



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

June 27, 1985
PY-CEI/NRR-0280 L

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
Regulatory Guide
Conformance Clarification

Dear Mr. Youngblood:

This letter provides revised statements of conformance to five of the regulatory guides listed in FSAR Tables 1.8-1 and 1.8-2 in response to recent discussions and correspondence with your staff. In all five cases, we are either strengthening our present commitment or restating our present commitment to be clearer. A summary of these five revisions follows:

1. R. G. 1.39 - The present clarification is being deleted. We are committing to the 5-zone concept expressed in the regulatory guide as described in letter PY-CEI/OIE-0070L, dated June 21, 1985.
2. R. G. 1.68.2 - Based upon our response to safety review question 640.62 in letter PY-CEI/NRR-0207L, dated April 29, 1985, we are withdrawing our exception to position C.3 of this regulatory guide. This change satisfies NRC's request for clarification (Conformance to R.G. 1.68.2) dated June 24, 1985.
3. R.G. 1.108 - We are further clarifying our exception to testing the Division I and II diesel generators as agreed in letter PY-CEI/NRR-0277L dated June 25, 1985.
4. R. G. 1.123 - Based upon our response to SER Confirmatory Issue 59 in letter PY-CEI/NRR-0208L dated April 29, 1985, we are clarifying our position with respect to this regulatory guide.
5. R. G. 1.143 - Based upon our response in letter PY-CEI/NRR-0267L, dated June 18, 1985, concerning R.G. 1.143, we are modifying Table 1.8-1 to reflect the use of a mobile radwaste solidification system at Perry.

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Mr. B. J. Youngblood

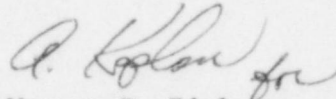
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Our proposed changes are attached. These changes supercede the statements of conformance related to these five regulatory guides in Tables 1.8-1 and 1.8-2, transmitted in letters PY-CEI/NRR-0222L dated April 2, 1985 and PY-CEI/NRR-0248L dated May 14, 1985. They will be incorporated, along with changes expressed in the April 2, 1985 and May 14, 1985 letters, into a future amendment to the FSAR.

We will continue to notify the Staff and update our conformance to the regulatory guides in the FSAR as changes, exceptions and alternate methods are determined to be necessary. Please feel free to contact me if you have any questions concerning this matter.

Very truly yours,



Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

Attachments

cc: Jay Silberg, Esq.
John Stefano (2)
J. Grobe

TABLE 1.8-2

<u>Regulatory Guide (Rev.; RRRRC Category)</u>	<u>Degree of Compliance</u>	<u>Reference</u>
<u>1.39 - Revision 2 - 9/77; RRRRC Cat. 1)</u> Housekeeping requirements for water-cooled nuclear power plants.	PNPP complies with this guide.	17.2 12.5.3

TABLE 1.8-2

<u>Regulatory Guide (Rev.; RRRC Category)</u>	<u>Degree of Compliance</u>	<u>Reference</u>
<u>1.68.1 - (Revision 1 - 1/77; RRRC Cat. 1)</u>		
Preoperational and initial startup testing of feedwater and condensate systems for boiling water reactor power plants.	PNPP conforms to this guide with the exception of commitments to Position C.1 - "Preoperational Testing", since both the condensate and feedwater systems are classified as nonsafety for testability purposes.	14.0
<u>1.68.2 - (Revision 1 - 7/78; RRRC Cat. 1)</u>		
Initial startup test program to demonstrate remote shutdown capability for water-cooled nuclear power plants.	PNPP conforms to this guide.	14.0
<u>1.69 - (Revision 0 -12/73; RRRC Cat. 1)</u>		
Concrete radiation shields for nuclear power plants.	PNPP conforms to this guide	3.8 12.3.2

TABLE 1.8-1 (Continued)

Regulatory Guide (Rev.:RRRC Cat. 2)Degree of ConformanceReference1.108 - (Revision 1 - 8/77;RRRC Cat. 2)

Periodic testing of diesel generator units as onsite electric power systems at nuclear power plants.

