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September 24, 1985

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U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dr. W. Reed Johnson  
Atomic Safety and Licensing Appeal Board  
U. S. Nuclear Regulatory Commission  
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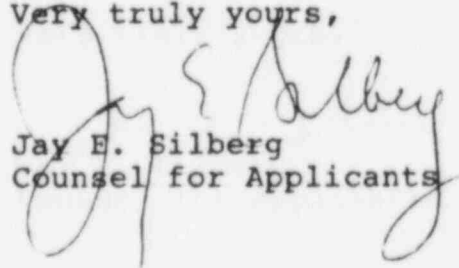
Mr. Howard A. Wilber  
Atomic Safety and Licensing Appeal Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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

Gentlemen:

Enclosed for the Appeal Board's information is a  
September 19, 1985 letter from Cleveland Electric  
Illuminating Company to the NRC Staff setting forth  
the plant status and operational readiness for the  
Perry Nuclear Power Plant, Unit 1.

Very truly yours,

  
Jay E. Silberg  
Counsel for Applicants

JES:L

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
THE CLEVELAND ELECTRIC	)	Docket Nos. 50-440
ILLUMINATING COMPANY, <u>ET AL.</u>	)	50-441
	)	
(Perry Nuclear Power Plant,	)	
Units 1 and 2)	)	

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## THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 - CLEVELAND, OHIO 44101 - TELEPHONE (216) 622-9800 - ILLUMINATING BLDG. 55 PUBLIC SQUARE

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September 19, 1985  
PY-CEI/NRR-0341L

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MURRAY R. EDELMAN  
VICE PRESIDENT  
NUCLEAROFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCHB. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555Perry Nuclear Power Plant  
Docket No. 50-440  
Plant Status and  
Operational Readiness

Dear Mr. Youngblood:

In keeping with our practice of providing monthly updates of our progress, and in preparation for issuance of an Operating License, this letter provides the status of construction and readiness for operation of Unit 1 of the Perry Nuclear Power Plant (PNPP). As summarized in the attachments to this letter, the design, construction, preoperational testing, and licensing activities required for fuel load are substantially complete. Around the end of September, we anticipate filing a letter requesting issuance of the operating license for PNPP Unit 1 within thirty days.

Our position that PNPP Unit 1 will be ready for fuel load is based on the readiness of the operations and project personnel, our management plan to achieve fuel load and full power operation, and the programs to identify and disposition outstanding work items. We intend to provide further details on the status and disposition of specific remaining activities by early October. Our plan ensures that the activities remaining to be completed will not affect safe startup and operation of the plant and thus do not preclude issuance of an operating license and loading of fuel.

We will continue to update your staff to address the plant progress towards the issuance of the Perry Unit 1 Operating License. In summary, following the completion or disposition of the remaining activities identified through the program described herein, CEI and Perry Nuclear Power Plant Unit 1 will be ready to commence loading fuel. If you have any questions concerning this information, please let me know.

Very truly yours,

Murray R. Edelman  
Vice President  
Nuclear Group

MRE:njc

Attachments

cc: Jay Silberg, Esq.  
John Stefano (2)  
C. Norelius  
J. Grobe

PNPP PROJECT STATUS  
AND OPERATIONAL READINESS

Staff Operational Readiness

CEI has, since project inception, maintained full management responsibility for the quality design, construction, startup and operation of the Perry Nuclear Power Plant. The Perry Project is currently staffed with 1013 CEI employees, all located on-site, dedicated full time to the administrative and technical support and operation of the plant. The qualifications and experience of our management team as well as detailed information on our operations staff experience have been documented and provided to the NRC. We have completed the initial training and licensing of our operations staff, and have 34 NRC Licensed Operators, of which 25 are licensed as Senior Reactor Operators. This provides for a full five-shift rotation for operations, with previous BWR experience provided through a combination of our own Shift Technical Advisors and Shift Supervisors. It remains our goal to achieve sufficient staffing to support a six shift rotation.

