

July 19, 1985

Commissioner James K. Asselstine  
1717 H Street NW  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Re Cleveland Electric Illuminating Co. (Perry Nuclear Power  
Plant, Units 1 and 2), Docket Nos. 50-440 and 50-441

Dear Commissioner Asselstine:

On behalf of Ohio Citizens for Responsible Energy ("OCRE") I  
am pleased to submit the following comments on the CEI  
presentation and tour of PNPP of July 17, 1985.

1. CEI's discussion of management neglected to mention the  
effects of the merger of CEI and Toledo Edison, announced in  
late June. News accounts have indicated that a nuclear  
management group will be formed to manage the Perry units and  
Davis-Besse. This raises the question of whether persons  
responsible for the poor management of Davis-Besse will be in  
charge of Perry. The effect of the merger on management has not  
been evaluated by the Staff; I feel this must be evaluated  
before fuel load, as integrity, capability, and competence of  
management is a material factor in licensing, and the new  
company and its nuclear unit (not CEI as was presented to you)  
will be responsible for Perry  
for its 40-year life.

2. CEI mentioned the "successful" emergency planning exercise  
held November 28, 1984. I am unable to understand why NRC and  
FEMA gave this exercise such high marks. According to press  
accounts and information obtained through FOIA, the scenario  
assumed for the exercise was ATWS initiated by a stuck-open SRV,  
assumed to start at 10:17 AM. A site area emergency was  
declared. At 10:23 PM the suppression pool was assumed to boil;  
a general emergency was declared. Seven minutes later the  
containment was assumed to fail and radiation release to begin.  
However, the sirens were not hypothetically sounded until 1:45  
PM, one hour and 15 minutes after the radioactive release began,  
and 3 hours  
and 28 minutes after the severe accident was postulated to  
begin. This clearly fails the 15-minute criterion of Appendix E  
to 10 CFR 50 and NUREG-0654. This was not due to a "mistake" on  
the part of the exercise participants, but was written into the  
exercise script. In fact, had the participants not taken the  
"correct" actions within a few minutes, they would have been  
prompted to do so by persons having knowledge of the script.  
This hardly constitutes assurance that prompt protective  
measures will be taken in an accident.

3. CEI stated that while construction on Perry Unit 2 had been  
discontinued, the Unit 2 diesel generators were being completed

"for redundancy." Apparently this means that the Unit 2 DGs are to be redundant to Unit 1's. However, there is presently no way to connect the Unit 2 DGs to Unit 1 busses, as the Perry FSAR (Section 8.3.1.1.2.13) clearly states that there is no sharing of Class 1E AC power between units. To take credit for the Unit 2 DGs as redundant is clearly an unanalyzed issue, and it is perhaps indicative of an intention to abandon, rather than just postpone, Unit 2.

4. CEI stated the intention to resolve all open issues prior to fuel load. This is belied by their response to an open item from the NRC's Fire Protection audit. The Staff stated in the audit report that the item, concerning the sealing of conduit four inches or less in diameter, must be resolved prior to fuel load. In their response CEI proposed a criterion to meet the intent of the Staff's guidelines and stated that it would be implemented prior to exceeding 5% power operation. Although the Staff found CEI's criterion to be unacceptable, it stated that the item (and others identified in the audit) needed to be resolved before Unit 1 "licensing." I am concerned that these items

may be deferred beyond fuel load, without good cause.

5. CEI stated that no major design problems were identified in the Integrated Design Inspection and that no systems have been found that did not work. One of the problems identified by the IDI (Board Notification 85-02) was the lack of consideration of cable voltage drops. This deficiency has been identified in several other systems subsequent to the IDI. I have attached a report filed by CEI pursuant to 10 CFR 50.55(e) concerning such a deficiency in the RCIC system. Note that no commitment to corrective action is made; rather, there is an explanation that RCIC is not really needed in the control rod drop accident, the event for which it is considered an engineered safety feature. While this may be true, CEI has neglected the fact that RCIC is an important coolant makeup system in a station blackout accident; the deficiency renders RCIC inoperable during a station blackout accident. Changing the FSAR and merely accepting a reduction in plant safety is not the appropriate response to such a deficiency, which can be easily corrected by connecting other cables in parallel with the RCIC conductors.

