



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 97 ■ PERRY, OHIO 44081 ■ TELEPHONE (216) 259-3737 ■ ADDRESS-10 CENTER ROAD

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PERRY NUCLEAR POWER PLANT

Al Kaplan

VICE PRESIDENT  
NUCLEAR GROUP

February 26, 1988  
PY-CEI/NRR-0814 L

Mr. Frank J. Miraglia  
Associate Director for Projects  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Perry Nuclear Power Plant  
Docket No. 50-440  
Integrated Safety Assessment Program II  
(ISAP II) (Generic Letter 88-02)

Dear Mr. Miraglia:

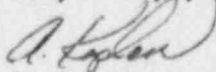
Thank you for the opportunity to participate in the Integrated Safety Assessment Program II (ISAP II) described in your generic letter 88-02. We agree with the stated objectives of ranking licensing and generic issues according to plant-specific safety importance and implementation consistent with each utility's available resources.

However, the ISAP II program is based on performance of a plant-specific Probabilistic Risk Assessment (PRA), and Cleveland Electric has no immediate plans to perform such a PRA. In addition, the existing interactive process for resolving Perry-specific licensing issues has been adequate. Regarding generic issues, Cleveland Electric has actively supported the definition and cost-effective resolution of generic safety issues through industry owner's groups established for that purpose and, more recently, NUMARC. The successful resolution of truly generic issues requires this broad-based consensus.

CEI has therefore decided against ISAP II participation, at the present time, with the full intention of supporting the objectives described in generic letter 88-02 by other means. Our response to this letter's questionnaire is accordingly attached.

Please call if you have any questions.

Very truly yours,

  
Al Kaplan  
Vice President  
Nuclear Group

AK: cab  
Enclosure  
cc: Document Control Desk  
T. Colburn  
K. Connaughton

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Integrated Safety Assessment Program (ISAP) II

Response Format to Generic Letter 88-02

Facility Name: Perry Nuclear Power Plant

Utility: Cleveland Electric Illuminating Company (CEI)

Individual Contact Name: E. M. Buzzelli Phone Number: (216) 259-3737 X-5606

An expression of interest will not be considered a commitment to participate on the part of the utility.

1. Would you be interested in participating in ISAP II? If so, in what time frame?

CEI is not presently interested in participating in ISAP II.

2. Do you believe that an industry/NRC seminar consisting of a brief discussion by NRC followed by a question and answer period would be beneficial prior to making a decision?

CEI would not oppose discussions of additional information at any time.

3. Would you be interested in a one-on-one meeting with the NRC to discuss your particular facility or facilities?

No, our frequent opportunities to meet with the NRC project manager and other staff are considered sufficient to (1) interpret and maintain compliance with our operating license, and (2) address licensing and generic issues via NUMARC and Owners Groups as appropriate.

4. If you remain undecided regarding participation, what additional information do you need in order to make a decision?

5. Do you have any potential concerns about participating in ISAP II?

CEI supports the objective, however, it is not our present intent to perform a plant-specific PRA in order to complete our Individual Plant Examination. Therefore, the benefit of performing a PRA in order to participate in ISAP II is not apparent.

6. Do you have any suggestions for program improvements or changes?

CEI will provide such recommendations through industry organizations established for this purpose: NUMARC and the BWR Owners Group.