



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

May 17, 1985

PY-CEI/OIE-0049 LQ

Mr. R. L. Spessard, Director
Division of Reactor Safety
U.S. Nuclear Regulatory Commission, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

RE: Perry Nuclear Power Plant
Docket No. 50-440; 50-441

Dear Mr. Spessard:

This letter is to acknowledge receipt of Inspection Report 50-440/85014 attached to your letter dated April 17, 1985. This report identifies areas examined by Mr. R. A. Westberg during his inspection conducted March 12-15 and 25-29, 1985, at the Perry Nuclear Power Plant.

Attached to this letter is our response to the Notice of Violation dated April 17, 1985. 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,

Murray R. Edelman
Vice President
Nuclear Group

MRE:sab
Attachment

cc: Mr. J. A. Grobe
USNRC Site, SBB50

Mr. D. E. Keating
USNRC Site, SBB50

U.S. Nuclear Regulatory Commission
Document Control Desk
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RESPONSE TO ENFORCEMENT ITEMS

Below is our response to the Notice of Violation appended to United States Regulatory Commission I.E. Report 50-440/85014.

1. Noncompliance 440/85014-03A&B

A. Severity Level V Violation

10CFR50, Appendix B, Criterion V, as implemented by the Cleveland Electric Quality Assurance Plan, requires that (1) activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings, and (2) instructions, procedures or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining the important activities have been satisfactorily accomplished.

Contrary to the above, the inspector identified the following:

1. The critical characteristics of items, to be verified during receiving inspection, were not specified by the procurement documents as required by PA-0407, Attachment 2.
2. Vendor supplied identification numbers were not positively verified as required by NQADP-1002, Paragraph 6.2.4.
3. Procedure No. NQADP-0702 did not provide adequate guidance to ensure the validity of supplier quality certificates.
4. Material conformance tags were not marked with the shelf life expiration date as required by PAP-0701, Paragraph 6.2.7.

B. Response

1. Noncompliance example 440/85014-03A.

a. Corrective Action Taken and Results Achieved

Procedure PA-0407 requires identification of critical characteristics for Commercial Grade Items

only. Per PA-0407, the Procurement Document Engineering Evaluation Basis (PDEEB) document contains the listing of these characteristics. Critical characteristics are being identified for Commercial Grade Items previously evaluated on PDEEBs to supplement the PDEEBs prior to new procurement of the item. Quality Control Record Cards (QCRC) will be generated, or revised, as appropriate, to transmit inspection/testing requirements to Receipt Inspection.

After identification of critical characteristics for Commercial Grade Items received, an evaluation of these items will be made to determine the basis for acceptability. Verification testing and/or vendor surveys will be performed as appropriate.

Verification testing for O-rings purchased Commercial Grade is presently in process. A sample lot of O-rings has been selected and sent to a qualified testing laboratory for material verification. NR OPQC 1441 has been generated identifying all Commercial Grade O-rings as nonconforming pending receipt of the test results.

b. Corrective Action Taken to Avoid Further Noncompliance

Commercial Grade PDEEBs presently issued are having critical characteristics identified. All organizations involved in the identification and/or verification of critical characteristics for Commercial Grade Items have been notified of this requirement and instructed to comply with procedures. Procurement Quality Engineering personnel have additionally been instructed to ensure that critical characteristics are appropriately identified for all future procurement of Commercial Grade Items.

c. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by August 1, 1985.

2. Noncompliance example 440/85014-03B.

NOTE: This noncompliance incorporates items 2, 3, and 4 identified in the Notice of Violation.

a. O-Ring Identification Numbers

1. Corrective Action Taken and Results Achieved

The discrepancy between the Apple Rubber Product Part numbers identified on the Certificate of Conformance (COC) and the Dowdy Rubber Co. part numbers identified on the packing list was identified by Receipt Inspection at the time of inspection and brought to the attention of the Responsible Quality Engineer. Investigation by the QE determined that this discrepancy was not significant. Both part numbers were based on the SAE AS-568 standard with the Apple Rubber Product numbers having an ARP prefix in place of the AS prefix. Acceptance of the receiving documentation by the QE is noted on the Receiving Inspection Report and COC by his signature and date.

2. Corrective Action Taken to Avoid Further Noncompliance

This discrepancy developed as a result of evaluating O-ring part numbers listed in the Apple Rubber Products parts catalog and using these numbers in the Purchase Order. The O-ring supplier with whom P.O. Q-2171-41 was placed only supplies O-rings from the Dowdy Rubber Co. This error in the part number has been corrected. To prevent recurrence, O-rings are now ordered by the AS-568 number.

3. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

b. Supplier Quality Certificates

1. Corrective Action Taken and Results Achieved

The program addressing verification of the validity of supplier quality certificates has been addressed in instruction 81-0707. This instruction requires that an evaluation be performed of suppliers providing quality certificates. The evaluation will consist of one or more of the following: supplier program

review, plant inspection/surveillance, product verification, and information from external sources.

Surveys have been conducted of two (2) O-Ring distributors with the results determining that the certificates supplied are acceptable.

2. Corrective Action Taken to Avoid Further Noncompliance

The program for evaluating the validity of supplier quality certificates has been established in instruction 81-0707.

3. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by June 21, 1985, through implementation of instruction 81-0707.

c. Shelf Life

1. Corrective Action Taken and Results Achieved

Applicable shelf life expiration dates are now identified on Material Conformance tags at receipt inspection. Receipt Inspection personnel have been instructed to specifically address shelf life requirements during their inspection activities when shelf life requirements are identified on the purchase order and/or QCRC.

Shelf life expiration dates are being assigned to parts in the Warehouse when applicable. Parts identified as having shelf life requirements will be tracked per instruction SMI-0006. Prior to full implementation of this program, Receipt Inspection personnel will review shelf life applicability and shelf life expiration dates against program requirements at the time of issuance.

2. Corrective Action Taken to Avoid Further Noncompliance

Shelf life requirements are presently being identified on the QCRC under the category

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"Documentation". The QCRC form is being revised to add a specific "Shelf Life" category.

3. Date When Full Compliance Will Be Achieved

Full implementation of the shelf life program will be achieved by August 1, 1985.