



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN  
VICE PRESIDENT  
NUCLEAR

June 21, 1985

PY-CEI/OIE-0070 L

Mr. R. F. Warnick, Chief  
Reactor Projects Branch 1,  
Division of Reactor Projects Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

RE: Perry Nuclear Power Plant  
Docket Nos. 50-440; 50-441

Dear Mr. Warnick:

This letter is to acknowledge receipt of Inspection Report 50-440/85010; 50-441/85005 attached to your letter dated May 24, 1985. This report identifies areas examined by Messrs. J. A. Grobe, J. W. McCormick-Barger and G. F. O'Dwyer during their inspection conducted February 12 through April 29, 1985, at the Perry Nuclear Power Plant.

Attached to this letter is our response to the Notice of Violation dated May 24, 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

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

Mr. D. E. Keating  
USNRC Site, SBB50

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

## RESPONSE TO ENFORCEMENT ITEM

Below is the response to the Notice of Violation appended to United States Nuclear Regulatory Commission IE Report No. 50-440/85010; 50-441/85005.

### I. Noncompliance 440/85010-01

#### A. Severity Level IV Violation

10CFR50, Appendix B, Criterion V, "Instructions, Procedures and Drawings," as implemented by the applicant's CNQAP, Section 0500, Revision 6, "Instructions, Procedures and Drawings," and the applicant's QAP, Section 5, Revision 0, "Procedures, Instructions and Drawings," requires that activities affecting quality shall be prescribed by and accomplished in accordance with appropriate documented instructions, procedures, or drawings.

Contrary to the above, there were numerous examples, as documented in Paragraphs 5, 6.b, and 11, of the enclosed Inspection Report No. 440/85010 (DRP); 441/85005 (DRP), of inadequately controlled conditions for quality related equipment, inadequate and inconsistent procedures controlling quality related equipment, protection and housekeeping activities, and inadequate implementation of equipment protection procedures. These deficiencies involve protection of new fuel, reactor vessel internals and field installed instruments, instrument lines and transmitters.

#### B. Response

##### 1. Corrective Action Taken and Results Achieved

The Cleveland Electric Illuminating Company (CEI) has taken the following actions to resolve the housekeeping and program discrepancies identified by the Inspector:

- o The structural steel in the Fuel Handling Area of the Intermediate Building over the fuel pools has been cleaned of debris. During construction completion activities, the fuel has been protected from dirt and debris by a cover sheet whenever fuel handling activities were not in progress. A change to Procedure PAP-0204, "Housekeeping/

Cleanliness Control Program", has been initiated to specify that cleaning activities performed to meet quality requirements are to be performed in accordance with PAP-0905, "Work Order Process".

- o The controls necessary to prevent the introduction of foreign material into the Fuel Handling Area fuel pools have been specified by the Reactor Engineer as required by PAP 1303, Section 6.3.3.2. These requirements have been posted at the access control point into the fuel storage areas and are applicable to anyone entering the pools, working over the pools, or working within 3 feet of the pools.
- o Test Engineers and Operations personnel have been instructed to ensure that equipment under their jurisdiction is adequately protected and to request installation of protection where needed. The specific examples of inadequate equipment protection identified by the inspector have been resolved; no equipment damage was identified.
- o Updated Housekeeping Floor Plans per PA-0206 were issued in March 1985. These floor plans classified the Control Room as Zone V with the additional requirement of controlled access. The reactor vessel was classified as Zone III with the additional requirement of shoe coverings and clothing change. This reactor vessel classification remained in effect per PA-0206 until just prior to opening of the reactor vessel in June.
- o Prior to opening of the reactor vessel in June, cleanliness requirements were specified through use of Perry Plant procedure PAP-0204 rather than GEP-AP-0011. The reactor vessel, its associated pool, and the refueling bridge and auxiliary platform (when either one or both are over the pool) have been designated as Cleanliness Zone A with requirements equivalent to ANSI N45.2.3-1973 Zone III as endorsed by Regulatory Guide 1.39 Revision 2, plus shoe covering and clothing change. To ensure these requirements are met, an access control point has been established where personnel are made aware each day of the cleanliness zone requirements. This post is manned by security personnel instructed to enforce the personnel clothing and material requirements. These actions and the use of cloth instead of paper coveralls for work inside the reactor vessel

and its associated pool will result in more effective implementation of cleanliness requirements. These access requirements will remain in effect until the drywell head is set on its flange prior to the Drywell Structural Integrity test.

- o Perry Plant procedure PAP-0204 is currently being revised to specify five (5) Cleanliness Zones (I-V) based on the guidance of Regulatory Guide 1.39 Revision 2. The FSAR Table 1.8 will be revised to reflect this change. The additional clarification of requirements resulting from these changes will provide assurance that cleanliness requirements are understood and implemented.

2. Corrective Action Taken to Avoid Further Noncompliance

The Cleveland Electric Illuminating Company recognizes the importance of plant housekeeping and has made improved housekeeping a significant milestone in the transition from the construction phase to an operating plant. To accomplish this goal, the following actions have been initiated:

- o A plant appearance improvement program has been established to identify specific goals and allocate additional resources for these goals. This program will result in significant improvements in plant appearance by July 1, 1985.
- o Gang tool boxes, lunch and meeting areas, prefabricating activities, unused welding and air lines and other construction items are being removed from Unit 1 on a priority basis.
- o Management policy and plant requirements for housekeeping, equipment protection and decorum are being discussed at the weekly Operations Overview Meeting.
- o Additional security personnel are being utilized to control access to areas of the plant which are essentially complete and to patrol other areas.

Direct management monitoring of plant housekeeping and of status of milestones in the plant appearance improvement program has been instituted. This monitoring is intended to ensure that Project personnel recognize CEI's commitment in this area.

3. Date When Full Compliance Will Be Achieved

Full compliance will be achieved with the approval of the revision to Procedure PAP-0204 which is expected to occur by July 1, 1985. The actions being taken to improve the appearance of the plant are included in this response to document the Cleveland Electric Illuminating Company's recognition of the importance of housekeeping.