

Docket No. 50-346

License No. NPF-3

Serial No. 1-323

January 31, 1983



RICHARD P. CROUSE
Vice President
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Mr. C. E. Norelius, Director
Division of Engineering & Technical Programs
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Norelius:

On December 10, 1982, Toledo Edison provided a response to your letter of November 3, 1982 (Log No. 1-702) and enclosures, Appendix, Notice of Violation and Report 50-346/82-21. This report referenced five apparent violations on the Davis-Besse Nuclear Power Station, Unit No. 1.

On January 5, 1983, Toledo Edison received a phone call from your Mr. Cordell Williams requesting a clarification of Toledo Edison's response to two of the five items. Following is our response, as per that request:

2b. Violation: Toledo Edison Nuclear Construction Department Procedure (NCDP) 6080.01, Revision 2, states in part, "Whenever an item is separated from its identification, such as... cutting off a piece of cable from a reel, the identification such as a purchase order number...shall be transferred to each marked piece. Material not identified to the purchase order shall not be permitted to be used."

Contrary to the above:

The licensee failed to take corrective action or establish measures to determine whether cables already cut from their reels, and issued under FCR numbers before March, 1982, could be identified or determine what impact this lack of identification could have on safety. The following cables were determined not to have traceability to a unique and specific document attesting to its quality: 2CINCRTMA, 2CINCRTMG, 2LPT4587A, 1LPT4587B, 2LPT4588A, 2LPT4588B, 2CBF1285J, 2CBF1285M, 1CV40608AA, 2LTRC3A6B, 2LTRC3B6B, 2LF4631M, 2LCT4594B, 2LLE4617C, 1LLT4595A, and 1LLT4595C.

This is a Severity Level IV violation (Supplement II).

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Response: Toledo Edison recognized the inherent weaknesses in our cable traceability procedures and, because of that, upgraded the procedures to assure complete traceability in March, 1982. Although the traceability of cables cut and issued prior to March, 1982, is difficult, there is sufficient traceability to assure appropriate quality. Therefore, Toledo Edison does not feel any corrective action is required.

3.Violation: 10 CFR 50, Appendix B, Criterion III, states in part, "Measures shall be established to assure that applicable regulatory requirements and the design basis...for those structures, systems and components to which this appendix applies are correctly translated into specifications... and instructions. These measures shall include provisions to assure that appropriate standards are specified and included in design documents and that deviations from such standards are controlled."

Contrary to the above:

The licensee failed to implement measures to assure that applicable regulatory and design basis requirements were specified and that deviations from such standards were documented and controlled for certain Post-Three-Mile Island (TMI) modifications.

Removal of the seismic specifications from the procurement documents for FCR's 79-409, 79-425, and 79-430 were not accomplished in accordance with documented and approved procedures or instructions. Consequently, failure to document the design changes resulted in QA inspectors approving the instrumentation without the seismic qualifications, as required by NUREG-0737. The licensee failed to control design changes for the following instrumentation:

- a. Containment Wide Range Water Level Indication (FCR-79-409).
- b. Containment Wide Range Pressure Indication (FCR-79-425).
- c. Safety Grade AFW Flow Indication (FCR-79-430).

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Response: (1) Corrective action taken and results achieved.

This situation was reported to Toledo Edison's Quality Assurance Department by NCR 82-464, thus documenting the lack of seismic specifications. Since there are no manufacturers who presently furnish seismically qualified instruments of the type required to meet Toledo Edison's commitment, an engineering evaluation was performed allowing the interim use of the instruments pending the completion of the manufacturers seismic qualification program. When seismic qualification documentation is received from the manufacturer, NCR 82-464 will be closed out.

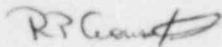
(2) Corrective action taken to avoid further non-compliance.

Supplier deviations, which are required for acceptance of an order, but which must be resolved prior to equipment/material operation, will be tracked using Toledo Edison's Supplier Deviation Report System. Appropriate procedures will be revised to address this situation.

(3) Date when full compliance will be achieved.

Procedure revisions will be accomplished prior to March 4, 1983.

Very truly yours,



RPC:RFP:nlf

cc: DB-1 NRC Resident Inspector