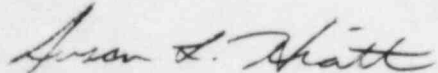
6. You disclosed the Staff's assessment of fuel load readiness for Perry Unit 1, likely to be the first quarter of 1986. This estimate is in reasonable agreement with the August 1984 report of the Caseload Forecast Panel, which found that a late 1985 fuel load is attainable, assuming problem-free preoperational testing. However, in late 1984 the Licensing Board made inquiries of the parties as to the projected fuel load date for scheduling purposes. The Staff then abandoned its Caseload Forecast Panel estimate and endorsed CEI's June 15, 1985

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projected fuel load date. Hearings were scheduled in accordance with CEI's projections. The time constraints and frantic case preparation imposed by the hearing schedule, thanks to the Staff's less-than-honest behavior, were quite difficult for OCRE, a small organization with limited financial and personnel resources; it is possible that an expert witness for one of our issues would have been available had there been a more realistic hearing schedule. In any event the behavior of the Staff in this instance is less than what I consider appropriate for a government agency.

Thank you for the opportunity to participate in your tour of Perry and to provide comments thereupon.

Sincerely,



Susan L. Hiatt  
OCRE Representative  
8275 Munson Rd.  
Menton, OH 44060  
(216) 255-3158

Enclosure: as stated



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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ATTACHMENT

May 22, 1985

PY-CEI/OIE-0046 LQ

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  
Voltage Drop Affecting RCIC  
Valves [RDC 127(85)]

Dear Mr. Keppler:

This letter is the final report pursuant to 10CFR50.55(e) on the potential significant deficiency regarding starting voltage drops in power feeder cables for three valves in the Reactor Core Isolation Cooling (RCIC) System. Mr. J. McCormick-Barger of your office was notified on January 30, 1985, by Mr. T. A. Boss of The Cleveland Electric Illuminating Company that this problem was being evaluated per our Deviation Analysis Report Number 222. Interim reports were submitted on February 28, and April 18, 1985. We have determined that this condition does not constitute a significant deficiency per the requirements of 10CFR50.55(e).

## Description of Potential Deficiency

Calculations had indicated that various DC powered valves within the RCIC system might be incapable of operating due to reduced voltage at the valve operators. This condition results upon loss of a battery charger coupled with the voltage drop in the valves' motor circuit conductors.

## Results of Evaluation

Section 5.4.6.1 of our FSAR currently states that the RCIC system can be utilized to mitigate the consequences of a Control Rod Drop Accident (CRDA). However, in the event that RCIC system

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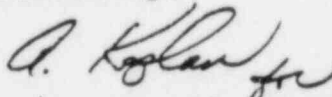
operation becomes impaired due to the loss of a battery charger, the High Pressure Core Spray system would be available to respond. Additionally, the Automatic Depressurization System initiates upon Low Low Reactor Water level, enabling the Low Pressure Core Spray and Low Pressure Core Injection to provide core cooling and reactor inventory make-up.

Discussions with our Nuclear Steam Supply System supplier, General Electric (GE), indicate that they are in agreement with our determination that RCIC is not required to function to mitigate the consequences of a CRDA. Documentation from GE is forthcoming and we will notify you should our position change. The documentation will be evaluated to determine if any changes to our FSAR are required.

In light of the above, the identified condition would not have had a significant impact on the safe operation of the Perry Nuclear Power Plant.

Please call if there are any questions.

Sincerely,



Murray R. Edelman  
Vice President  
Nuclear Group

MRE:sab

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

Mr. D. E. Keating  
USNRC, Site Office

Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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