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Subject: Locked Valve Program  
Davis-Besse Nuclear Power Station, Unit 1

Gentlemen:

Toledo Edison has reviewed the current administrative controls being applied under its Locked Valve Program for the Davis-Besse Nuclear Power Station, Unit 1 (DBNPS) from an efficiency and effectiveness standpoint. This review has identified several improvements for implementation of the Locked Valve Program. As described below, these improvements will eliminate unwarranted burdens on the operations staff, and in several cases, potentially detrimental aspects of the present Locked Valve Program. This letter advises the Nuclear Regulatory Commission (NRC) staff of the modification of previous Toledo Edison commitments related to the administrative controls of locked valves at the DBNPS.

Prior to 1989, Toledo Edison had designated a large number of locked valves (approximately 400). Due to this disproportionate number of locked valves, Toledo Edison, in 1989, re-evaluated the criteria used to designate locked valves. Implementation of these new criteria reduced the number of locked valves at the DBNPS. Toledo Edison informed the NRC of these revised criteria by letter dated September 28, 1989 (Serial Number 1636). However, this re-evaluation did not affect the administrative controls applied to designated locked valves.

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The principal elements of the current controls applied to locked valves consist of: 1) maintenance of a locked valve log under the control of the Shift Supervisor, 2) independent verification to assure proper position at the time of locking, 3) monthly verification of position, and, 4) random verification of locked valve positions during periodic plant tours by the Shift Supervisors/Assistant Shift Supervisors. Toledo Edison's commitments to these controls are documented in letters to the NRC dated March 28, 1989 (Serial Number 1-870) and August 9, 1988 (Serial Number 1-795). In addition, Toledo Edison's letter dated May 22, 1979 (Serial Number 507) committed to "performance of a periodic valve position check". This periodic valve position check is implemented via a monthly hands on, physical, verification of valve position.

In some cases, the monthly locked valve position verification involves unlocking the valve to check the position. In other cases sufficient slack is maintained in the chain to allow enough movement of the handwheel to permit a physical check of position without unlocking. In the cases where valves are unlocked to perform the monthly physical position check, there is the potential for a valve being mispositioned during the position check. Additionally, safe access to some locked valves necessitates the construction of scaffolding to perform a monthly physical position check. Toledo Edison believes that the current implementation of the monthly position check exceeds what is intended and reasonable to effect proper control of locked valves.

Several DBNPS Technical Specifications (TS) include surveillance requirements (SR) involving monthly position verification for valves in safety systems. Examples include TS 3/4.7.3, Component Cooling Water System (CCW) and TS 3/4.7.4, Service Water System. These TS require that the respective systems be demonstrated operable "At least once per 31 days by verifying that each valve (manual, power operated or automatic) servicing safety related equipment that is not locked sealed or otherwise secured in position, is in its correct position." These TS, in effect, exempt locked valves from monthly position verifications. These surveillance requirements have been retained in the new Standard Technical Specifications (STS) for Babcock and Wilcox Plants, NUREG-1430, dated September 28, 1992. The new STS include expanded bases for the surveillance requirements which explain the rationale for exempting locked valves from monthly position verification. For example, the bases for the corresponding SR for the CCW system in the new STS state:

"Verifying the correct alignment for manual, power operated, and automatic valves in the CCW flow path provides assurance that the proper flow paths exist for CCW operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since they are verified to be in the correct position prior to locking, sealing, or securing. This SR does not apply to valves which cannot be inadvertently misaligned, such as check valves. This Surveillance does not require any testing or valve manipulation; rather, it involves verification that those valves capable of potentially being mispositioned are in their correct position."

The DBNPS TS and the new STS and associated bases indicate that a monthly verification of locked valve position is not required. The new STS bases also state that valve manipulation (physical position verification) is not required to fulfill the surveillance requirements for any valves, even for valves in safety systems which are not locked, sealed, or otherwise secured. In view of the existing degree of TS requirements for verification of valve positions in safety systems, a reduction in the extent of controls placed on locked valves at the DBNPS is warranted.

Accordingly, Toledo Edison is modifying the implementation of previous commitments relating to the control of locked valves. Control of locked valves at the DBNPS will now consist of the following principal elements: 1) maintenance of a locked valve log under the control of the Shift Supervisor (No change from previous commitments), 2) independent verification to assure proper position at the time of locking (No change from previous commitments), 3) monthly visual verification that locked valves remain locked (Changed from requiring physical verification), and, 4) random visual verification that locked valves remain locked during periodic plant tours by the Shift Supervisors/Assistant Shift Supervisors (No change from previous commitments). All previous commitments regarding periodic position verification of locked valves are superseded by this letter.

Toledo Edison believes that these modifications to the implementation of the Locked Valve Program will reduce the burden on the operations staff while maintaining effective controls on locked valves at the DBNPS.

If you have any questions regarding the DBNPS Locked Valve Program, please contact Mr. Robert W. Schrauder, Manager -Nuclear Licensing, at (419) 249-2366.

Very truly yours,



PWS/dlc

cc: A. B. Davis, Regional Administrator, NRC Region III  
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