



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN  
VICE PRESIDENT  
NUCLEAR

July 11, 1985

PY-CEI/OIE 0080 L

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 No. 50-440; 50-441  
Seismic Support Spacing  
Criteria for Tubing Installed  
by Johnson Control Co.  
[RDC 139(85)]

Dear Mr. Keppler:

This letter is an interim report pursuant to 10CFR50.55(e) concerning violations of seismic support spacing criteria for tubing supports in balance of plant areas. On June 11, 1985, Mr. E. Riley of the Cleveland Electric Illuminating Company telephoned Mr. F. Jablonski to report this deficiency which is being evaluated under Deviation Analysis Report 243.

## Description of Deficiency

During the review of the as-built configuration of tubing in the balance of plant areas, violations of the seismic support spacing criteria were identified. The violations resulted from improper applications of the criteria specified in Gilbert Commonwealth, Inc. Specification 90, and Report 1937 which governed the design implementation and installation of the tubing.

## Analysis of Safety Implications

The functional integrity of the instrumentation/control systems cannot be assured without adherence to the seismic support spacing criteria.

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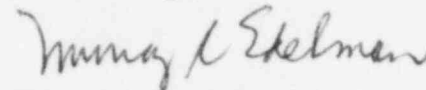
Corrective Action

Engineering Change Notices have been issued to revise and clarify the criteria in Specification 90, and Report 1937 which governed the installation of the balance of plant tubing.

A review is being conducted of all piping, tubing and racks installed by the contractor who was responsible for the installation of the balance of plant tubing. This review utilizes a checklist to ensure that problems with the implementation of the criteria are identified and evaluated. Nonconformance Reports (NRs) are being issued to document each violation of the criteria and these NRs are being evaluated and dispositioned by Engineering.

Another report, either interim or final, will be provided when additional information is available. If you have any questions, please call.

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

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