



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

December 11, 1985

PY-CEI/OIE 0152 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
Possible Malfunctions of
Ruskin Supplied Fire Dampers
[RDC 125(85)]

Dear Mr. Keppler:

This letter serves as the final report pursuant to 10CFR50.55(e) on the potential deficiencies associated with Ruskin supplied fire damper closure under normal air flow. Mr. J. McCormick-Barger of your office was first notified on January 29, 1985, by Mr. R. G. Solt of The Cleveland Electric Illuminating Company (CEI) that this problem was being evaluated per Deviation Analysis Report 221. Our first and second interim reports were filed February 27, 1985, and April 30, 1985, respectively.

Description of Deficiency

In mid-January 1985, CEI was advised by its contractor, Robert Irsay Co., of a 10CFR21 report filed by their supplier Ruskin concerning possible closure problems of Model #IBD-23 fire dampers supplied for use at the Perry Nuclear Power Plant (PNPP). The 10CFR21 Report states that Ruskin had performed tests which did not provide assurance that the dampers installed inside ductwork would close under air flow conditions.

Analysis of Safety Implication

The potential of certain dampers to close improperly and thus fail to provide a three (3) hour fire barrier could impact the ability of safe shutdown equipment to perform its designated function and would represent a violation of 10CFR50 Appendix R. For this reason the problem is considered reportable.

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Corrective Action

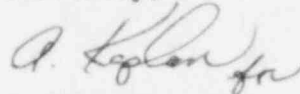
Of the 482 dampers supplied by Ruskin to PNPP, 338 were installed in common facilities, and 72 each in Units 1 and 2. Relative to the operation of Unit 1, modifications affecting 173 dampers were required for compliance with 10CFR50 Appendix R. The dampers/systems were modified according to the criteria recommended by Ruskin and statically tested per the PNPP Fire Protection Program. In addition, a dynamic test was performed for the worst case air velocity for each damper type/configuration to demonstrate closure under air flow.

All work involving the modification and testing of these 173 fire dampers required for compliance with Appendix R will be complete by December 13, 1985.

All work involving the modification and testing of dampers located in non-Appendix R barriers will also be completed by December 13, 1985. Therefore our request for deferral of non-Appendix R damper modifications identified in our October 11, 1985, letter PY-CEI/NRR-0374L is hereby withdrawn.

Unit 2 completion will be consistent with the Unit 2 construction schedule.

Sincerely,



Murray R. Edelman
Vice President
Nuclear Group

MRE:sab

cc: J. A. Grobe
USNRC Site Office

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