In addition to substantial training on the on-site Perry specific control room simulator, the PNPP operations staff has been involved in all phases of the project. This includes contributing to original control room design layout, early participation in preoperational testing and currently coordinating all plant testing activities. This active involvement, along with our practice of providing for experience training at other nuclear power plants, assures that our plant personnel are prepared for operating the Perry Nuclear Power Plant.

Preoperational Testing

CEI has implemented several programs to assure that the PNPP preoperational test program meets regulatory requirements and our test commitments. In addition to reviews of the test specifications, and upgrading the test program manual, a senior level, experienced review team was established to evaluate the test procedures. The results of this review to date have identified deficiencies which were corrected prior to the completion of the affected test and approval of test results. Thus, we are confident that completion of the overall test program demonstrates the plant systems will perform their intended function and are ready for operation.

Significant test milestones that have recently been completed include the Containment and Drywell Structural Integrity, the Integrated Leak Rate and Loss of Offsite Power Tests. At this time the overall preoperational testing program is substantially complete, with approximately ten percent of the total system tests remaining to be completed. Several of these tests are under evaluation for completion at milestones beyond fuel load. We do not expect the completion of the required preoperational tests to have an impact on the operating license issuance.

### Design and Construction

The design and construction of the Perry Nuclear Power Plant, Unit 1 is essentially complete. Table 1 shows the completion status of the various bulk construction activities, which results in a physical progress status of 99.3% complete. The remaining bulk work is minimal and will not impact our licensing schedule. All systems have been turned over from construction to test and the building area turnovers to operations are nearing completion. Outstanding work activities are being tracked and completed in accordance with the appropriate completion milestones for the plant operational modes.

With respect to design, CEI is confident in the adequacy and effectiveness of our programs in producing a high quality plant ready for operation. This has been confirmed through a number of major reviews, audits and inspections, initiated by both CEI and the NRC. In addition to CEI's programs for design and construction assurance for PNPP described in our letter dated April 5, 1984, more recently the NRC's Integrated Design Inspection further confirmed the effectiveness of the design control program.

### Licensing Issues:

Atomic Safety and Licensing Board Hearings - CEI has successfully completed the hearing reviews by the Atomic Safety and Licensing Board with the issuance of favorable decisions on the construction quality assurance issue on December 2, 1983, and on the issues of offsite emergency preparedness, hydrogen control and emergency diesel generators on September 3, 1985. With the resolution of the license conditions identified, these decisions enable the operating license to be issued upon completion of the other required staff findings. Thus, there are no issues before ASLB which are expected to have an impact on the schedule for licensing.

Safety Evaluation Report - At this time, all outstanding and confirmatory issues as well as requests for information have been addressed and are under review. We have been working closely with NRR through our Licensing Project Manager and anticipate that all of these items can be resolved in the next supplement to the Safety Evaluation Report (SSER 7). Most of the items are confirmatory in nature and none of the technical issues is expected to have an impact on operating license issuance.

Programmatic Issues - With respect to the programmatic licensing requirements, the major work activities associated with the Equipment Qualification, Emergency Plan, Fire Protection, Human Factors and Security Plan programs have been completed. We have successfully completed implementation audits and inspections held to date in each of these areas and are presently resolving the remaining open items in preparation for follow-up audits required to support fuel load. There is no significant issue related to any of these programs that is expected to impact our licensing schedule.

Technical Specifications - CEI has been working closely with NRR and Region III to resolve all comments related to the draft PNPP technical specifications during the Proof and Review phase. In addition, we have undertaken parallel reviews of the technical specifications, SER and the FSAR, as well as the changes, in preparation for our upcoming certification. We do not anticipate any difficulties and believe the current schedules for issuance of final draft will support our licensing needs.

Inspection and Enforcement - All NRC Region III inspection open items, unresolved items and items of noncompliance are being reviewed to establish appropriate completion milestones for the items. These milestones will be discussed with the NRC Resident Inspector and those items required for fuel load will be addressed to support timely resolution of these items. To date, we have been addressing and resolving a substantial number of open items each month. Followup inspections in certain programmatic areas such as fire protection, security and emergency planning which are scheduled over the next few weeks, are expected to closeout a significant number of additional items.

