



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN  
VICE PRESIDENT  
NUCLEAR

August 8, 1985

PY-CEI/OIE 0093 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 Nos. 50-440; 50-441  
Divisional Separation  
Requirements for the Neutron  
Monitoring System [RDC 143(85)]

Dear Mr. Keppler:

This letter is an interim report pursuant to 10CFR50.55(e) concerning divisional separation requirements for the Neutron Monitoring (C51) System. This item was reported by telephone to Mr. J. McCormick-Barger of your office on July 10, 1985, by Mr. E. Riley of The Cleveland Electric Illuminating Company (CEI). This item is being evaluated per Deviation Analysis Report No. 248.

## Description of Potential Deficiency

The power supply to the Neutron Monitoring (C51) System was changed to the Anticipated Transient Without Scram, Uninterruptable Power Supply (ATWS UPS) using 120V AC vital inverters (R14 Systems). Since the C51 System has four divisions, R14 was split into four divisions. A note was added to the elementary diagram (B-208-038, sh. B01) to maintain separation from the Reactor Protection System (RPS) cables. In some instances this requirement was not carried through to the wire list or in the field. Also, there was no requirement to maintain separation for ATWS UPS power from Engineered Safety Features (ESF) divisional power. Because of this, Division 3 ATWS UPS (fed from ESF, Division 1) cables are routed with ESF Division 3 cables. This could be a violation of the Divisional Separation Requirements of Regulatory Guide 1.75.

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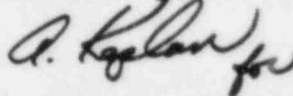
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Status of Evaluation

General Electric is currently evaluating this potential deficiency. We will file our next report upon receipt of this evaluation. If you have any questions, please call.

Sincerely,



Murray R. Edelman  
Vice President  
Nuclear Group

cc: J. A. Grobe  
USNRC Site Office SBB50

D. E. Keating  
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