



A Centene Energy Company

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Docket Number 50-346

License Number NPF-3

Serial Number 1823

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United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Subject: H.A.F.A. Instrumented Inspection Technique
Davis-Besse Nuclear Power Station Unit 1

Gentlemen:

By letter dated June 4, 1990, the Nuclear Regulatory Commission (NRC) Staff informed H.A.F.A. International that the Staff considers that the testing conducted by H.A.F.A. International using the instrumented inspection technique (IIT) was invalid, and approval to conduct IIT testing under Topical Report H.A.F.A. 135 (P-A) dated December 1985 was rescinded. The Toledo Edison Company was copied on this correspondence to H.A.F.A. The purpose of this letter is to discuss Toledo Edison's planned activities regarding IIT testing performed at the Davis-Besse Nuclear Power Station (DBNPS) Unit 1, in view of the June 4, 1990 NRC letter to H.A.F.A. International.

Toledo Edison's letters to the NRC dated October 18, 1985, (Serial Number 1199), April 11, 1988 (Serial Number 1486), and September 8, 1988 (Serial Number 1582) requested NRC approval for the use of IIT at Davis-Besse as an alternative to conventional hydrostatic tests required by Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code). The NRC granted approval of these requests by letters dated November 13, 1985 (Log Number 1851) and September 28, 1988 (Log Number 2715). A total of 31 IIT tests were conducted under these approvals.

In response to the recent NRC concerns regarding the validity of IIT, conventional hydrostatic tests covering 12 of the 31 IIT tests have been completed which satisfy the first ten-year interval inservice inspection (ISI) program. In order to alleviate any further NRC concern with the past use of IIT at the DBNPS, Toledo Edison is adjusting the schedule for the second ten-year ISI interval such that conventional hydrostatic tests covering the majority of the remaining IIT tests will be scheduled for completion.

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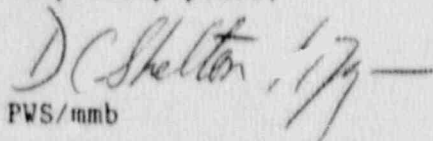
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during the first period of the second ten-year ISI interval with any that remain being scheduled for completion by the end of the first refueling outage in the second period of the second ten-year ISI interval. The second ten-year ISI interval will begin on September 21, 1990, with the first period ending on September 21, 1993.

Because the NRC staff considers past IIT testing conducted by H.A.F.A. to be invalid, Toledo Edison infers that the Staff also considers that the ISI Program requirements have not been satisfied for systems where IIT was used as an approved alternative to ASME Section XI. As it is impractical to perform conventional hydrostatic during the remainder of the first ten-year interval which ends on September 21, 1990, Toledo Edison is preparing relief requests in accordance with 10CFR50.35a(a)(3) and 10CFR50.55a(g)(5)(iv) for systems where conventional hydrostatic tests will not be performed during the first ten-year interval.

Should you have any questions concerning this matter, please contact Mr. R. W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,


PWS/mmb

cc: P. M. Byron, DB-1 NRC Senior Resident Inspector
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