



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

September 24, 1985
PY-CEI/NRR-0349 L

Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Compliance with TMI Action
Plan Item III.D.1.1

Dear Mr. Youngblood:

In your letter of May 29, 1985, you provided comments to CEI's proposed resolution of TMI Action Plan Item III.D.1.1. The purpose of this letter is to provide our response to those comments.

We have reviewed the Perry Leakage Surveillance and Preventative Maintenance Program with respect to the following systems:

- 1) The emergency service water (ESW) system is an open system which utilizes water from Lake Erie for emergency decay heat removal via the RHR system following a LOCA. This system is isolated from potentially radioactive water, is not subject to contamination following a design basis accident and, therefore, does not come under the scope of NUREG 0737 Item III.D.1.1.
- 2) The Perry Plant scram discharge volume and piping is completely contained inside the containment. As such, this system cannot provide an uncontrolled leakage path to the environment and does not come under the scope of NUREG 0737 Item III.D.1.1.
- 3) The emergency closed cooling system is isolated from potentially radioactive water, is not subject to contamination and, therefore, does not come under the scope of NUREG 0737 Item III.D.1.1.

We have reviewed the heat exchangers associated with aforementioned cooling systems and those systems included in the leakage surveillance program. Heat exchangers located outside the containment that are associated with potentially contaminated systems required by Item III.D.1.1 will be included in the leakage surveillance program. Leakage from the potentially contaminated side of

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Mr. B. J. Youngblood

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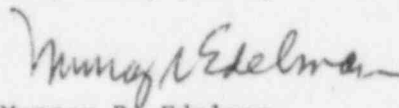
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the heat exchanger will be eliminated to the extent practicable. Leakage not eliminated will be measured and compared to an overall water leakage limit. The HPCS and other room coolers do not provide a potential source of contamination to the environment and, therefore, do not come under the scope of III.D.1.1.

The reactor water cleanup system (RWCU) has been provided with connections to the post accident sampling system to allow for monitoring of cleanup operations. These connections are made to the RWCU inside the containment. Thus, a reactor water level 2 isolation signal to the RWCU isolation valves ensures isolation of this potential leakage path out of the containment. In addition, the isolation valves are leak tested in accordance with the Technical Specifications.

Please feel free to contact me if you have any questions regarding this matter.

Very truly yours,



Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

cc: Jay Silberg, Esq.
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