



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

MAY 20 1985

Docket Nos.: 50-440  
and 50-441

Mr. Murray R. Edelman, Vice President  
Nuclear Operations Group  
The Cleveland Electric Illuminating Company  
P. O. Box 5000  
Cleveland, Ohio 44101

Dear Mr. Edelman:

Subject: Perry Nuclear Power Plant (Units 1 and 2) Conformance with  
Regulatory Guides (FSAR Table 1.8-1 and 1.8-2)

This letter contains the interim results of the staff's review of the information presented in your letter dated April 2, 1985, clarifying and/or modifying the extent to which Perry conforms to Regulatory Guides. Specifically commented on below are the staff's comments relative to Regulatory Guide 1.52, 1.140 and 1.143 which, unless satisfactorily responded to by your staff, could alter the conclusions pertaining to these regulatory guides in Section 11 of the SER and Supplements amending Section 11 of the SER. Changes to the specific system changes related in FSAR Amendment 18, are still under review by the staff and will be commented on separately, as will the staff's comments on Perry's conformance with other regulatory guides clarified in your April 2, 1985 letter.

It is accordingly requested that CEI respond on a priority basis to the following staff comments.

1. While the applicant claims to have conformed to Regulatory Guides 1.52 and 1.140, in reality inspections have shown that silicone sealants have been utilized in both ESF and non-ESF systems. This is contrary to regulatory position C.5.c of these guides and may alter the staff's conclusion stated in the SER.

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2. The Perry FSAR Pages 11.3-2, 11.3-14 and Table 11.3-6 indicated that materials utilized in the gaseous radwaste system were ASME, Section II materials with Table I of Regulatory guide 1.143. The April 2, 1985 letter states that these materials now meet ASTM standards. This cannot be considered appropriate for pressure vessels, atmospheric tanks or heat exchangers without further explanation. This may alter the staff's conclusion expressed in the SER.
3. BTP ETSB-11.3 does not describe how a solid radwaste system is to be fabricated. Perry has a UNI system which has never worked at any plant. All installations where this system has been proposed have resorted to other solidification means, usually portable systems. What is Perry doing? The conclusions in the SER may not be appropriate in view of this change.
4. The SER input for Section 11.2, Liquid Radwaste Treatment System, was based upon the design and construction of all components satisfying or exceeding the intent of Regulatory Guide 1.143. This was noted on Pg. 11-4 of the SER. In the applicant's recent letter, they indicated that these component's materials conformed to ASTM Standards and were constructed to high industry standards. Without further detail the staff would have to conclude that this change does not meet the criteria of the above guide and impact negatively on the conclusion stated in the SER.
5. The exceptions to airflow capacity testing and to air-aerosol mixing testing are not acceptable. These tests should be performed in accordance with ANSI N510 1980 (Regulatory guide 1.52). Otherwise the conclusions expressed in the SER may be negated.

This matter will be considered an SER Confirmatory Issue in the next SER Supplement which must be satisfactorily resolved prior to Unit 1 licensing. If your staff wishes to discuss the above comments with the staff prior to responding, please have them contact the Perry Project Manager, John Stefano, in order that arrangements can be scheduled.

Sincerely,

B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing

cc: See next page

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