



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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July 23, 1985

MURRAY R. EDELMAN

VICE PRESIDENT  
NUCLEAR

PY-CEI/OIE 0081 L

Mr. James G. Keppler  
Regional Administrator, Region III  
Office of Inspection and Enforcement  
U.S. Nuclear Regulator Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

RE: Perry Nuclear Power Plant  
Docket Nos. 50-440; 50-441  
Fuel Pool Gates Preoperational  
Test Requirements  
[RDC 111(84)]

Dear Mr. Keppler:

This letter supplements our report pursuant to 10CFR50.55(e) concerning the inclusion of preoperational testing requirements in test specifications initiated by Gilbert/Commonwealth, Inc. for the Perry Nuclear Power Plant (PNPP). This deficiency has been evaluated per Deviation Analysis Report (DAR) 194 and a report of the results of that evaluation was transmitted to your office on February 28, 1985.

Since the submittal of the report on February 28, 1985, The Cleveland Electric Illuminating Company has taken additional action to assure that the PNPP test program meets regulatory requirements and test commitments. Specifically, a Management Procedure Review Team (MPRT), consisting of senior level personnel with extensive testing and design experience, was formed to evaluate test procedures and provide recommendation to the Project Management. As a result of the MPRT evaluation, a Special Project Plan titled "Test Procedure Assurance Review" was issued to implement the recommendations of the team. This Special Project Plan provides a detailed plan to identify and correct any inadequacies in test procedures at PNPP. The key provisions of this plan include the following:

- . A review of all preoperational and selected acceptance test procedures by MPRT.
- . Reinforcement of attention to detail to ensure technical adequacy of the test procedures.
- . Increased supervisory involvement during the evolution and conduct of test procedures and revisions.
- . Additional training of test personnel.

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- . Re-review of licensing commitments.
- . Periodic progress reports and a final summary of findings and actions taken as a result of the Special Project Plan.
- . A Quality Assurance audit of the performance and effectiveness of the Special Project Plan.

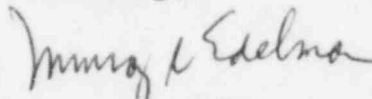
Copies of the MPRT final report and the Special Project Plan have been provided to members of your staff and provisions have been established for their review of the results of these efforts.

Special Project Plan, "Test Procedure Assurance Review", will provide a comprehensive evaluation of test procedure commitment identification and test methodology. This effort will augment the review of Test Specifications performed as a result of DAR 194. The Review of GAI Test Specifications required by DAR 194 has been completed and is available for review.

This is the final report pursuant to 10CFR50.55(e) regarding DAR 194. The periodic progress reports and final summary of the results of the Special Project Plan will be available for review at the PNPP site.

If you have any questions regarding this matter, please call.

Sincerely,



Murray R. Edelman  
Vice President  
Nuclear Group

MRE:sab

cc: J. A. Grobe  
D. E. Keating  
J. Stefano

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