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September 14, 1979

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

Serial No. 1-89

Mr. R. F. Heishman, Chief
Reactor Operations and
Nuclear Support Branch, Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Heishman:

Toledo Edison acknowledges receipt of your August 23, 1979 letter and enclosures, Appendix A and Report 79-19, referencing an apparent deviation from Davis-Besse Nuclear Power Station Unit 1 commitments to the NRC listed as an "Infraction" in Appendix A.

Infraction:

1. Criterion V of Appendix B of 10 CFR Part 50 requires that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings." Paragraph 17.2.6 of the FSAR states that "...Procedures have been developed to ensure that...only current...documents are being used." Procedure QAP-2060, "Document Control," requires in Section 7.1.4 that "...changes be incorporated into documents associated with the change in a timely manner."

Contrary to the above:

- a. Drawing M-033 was never revised to reflect the fact that valve DH 100A was either never installed or was removed after installation.
- b. SP 1104.04.9 checklist was never revised to reflect the fact that there was no valve DH 100A.
- c. Drawings E-547 and E-49B, Sheet 25 were never revised to reflect the revised installation per FCR 77-155 on June 21, 1978, of relay TDR-2.

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THE TOLEDO EDISON COMPANY

EDISON PLAZA

300 MADISON AVENUE

TOLEDO, OHIO 43652

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Response:

Facility Change Request 79-278 was prepared on July 10, 1979 to correct the erroneous indication of DH 100A on Drawing M-033. The Facility Change Request is expected to be complete by December 1, 1979.

Temporary Modification T-3961 was prepared on July 6, 1979 to immediately delete DH 100A from Valve Verification List "A" of the "Decay Heat and Low Pressure Injection System Operating Procedure", SP 1104.04. The modification T-3961 was incorporated in the procedure by Revision 13 which was approved on July 24, 1979.

Toledo Edison has taken several steps to prevent any further non-compliance to both (a) and (b) listed in the infraction. On July 7, 1979 the entire HPI System was walked down by the cognizant engineer and an operator as a sample system to determine if the problems with the valve lineups/drawings was extensive. No new deficiencies were discovered. Toledo Edison has initiated a program to walkdown all seismic systems to assure the "as-built" condition is accurately reflected by the isometric drawings, as part of the corrective action to I.E. Inspection Bulletin 79-14. The systems outside of containment are being walked down during power operation with completion of the walkdowns expected by October 15, 1979.

Item "c" of the infraction charges the drawings for FCR 77-155 were never revised to reflect the revised installation. When the change was completed on June 21, 1978, it was noted by Toledo Edison personnel the drawings required a revision. The same day the wiring was incorporated, a note was hung at the cabinet to insure the outdated drawing would not be used. The Facility Change Request package was completed and a letter transmitted to Bechtel Corporation to revise the affected drawings. Bechtel reviewed the drawings and decided a field trip was required to obtain more information. All this was performed prior to the inspection and verified the required drawing change had not been neglected but was simply in the process of being revised.

Revision of the affected drawings is expected to be completed by October 15, 1979.

Infraction:

Technical Specification 6.8.1 requires written procedures to be established, implemented and maintained. Procedure AD 1810.01.1, Section 3.1.1 states in part that "combustible material shall not be stored in areas containing safety related equipment." Switchgear Room B contains breakers which supply safety related equipment.

Contrary to the above:

On July 7, 1979, the inspector observed flammable materials in Switchgear Room B.

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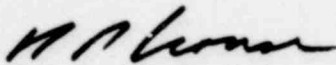
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Response:

The described flammable materials were removed from Switchgear Room B. A fire inspection tour on July 18, 1979 verified the absence of flammable material. The station maintenance foremen were asked to review with all maintenance personnel the requirements of AD 1810.01, "Control of Combustibles and Ignition Sources". A memo to all station personnel was also distributed on September 14, 1979, to request the review of the requirements of AD 1810.01

Yours very truly,



Richard P. Crouse
Vice President, Energy Supply

RPC/SNB/ljk

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