



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 - CLEVELAND, OHIO 44101 - TELEPHONE (216) 622-9800 - ILLUMINATING BLDG. - 55 PUBLIC SQUARE

*Serving The Best Location in the Nation*

MURRAY R. EDELMAN  
VICE PRESIDENT  
NUCLEAR

December 5, 1985  
PY-CEI/NRR-0408 L

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Perry Nuclear Power Plant  
Docket No. 50-440  
Request for Operating License

Dear Mr. Denton:

The purpose of this is to advise you that the Cleveland Electric Illuminating Company requests issuance of the operating license on December 19, 1985 for the Perry Nuclear Power Plant Unit No. 1. The design, construction and testing of the Perry Nuclear Power Plant Unit No. 1 has been substantially completed in accordance with the Final Safety Analysis Report as amended and other supporting licensing documents. As previously identified to you, there are a limited number of items that will not be completed prior to fuel load which do not preclude an operating license. These items were described and justified in CEI letters dated October 11, 1985, November 11, 1985, and November 20, 1985.

We have established several management initiatives to assure our readiness for an operating license. These initiatives were described in detail in our letters to the NRC dated September 19, 1985 and October 11, 1985. Several of these initiatives were also recognized by the NRC staff in our recent SALP report. In addition to our earlier efforts in design and FSAR verification programs, more recent initiatives include the management plan to achieve fuel load and the operations manual verification review. The management plan has identified and evaluated the systems or portions of systems necessary to support fuel load. Any items not completed are reviewed to determine whether they cause an adverse impact on the ability of a system or component to perform its intended function. The operations manual verification review identified operations commitments and ensured that they were incorporated into appropriate procedures.

The operations manual is essentially complete and approved. Final approval of the few remaining procedures will be completed next week. All but one of the preoperational test results are approved or in the results approval cycle and remaining test exceptions are being closed out. Specific test deferrals have been identified separately to you. Accelerated efforts have reduced the number of open inspection & enforcement items requiring CEI action to less than 20. Existing efforts continue to ensure timely completion of all open items required for fuel load.

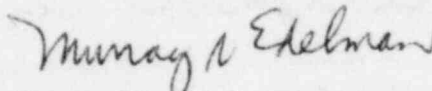
8512060048 851205  
PDR ADCK 05000440  
A PDR

3001  
1/0

The Nuclear Safety Review Committee (NSRC) has performed a comprehensive and detailed review of the readiness of the Perry Nuclear Power Plant for fuel load. NSRC has concluded that all of the items reviewed were either ready for fuel load or that existing management controls are adequate to ensure completion of the remaining activities or development of an adequate basis for deferral of any item. In addition the items previously identified to the NRC for post fuel load completion have been reviewed with the NSRC. Prior to fuel load, NSRC will confirm that the activities remaining to be completed after initial core load will not affect the plant readiness for loading fuel, and that the incomplete status will not affect safe operation of the plant nor affect the health and safety of the public.

Taken collectively, the management initiatives and project activities undertaken over the course of the Perry Project to date enable us to conclude that the plant, procedures and personnel are ready to support fuel load. We therefore request that the operating license be granted for the Perry Nuclear Power Plant Unit No. 1.

Very truly yours,



Murray R. Edelman  
Vice President  
Nuclear Group

MRE:njc

cc: Jay Silberg, Esq.  
John Stefano (2)  
J. Grobe  
J. G. Keppler, Region III  
C. Norelius, Region III  
R. Warnick, Region III  
R. Knop, Region III

D. Eisenhut  
R. Bernero  
W. D. Houston  
W. Butler