CEI has evaluated the existing 10CFR50.55(e) potential significant deficiencies and has provided either an interim or final report on each item. None of the open 50.55(e) items is expected to impact fuel load and all can be resolved to support our initial licensing milestones. Similarly, the remaining IE Bulletins, Circulars and Notices have been reviewed and should have no adverse impact on licensing.

## MANAGEMENT PLAN TO ACHIEVE FUEL LOAD AND FULL POWER OPERATION

During the upcoming final weeks prior to fuel load, our efforts are concentrated on completion of remaining construction activities and final preoperational testing and on closure of licensing issues and inspection findings. To focus these efforts, a management plan to achieve fuel load has been instituted to ensure timely completion of the activities necessary to meet plant operability and regulatory requirements. This plan supports our goal of loading fuel and achieving full power operation in a safe and timely manner. We are using this plan as a management tool to assure the completion of the small amount of remaining work so that supports achievement of fuel load, initial criticality and low power testing (up to 5% power) milestones. We are continuing to accomplish additional work on the priority that is established by subsequent operating milestones. Although some work will not have been completed prior to fuel load, implementation of this plan will ensure that all systems (or appropriate portions of systems) and components required for fuel load and subsequent milestones will be operable, and remaining items will be closed or dispositioned.

This plan is founded on a detailed review of the Technical Specifications that was performed to determine the plant safety systems and support systems required to be operable to support the operating milestones. Systems were identified as to whether they are required in the operating modes applicable to fuel loading and hot functional testing under a low power limitation in the operating license. Also identified were subsopes of all systems to support surveillance testing of those safety systems required for fuel loading and low power testing. To support initial low power testing and to provide operational flexibility, additional systems were identified as needing to be in service and operational before one or more of the initial operating milestones are achieved. For the systems identified above, detailed reviews of the status of all activities required to establish operability will be conducted, and reviewed and approved by PORC and NSRC. This process considers completion of construction, testing, design, licensing, systems procedures, programmatic items and configuration control. This will assure required system readiness to support the plant operating conditions.

The small amount of work remaining to be completed after fuel load will have been subjected to a stringent management review and approval process. Such postadditional t-fuel load activities will be defined as to the residual work and written technical justification provided. Considerations such as impacts on operability of required systems and the conduct of the low power testing will be carefully evaluated as an integral part of the approval process. In addition, the ability to complete these activities consistent with the plant operating milestones will be confirmed. Finally, none of the activities under consideration will necessitate a request for an exemption to 10CFR regulations.

In summary, this management plan, provides for an integrated assessment, prioritization and accomplishment of the remaining work activities at PNPP. We intend to describe the results of the plan's implementation and identify and justify any items that remain to be completed beyond fuel load in our next letter, which we will submit about 30 days before fuel load. We will also identify those items and programs previously identified and accepted by NRR to be completed at a milestone beyond fuel load. These are documented in prior correspondence and the Safety Evaluation Report and its supplements.

# NRC STATUS TRACKING

- % COMPLETE -

THROUGH AUGUST 1985

<u>PROGRAM</u>	<u>PERRY #1</u>	<u>PERRY #2</u>
SITE PREPARATION	100.0	100.0
CONTAINMENT-CONCRETE	100.0	94.8
CONTAINMENT-PRE-STRESS	N/A	N/A
CONTAINMENT-STEEL	99.9	95.8
STRUCTURES	99.2	88.8
REACTOR PIPING	100.0	14.2
OTHER PIPING	99.9	19.4
REACTOR PRESSURE VESSEL	100.0	98.8
COMPONENTS	99.9	35.2
ISI/PSI PIPING EXAMINATIONS	98.9 (1)	15.0
PIPE SUPPORTS	100.0	15.8
FUEL RACKS	100.0	0.0
ELECTRICAL-COMPONENTS & SYSTEMS	99.4	27.4
ELECTRICAL-CABLE & TERMINATIONS	99.6	0.0
INSTRUMENTS-COMPONENTS & SYSTEMS	100.0	2.8
INSTRUMENTS-CABLE & TERMINATIONS	99.8	11.6

(1) Decrease from last month is due to additional exams recently identified to meet FSAR requirements.