



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

August 8, 1985
PY-CEI/OIE-0088 L

Mr. C. J. Paperiello
Division of Reactor Safety, Region III
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
50-440/85029 Noncompliance Response

Dear Mr. Paperiello:

This letter is to acknowledge receipt of Inspection Report 50-440/85029 attached to your letter dated July 12, 1985. This report identifies areas examined by Messrs. D. E. Hills, G. F. O'Dwyer and R. D. Lanksbury during their inspection conducted May 11 through June 21, 1985 at the Perry Nuclear Power Plant.

Attached to this letter is our response to the Notice of Violation dated July 12, 1985. This response is in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations.

Our response has been submitted to you within thirty days of the date of the Notice of Violation as you requested. If there are additional questions, please do not hesitate to call.

Very truly yours,

Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

Attachment

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PDR ADOCK 05000440
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Mr. C. J. Paperiello

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cc: Mr. J. A. Grobe
USNRC Site, SBB50

Mr. D. E. Keating
USNRC Site, SBB50

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Mr. R. F. Warnick, Chief
Reactor Projects Branch 1
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

RESPONSE TO VIOLATION
440/85-029-01

Statement of Noncompliance

10 CFR, Appendix B, Criterion V, as implemented through the licensee's Corporate Nuclear Quality Assurance Program (CNQAP), Section 0500, requires that activities affecting quality be performed in accordance with written instructions. Test Program Instruction (TPI)-7 requires that at the end of every preoperational, acceptance, and special test a statement for system restoration be included.

Contrary to the above, Preoperational Test Procedure TP 1M15-P-001, "Annulus Exhaust Gas Treatment (AEGT) System", Revision 1, did not include any instructions for system restoration at the end of the test (Section 6 of the test procedure).

This is a Severity Level V violation (Supplement II).

Corrective Action Taken and Results Achieved

Prior to being released for testing, Section 6 of (TP) 1M15-P-001, "Annulus Exhaust Gas Treatment System", was revised to specify the requirement for system restoration following the performance of the test. Although TP 1M15-P-001 did not contain the required restoration statement at the end of Section 6, the Management Procedure Review Team review of this procedure indicated that the procedure contained sufficient controls to ensure that the system was left in an acceptable configuration at the end of the test.

Testing procedures in progress were reviewed to ensure that Section 6 of these procedures specified the requirement for system restoration following the test and were found satisfactory.

Correction Action Taken to Avoid Further Noncompliance

The requirements for system restoration following the performance of a test were reviewed in the System Test Engineer's weekly training session. During this training, the test Engineers were directed to ensure that procedures being developed include this requirement.

Date When Full Compliance Will be Achieved

Full compliance has been achieved.