The guidelines presented in Regulatory Guide 1.108 are used in establishing preoperational and periodic test procedures for the standby (Division I and II) and HPCS (Division III) diesel generators, with the exception that "first-out" annunciation was not used. The basis for this is the use of individual trip alarms, which give the operator adequate information for correct actions. Additionally, Technical Specifications and preoperational testing shall provide for testing of the standby diesel generators (Div. I and Div. II) in accordance with applicable sections of this regulatory guide except for Position C.2.a.(3). The standby diesel generator units (Div. I & Div. II) shall demonstrate full load carrying capability for an interval of not less than 24 hours at a load equivalent to the continuous rating of each standby diesel generator. The continuous rating of each standby diesel generator (7000KW) exceeds the maximum accident load (refer to Table 8.3.1). This continuous rating also exceeds the maximum load required for forced shutdown (refer to Table 8.3-1). Since the continuous ratings of the standby diesel generators exceed both the maximum accident load and the load required for forced shutdown, testing continuous ratings is an adequate demonstration of standby diesel generator capability.

1.8
8.1
8.3.1
Tech.
Specs.

TABLE 1.8-2 (Continued)

<u>Regulatory Guide (Rev.;RRRC Category)</u>	<u>Degree of Compliance</u>	<u>Reference</u>
<u>1.116 - (Revision 0 - 5/77;RRRC Cat. 1)</u>		
Quality assurance requirements for installation, inspection and testing of mechanical equipment and systems.	<p>PNPP complies with this guide with the following clarifications to ANSI N45.2.8-1975:</p> <ol style="list-style-type: none"> 1) Section 4.5.1.b Pipe will be flushed to maximum velocity using permanent plant equipment or hydrolaser cleaning. 2) Procedures will define system restoration as required to prevent contamination after cleanliness class is achieved. 3) For operations, Reg. Guide 1.116 will be applied to activities comparable in nature and extent to construction phase activities including the clarifications made above. 	17.2
<u>1.123 - (Revision 1 -7/77)</u>		
Quality assurance requirements for control of procurement of items and services for nuclear power plants.	<p>PNPP complies with this guide with the following clarifications:</p> <p>Section 8.2 of ANSI N45.2.13 provides requirements for the control of nonconformances. Suppliers qualified by CEI as design agents in accordance with Regulatory Guides 1.64 and 1.123 may be permitted under specific contractual provisions to disposition nonconformances "use-as-is" or "repair" on behalf of CEI. All nonconformances dispositioned "use-as-is" or "repair" by suppliers qualified by CEI as design agents on behalf of CEI are required to be submitted to CEI at the time equipment is received on site. If CEI determines that a disposition has been incorrectly made, a non-conformance report is generated on site to document the problem and to effect resolution.</p>	17.2

TABLE 1.8-2 (Continued)

Regulatory Guide (Rev.;RRRC Category)Degree of ComplianceReference1.123 - continued

Section 4 of ANSI N45.2.13-1976 provides requirements for the selection of procurement sources. For "commercial grade items", for which there are no quality assurance program or quality documentation requirements, the requirements of Section 4 need not be adhered to. Procurement documents for "commercial grade items" shall, however, contain requirements specific to the item being procured.

TABLE 1.8-1 (continued)

<u>Regulatory Guide (Rev.; RRRRC Category)</u>	<u>Degree of Conformance</u>	<u>Reference</u>
<u>1.143 - (Revision 1 - 10/79 (continued))</u>	2) Materials in the gaseous radwaste system are supplied to ASTM Standards. 3) A mobile radwaste solidification system will be used at PNPP under contract with an approved vendor.	
<u>1.144 - (Revision 1 - 9/80)</u>		
Auditing of quality assurance programs for nuclear power plants.	See table 1.8-2	17.2
<u>1.145 - (Revision 1 - 8/79)</u>		
Atmospheric dispersion models for potential accident consequence assessments at nuclear power plants	PNPP Project conforms to this guide.	2.3.4 2.3.5
<u>1.146 - Revision 0 - 8/80</u>		
Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants.	See Table 1.8-2	17.2
<u>1.150 - (Revision 1 - 2/83)</u>		
Ultrasonic testing of reactor vessel welds during preservice and inservice examinations.	PNPP conforms to the alternative method presented in Appendix A of the guide.	-