

September 10, 1979



Docket No. 50-346

License No. NPF-3

Serial No. 1-92

Mr. A. B. Davis, Chief  
Fuel Facilities and Safety Branch, Region III  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Davis:

Toledo Edison acknowledges receipt of your September 5, 1979 letter and report enclosure 79-16, referencing an apparent item of noncompliance to Davis-Besse Nuclear Power Station Unit No. 1 commitment to the NRC listed as an "Infraction" under the heading of "Notice of Violation".

Following a thorough examination of this item, Toledo Edison herein offers information regarding the item of noncompliance.

Infraction: Technical Specification 6.8.2 requires that procedures, including the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, be reviewed by the SRB and approved by the Station Superintendent prior to implementation. Appendix "A" of Regulatory Guide 1.33 lists the solid radwaste system as an activity which should be covered by written procedures.

Contrary to the above, the procedures for operation of a portable radwaste solidification system, in use on numerous occasions during 1978 and 1979 to date, had not been reviewed by the SRB and approved by the Station Superintendent.

- Response:
1. Regulatory Guide 1.33, Appendix A, Section 7.b(1) specifically lists "spent resins and filter sludge" on "solid waste system". The type of material solidified was evaporator bottoms and the procedure was not reviewed by the SRB. On August 7, 1979, the SRB changed the classification of Procedure SP 1104.28 (Solid Radwaste Disposal) so that it will be reviewed by the SRB.
  2. On September 4, 1979, a major modification to SP 1104.28 was prepared which included the vendor's procedure for solidification received by the Station on August 29, 1979. The revised procedure was submitted to the SRB for review.

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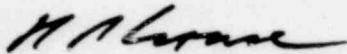
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3. The revised procedure is expected to be reviewed by the SRB and approved by the Station Superintendent by September 28, 1979.

Yours very truly,



Richard P. Crouse  
Vice-President, Energy Supply

TDM/DWB/daw

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