17.2.11.1 require the recommended approval of the Plant Operations Review Committee (PORC), chaired by the Manager, Perry Plant Operations Department. Overall responsibility for the Startup Test Program is assigned to the Manager, Perry Plant Technical Department.

Item 2

Identify who (by position title) is responsible for the activities assigned to the Superintendent, Plant Operations, in FSAR Amendment 14. This position is no longer shown in FSAR Amendment 15.

Response

Responsibility for operations, maintenance and pre-operational testing are assigned to the Perry Plant Operations Department Manager who previously served as Superintendent, Plant Operations. The position of Superintendent, Plant Operations, was eliminated. Responsibility for technical activities is assigned to the Technical Superintendent, Perry Plant Technical Department. These changes were incorporated in Amendment 15 for FSAR Sections 13.1.2.2.1, 13.1.2.2.2 and in Table 13.1-3 (Resumes #19 and #20).



Item 3

Identify who (by position title) is responsible to direct the planning of major maintenance repairs and overhauls and preventive maintenance activities which were assigned to the General Supervisor, Maintenance Section in FSAR Amendment 14. This responsibility is no longer assigned to this position in FSAR Amendment 15.

Response

Responsibility for directing the planning and supervision of major maintenance repairs and overhauls and preventive maintenance activities still rests with the General Supervisor, Maintenance Section. FSAR Section 17.2.1.3.2.1.1.2 will be corrected in the next amendment to correspond with Section 13.1.2.2.1, page 13.1-13.

Item 4

Section 17.2.1.3.1.1.1.3 of FSAR Amendment 15 refers to the position of Superintendent, Plant Operations, which has apparently been eliminated. Clarify.

Response

The position of Superintendent, Plant Operations was eliminated effective with the reorganization of the Perry Plant Department into the Perry Plant Operations and Perry Plant Technical Departments. (See response to Question #2.)

Item 5

The degree of conformance to Regulatory Guide 1.58 was changed in FSAR Amendment 15 (page 1.8-12) to address section C.5 and C.6 of the Regulatory Guide for personnel involved in gas leak testing. In accordance with Implementation portion of the Regulatory Guide, also address sections C.7, C.8 and C.10 of this Regulatory Guide or justify not doing so.

Response

CEI's overall compliance with Regulatory Guide 1.58 was addressed in letter number PY-CEI/NRR-0222L dated April 2, 1985. Sections C.7, C.8 and C.10 were addressed in this response. The FSAR will be amended to reflect this change.

Item 6

The second exception to Regulatory Guide 1.88 (FSAR page 1.8-21) refers to ANSI PH 1.43-1979. We have been unable to locate a 1979 issue of this standard. We have located a 1981 issue and request that you reference it or supply a copy of the 1979 issue.

Response

ANSI PH 1.43-1979 is a document copyrighted by the American National Standards Institute, Inc. with all rights reserved. This ANSI Standard can be obtained from the American National Standards Institute, 1430 Broadway, New York, New York 10018.



Item 7

The first clarification to Regulatory Guide 1.123 (FSAR page 1.8-29) permits others to disposition nonconformance "use-as-is" or "repair" on behalf of CEI. Describe measures which assure that CEI is aware when any such disposition is made.

Response

All nonconformances dispositioned "use-as-is" or "repair" by suppliers qualified by CEI as design agents on behalf of CEI are required to be submitted to CEI at the time equipment is received on site. If CEI determines that a disposition has been incorrectly made, a nonconformance report is generated onsite to document the problem and to effect resolution.