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VICE PRESIDENT  
NUCLEAR

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  
Post 100 Hour Inspections and  
Test of TDI Diesel Generators

Dear Mr. Youngblood:

This letter is intended to clarify our position with respect to the testing and inspection to be performed following our 100 hour (approximate) preoperational testing of the TDI diesel generators. Your letter, dated July 22, 1985, identified several tests/inspections to be performed. These were identified in our February 8, 1985 letter and through subsequent communications with our staff. You also offered several comments to be factored into our inspection program.

We intend to follow the test and inspection program identified in your letter as well as incorporate your comments with two clarifications/exceptions:

1. Comment #1 suggests inspecting the turbocharger with the highest recorded exhaust temperature "during the 100 hour run." We will inspect the turbocharger with the highest recorded exhaust temperature during the longest continuous full load run (24 hours). Several runs (of 24 hours or less each) comprise the "100 hour preoperational testing program."
2. Comment #6 suggests visually inspecting the block tops for cracks where cylinder heads are removed. CEI will be performing inspections of the cylinder heads, intake and exhaust valves, and cylinder blocks in accordance with the final Perry DR/QR Program Report. The inspections requested by the TDI Owners Group do not require removal of the cylinder heads at the "post 100 hour/preoperational testing inspection", unless a problem is discovered while performing other inspections and further analysis is required. For example, the DR/QR specifies that the intake

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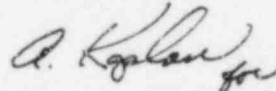
and exhaust valves shall be verified to have proper valve seating by removing the subcover bonnet and checking for soot. Soot buildup would indicate exhaust blowby and therefore require cylinder head removal for further inspection. In this situation, with the heads removed, the cylinder block would also be inspected for cracking.

The final Perry DR/QR Report submitted on March 18, 1985, was based upon the latest Owner's Group recommendations and this accounts for the changes between our February 8, 1984 letter and later communications. The final Perry DR/QR Report also includes many recommendations for modification of existing equipment. CEI is presently reviewing each modification recommendation and will install those which will enhance the quality and/or reliability of the Perry engines. All recommendations not adopted following this first review will undergo additional analysis prior to installation or final rejection. CEI will notify NRC for concurrence prior to eliminating or altering any TDI Owners Group recommendation. All modifications will be completed or reconciled prior to startup from the first refueling outage.

Our intent is to continue evaluating any further Owner's Group recommendations as they are developed. We will inform you if any such recommendations modify our plans regarding the post 100 hour inspection program.

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

Very truly yours,



Murray R. Edelman  
Vice President  
Nuclear Group

MRE:njc

cc: Jay Silberg, Esq.  
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