

September 2, 1980



Docket #50-346

License #NP-3

Serial No. 1-162

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

Dear Mr. Heishman:

This letter is in response to an Inspection Report No. 50-346-1019
dated 6/16-7/11/80, (Log No. 1-407), as applicable to Duane-Rose
Nuclear Power Station Unit 1. Attached is Toledo Edison's response
to Notice of Violation, items 1, 2, and 3.

Yours very truly,

R. P. Causey

IPC/TUM/DAH/daw
Attachment

cc: WRC D-B Resident Inspector

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RESPONSE TO II INSPECTION REPORT NO. 50-346/80-19

Response to Appendix A. Docket #50-346/80-19 - Notice of Violation

This submittal is pursuant to 10CFR2.201 requiring information concerning:

- 1) Corrective action taken and results achieved
- 2) Corrective steps which will be taken preventing recurrence
- 3) Date when full compliance will be achieved.

Item 1 Technical Specification 6.8.1 requires that written Procedures Recommended in Appendix "A" of Regulatory Guide 1.33, November 1972 shall be implemented.

Appendix "A" of Regulatory Guide 1.33, November 1972, includes Administrative Procedures.

Administrative Procedure AD 1829.02 "Operation and Control of locked valves" requires that when locked valves are repositioned the appropriate log entries are completed in the locked valve log. AF599 and AF608 are locked valves.

Contrary to the above on June 17, 1980 at approximately 7:00 a.m. the inspector determined that valves AF599 and AF608 were in the open position and the locked valve log indicated they were closed.

Discussion: Toledo Edison (TECo) understands the need for the control of safety systems valves which, when repositioned, render a safety system either inoperative or degraded to less than full capability, jeopardizing nuclear safety. To assist in this control, TECo adopted Administrative Procedures which required logging any position changes of safety systems locked valves and also required frequent log reviews by Davis-Besse, Nuclear Power Station (DNBPS) Operations supervisory personnel. TECo defends the procedures and techniques of control as adequate but concedes that circumstances peculiar to the time of this violation did undermine the administrative requirements.

Prior to the violation, DNBPS commenced a containment Integrated Leak Rate Test (ILRT), which required closing many valves including AF 599 and AF 608. All the closed valves were not only logged in the ILRT procedure but also in the DNBPS tagging log and, when applicable, the locked valve log. TECo believes the combined effect of these three listings more than provided for adequate controls to preclude jeopardizing nuclear safety even though the

locked valve log was not up to date when AF500 and AF600 were opened. The actual circumstances that resulted in the locked valve log being deficient are speculative, however, operator interviews suggest that the use of the locked valve log during the series of outage activities that prevailed at the time of the violation was not typical. Normally, a test or operating procedure that requires a locked valve position change generates a log entry, i. e., "log in - actual position change - restoration - log out", with the total time lapse being less than twenty-four (24) hours. In this case, the systems involved in the HRI were restored at various times, dependent on outage activities, throughout a five week period. This, in itself, should not effect logging methods and IITC believes it would not have, given a proportionate time lapse to upgrade the log. In our opinion, the "situation" never became non-conservative. The valves were logged as closed, which is paramount, and subsequent log review would have raised the question of restoration. Also, even had the control provided by the locked valve log totally deteriorate and a nuclear safety system valve was in its unsafe position without being so noted, other station procedures would have caught the discrepancy. Prior to Mode 4, a periodic test is completed which verified, with independent verification, that all nuclear safety system locked valves are locked in their correct position.

Response:

- 1) The locked valve log was upgraded when shift supervisory personnel were informed of the anomaly.
- 2) DNRPS management has reinforced the requirements of the locked valve administrative controls, expressing the importance of close scrutiny of valve/log status.
- 3) IITC believes full compliance is achieved upon issuance of reinforcement mentioned on August 28, 1980.

Item 2

Technical Specification 5.8.1 requires that Procedures covering the Fire Protection Program shall be implemented.

Procedure SI 5016.09 requires that the inspector of fire extinguishers shall sign the inspection tag of the fire extinguisher. The initialed inspection tag signifies compliance with the monthly inspection procedure.

Contrary to the above, on July 6 and 20, 1980 the NRC inspector observed that several fire extinguishers did not have their inspection tags signed for the inspection during the month of June. Several other extinguishers had their inspection tags missing.

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- Response:
- 1) There were five extinguishers which were not in accordance with the requirements of SI 5016.09. The extinguishers were reported to have been checked but the tags left incomplete. These were immediately corrected.
 - 2) The personnel involved with performance of this surveillance test were reinstructed as to the proper method of conducting and documenting the test.
 - 3) Full compliance with the requirement was achieved on July 17, 1980.

Item 3 Technical Specification 4.6.1.2 requires that the containment leak rate shall be demonstrated using the methods and provisions of ANSI N45.4-1972.

ANSI N45-4-1972 requires that a dated log of events and pertinent observations shall be maintained during the test.

Procedure SI 5061.01 "Containment Integrated Leakrate Test," also requires that a continuous sequential log of events occurring during the performance of the test be maintained.

Contrary to the above a log of events was not maintained for the duration of the Containment Leak Rate Test performed on June 9 through June 13, 1980.

Response: Per letter of transmittal, no response is required to this item.