



John

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

Docket Nos.: 50-440
and 50-441

JUL 05 1985

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: Confirmatory Information Required for Performance of Surveillance
Testing Pertaining to Regulatory Guide 1.118, Rev 2, "Periodic
Testing of Electrical Power and Protection Systems" -- Perry
Nuclear Power Plant (Units 1 and 2)

Your letter dated May 14, 1985 updated the Perry plant's conformance with various regulatory guides revising FSAR Tables 1.8-1 and 1.8-2. In its review of these revised tables the staff noted that the degree of conformance with Regulatory Guide 1.118, Revision 2, "Periodic Testing of Electrical Power and Protection Systems", was found to be inconsistent with the degree of conformance previously documented in the FSAR and accepted by the staff.

The staff has determined that the lifting of leads to perform surveillance testing is not in conformance with the recommendations of Regulatory Guide 1.118 and is, therefore, unacceptable without an ensuing analysis. Further, the staff finds that opening of a fuse and/or breaker to perform a surveillance test would be acceptable only if it satisfies the positions of Regulatory Guide 1.22.

As a confirmatory item, the staff requires that CEI submit a detailed discussion regarding the Perry I&C designs' degree of compliance with Regulatory Guide 1.118. If you plan to utilize the jumpering of wires, the removal of fuses or the opening of breakers, then their use should be correlated with the various positions (6a and 6b) set forth in the aforementioned regulatory guide. The opening of circuit breakers to perform surveillance testing should also be discussed within the context of Regulatory Guide 1.22. For the cases that fall outside the purview of these regulatory guides, your staff should modify the design according to these regulatory guides or provide acceptable justification(s) for deviating from these guidelines.

JUL 05 1985

In addition, your staff should confirm that response time testing as discussed in Regulatory Guide 1.118 is applicable to both the reactor protection system and the engineered safety feature systems, including the sensors where applicable.

Your immediate attention to this matter is urged in view of the on-going testing of, and projected fuel load date for Perry Unit 1.

Sincerely,

ORIGINAL SIGNED BY:

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

cc: See next page

DISTRIBUTION:

Docket File

NRC PDR

Local PDR

PRC System

NSIC

LB#1 R/F

MRushbrook

JStefano

OELD

ACRS (16)

JPartlow

BGrimes

EJordan

RWHouston

FRosa, ICSB/DSI

JMauck, ICSB/DSI

RKnop, Region III

RLanksbury, Region III

JGrobe, SRI/Perry

LB#1/DL
JStefano/mac
07/5/85

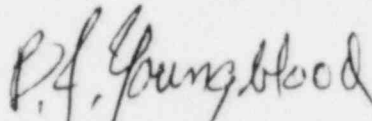
LB#1/DL
BJYoungblood
07/5/85

JUL 05 1985

In addition, your staff should confirm that response time testing as discussed in Regulatory Guide 1.118 is applicable to both the reactor protection system and the engineered safety feature systems, including the sensors where applicable.

Your immediate attention to this matter is urged in view of the on-going testing of, and projected fuel load date for Perry Unit 1.

Sincerely,

A handwritten signature in dark ink, appearing to read "B. J. Youngblood". The signature is written in a cursive, flowing style.

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

cc: See next page

JUL 05 1985

Mr. Murray R. Edelman
The Cleveland Electric
Illuminating Company

Perry Nuclear Power Plant
Units 1 and 2

cc:

Jay Silberg, Esq.
Shaw, Pittman, & Trowbridge
1800 M Street, N. W.
Washington, D. C. 20006

Mr. Larry O. Beck
The Cleveland Electric
Illuminating Company
P. O. Box 97 E-210
Perry, Ohio 44081

Donald H. Hauser, Esq.
The Cleveland Electric
Illuminating Company
P. O. Box 5000
Cleveland, Ohio 44101

Resident Inspector's Office
U. S. Nuclear Regulatory Commission
Parmly at Center Road
Perry, Ohio 44081

Regional Administrator, Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Donald T. Ezzone, Esq.
Assistant Prosecuting Attorney
105 Main Street
Lake County Administration Center
Painesville, Ohio 44077

Ms. Sue Hiatt
OCRE Interim Representative
8275 Munson
Mentor, Ohio 44060

Terry J. Lodge, Esq.
618 N. Michigan Street
Suite 105
Toledo, Ohio 43624

John G. Cardinal, Esq.
Prosecuting Attorney
Ashtabula County Courthouse
Jefferson, Ohio 44047