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Docket No. 50-346  
License No. NPF-3

June 29, 1979



LOWELL E. ROE  
Vice President  
Facilities Development  
(419) 259-5242

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

Dear Mr. Denton:

Your letter of June 29, 1979 requested certain information concerning Toledo Edison policies and practices with respect to informing TECo management and the NRC about Davis-Besse Nuclear Power Station Unit 1 operations. Specifically, the letter raises certain questions concerning Toledo Edison handling of Reportable Occurrence 79-062. This involved a discovery on May 21, 1979 of inoperable auxiliary feedwater suction pressure switches and out-of-tolerance pressure setpoints.

The answers to your specific questions are as follows:

1. I was not aware, at the time of the May 23 submittal, of the existence of Reportable Occurrence 79-062.

As clearly stated in the data included in the May 23 submittal, the reliability analysis related to the ability of an auxiliary feedwater pump to deliver water to a steam generator. Reportable Occurrence 79-062 was a component failure that would not have impaired the ability of an auxiliary feedwater pump to deliver water to its steam generator and therefore would not have been included in our analysis no matter when this condition might have been discovered.

It must also be kept in mind that at the time of the calibration check which led to RO 79-062, the status of the station (Mode 5) did not require that the auxiliary feedwater system be operable. Prior to entering an operating mode that would have required the auxiliary feedwater system to be operable, a functional test to prove operability is required.

2. At the time of the June 8 discussion between NRC and TECo personnel at the Davis-Besse Station when the NRC review team inspected and reviewed a number of aspects relating to the Commission's Order of May 16, 1979 and our responses relating to this Order, the Station Superintendent, myself and others at the meeting were not aware of Reportable Occurrence 79-062. In accordance with the normal station procedures as found in AD1807.00 "Control of Conditions Adverse to Quality", the circumstances leading to RO 79-062 were properly documented and evaluated to be a 30 day reportable event. For such a reportable event, there is no requirement or need for the Station Superintendent to have been aware of it on this time frame.

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Mr. Harold R. Denton

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Pressure switch calibration checks were performed on May 21, 1979 by instrument and control mechanics to satisfy the surveillance requirements. The discovery of the deficiencies led to a Deviation Report (DVR) being initiated in accordance with Station Procedure AD1807.00. This DVR was evaluated by the appropriate level station management personnel. The Station Performance Engineer and the Nuclear and Performance Engineer jointly evaluated this event as a 30 day reportable occurrence on May 22.

In accordance with station procedure AD1804.00 "Reports Management Procedure", an engineer in the Instrument and Control group of the Maintenance Section was assigned the responsibility to develop the draft License Event Report (LER). This LER 79-062 was developed and was transmitted to the following persons by Inter Office Memorandum dated June 7 for review and comment:

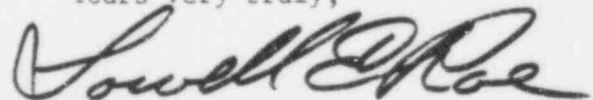
Vice President, Energy Supply  
Vice President, Facilities Development (Chairman CNRB)  
General Superintendent Power Engineering and Construction  
Quality Assurance Director  
Assistant Vice President, Public Relations  
Davis-Besse Station Superintendent  
Chairman Station Review Board (SRB)

Following receipt and incorporation of comments and additional information, a final revised draft was reviewed and approved by the Station Review Board on June 15, 1979.

The formal transmittal of LER 79-062 to NRC Region III Director was made on June 15 with copies to the above named persons and to extensive additional distribution including the Company President.

In summary we have developed and are following established procedures to detect, evaluate and report any condition that is adverse to quality. We feel these procedures were properly followed and that proper evaluation and disposition was made of Reportable Occurrence 79-062.

Yours very truly,



Lowell E. Roe  
Vice President  
Facilities Development

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cc: Edson G. Case, Deputy Director, Office of Nuclear Reactor Regulation

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