



Docket No. 50-346

License No. NPF-3

Serial No. 1-308

December 10, 1982

RICHARD P. CROUSE
Vice President
Nuclear
(419) 259-5221

Mr. C. E. Norelius, Director
Division of Engineering and
Technical Programs
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Norelius:

Toledo Edison acknowledges receipt of your November 3, 1982 letter (Log No. 1-702) and enclosures, Appendix, Notice of Violation and Report 50-346/82-21 referencing five (5) apparent violations on the Davis-Besse Nuclear Power Station Unit No. 1.

Following an examination of the items of concern, Toledo Edison herein offers information regarding these items.

1. Violation: Technical Specification 6.8.1 requires that written procedures stated in Appendix "A" of Regulatory Guide 1.33, November 1972 shall be established, implemented and maintained.
- a. Toledo Edison Maintenance Procedure 1410.34, Section 6.1.1, states in part, "hangers and supports shall be seismic class 1 type as specified in standard E-302A."

Contrary to the above:

- (1) The inspector observed that safety related conduit No. 3808C, which connects to transmitter LIT 4618, was supported from a non-class 1E hanger with other non-safety pipes and ducts.
- (2) Support and mounting hardware for the class 1E conduit identified above in (1), was not in accordance with Bechtel Standard E-302A. In addition, no drawing or instructions had specifically allowed the observed configuration.

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

The hanger in question was seismically installed, reviewed and accepted by QC on September 15, 1981. This was reconfirmed as acceptable by QC via signoff of a Post-Inspection Construction Authorization on April 30, 1982. The noted deficiency was walked down based on the Maintenance Work Order which originally installed the conduit and was verified by QC on August 6, 1982. This verification assured the adequacy of the non-documented modification to meet the E-302A standard.

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

After a review of training of craft supervisors (including craft foremen) it was determined that adequate emphasis is placed on the need to do work only as outlined in the scope of the work package. It appears the deficiency noted above was an isolated instance and continued emphasis will be maintained in training.

(3) The date when full compliance is achieved.

The deficiency was verified as being corrected by QC on August 6, 1982. Current training has been determined acceptable to prevent reoccurrence.

b. Toledo Edison Maintenance Procedure 1410.23.1, Installation Procedure for Pulling of Essential Cable, Section 6.3.8, states in part, "...cables shall not be left coiled unprotected on the floor."

Contrary to the above:

During the week of July 12-16, 1982, four class 1E cables were observed to be lying on the cable spreading room floor without proper support or protection to prevent damage to the partially pulled cables. In addition, on July 14, 1982, coiled cable in the control room was not properly supported at the end of the work activities for that day.

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

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

Additional indoctrination of the existing procedural requirements (MP 1410.23.1) has been conducted with

the appropriate craft and supervisory personnel. Also, a "cable stand" has been developed to be used whenever necessary to support the cable without risk of damage. All cable installed is meggered and checked for continuity prior to termination. No damage or problem was found when these cables were tested.

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

The existing procedures were determined to adequately address the area of concern. The above mentioned indoctrination and "cable stand" development will ensure proper actions per existing procedures.

- (3) The date when full compliance is achieved.

The indoctrination was completed and the "cable stand" was ready for use by July 29, 1982.

2. Violation: 10 CFR, Appendix B, Criterion XVI, states in part, "Measures shall be established to assure that conditions adverse to quality, such as... deficiencies, deviations ...and nonconformances are promptly identified and corrected."

Toledo Edison Nuclear Quality Assurance Procedure 2160, Revision 9, states in part, "Toledo Edison, its agents ...are responsible for implementing corrective action procedures which require that conditions adverse to quality be identified, reviewed and promptly corrected."

Contrary to the above:

The licensee failed to document an item of noncompliance regarding adverse conditions caused by supporting class 1E conduit 38080C from a non-seismic hanger. This item had been previously identified by the inspector and brought to the attention of the licensee. However, corrective action was subsequently, not accomplished in accordance with written procedures. The following violations of the above requirements were determined.

- (1) Conduit 38080C had been properly installed. However, it was apparently reworked without benefit of quality documentation.

- (2) After the inspector identified the circumstances outlined in (1) above, the licensee took corrective action. However, the restoration of conduit 38080C to its proper hanger 13514-4025E, was not accomplished in accordance with documented and approved procedures or instructions.

Response:

- (1) Corrective action taken and the results achieved.

Craft personnel have instructions to follow only approved procedures which training programs emphasize. A QC walkdown was performed based on the Maintenance Work Order which originally installed the conduit and was completed on August 6, 1982. No deficiencies were identified.

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

After a review of the training of craft supervisors, including craft foremen, it was determined that adequate emphasis is placed on the need to do work only as outlined in the scope of the work package. It appears the deficiency identified above was an isolated instance and continued emphasis will be maintained in training.

- (3) The date when full compliance is achieved.

The deficiency was verified as being corrected by QC on August 6, 1982.

- b. 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).

Response: The cables listed above all have traceability to a particular Purchase Order which contains the documentation attesting to their quality. The Material Issue Ticket lists the Purchase Order number and identifies where the piece of cable was utilized. Toledo Edison has determined that traceability to a specific reel, although desirable, is not required and that adequate traceability is being maintained.

3. Violation: 10 CFR 50, Appendix P 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).

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

Response: It is Toledo Edison's position that the removal of the seismic specifications was an appropriate action. The specifications were removed after the cognizant engineer determined that instrumentation meeting the NUREG-0737 criteria could not be procured. The cognizant engineer was aware that a utility group had been formed to cooperate on a seismic qualification program for the instruments in question and that a report was due at a date later than one consistent with Toledo Edison's schedule. The installation was necessary prior to receipt of seismic qualification in order to meet NRC commitments. Therefore, the specification deviation was controlled by the cognizant engineer in an appropriate manner.

4. Violation: 10 CFR, Appendix B, Criterion V, states in part, "Instructions, procedures or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Toledo Edison Nuclear Quality Assurance Procedure 2050, Revision 4, states in part, "Approved written procedures/instructions shall be developed which require that these documents...be complete, current and contain sufficient quantitative (such as dimensions, tolerance...) and qualitative...acceptance criteria as appropriate to verify satisfactory work performance."

Contrary to the above:

A satisfactory qualitative or quantitative criteria for attributes such as slope, etc. were not properly delineated on drawings, procedures or instructions (which are readily accessible to QC inspectors) for verifying instrument line installation. On May 6, 1982, a QC inspector verified that pressure transmitter instruments PT-4587 and PT-4588 were installed in accordance with drawings J-801 sheets 1 and 2 and Field Change Notice (FCN) 2022 but was not aware of slope requirements since the drawings did not include that information.

Furthermore, the licensee had already issued Vendor Drawing Change Notice M329-624-11 to correct drawing discrepancies and FCR 82-416 to correct instrument tubing dimensions, but neither addressed or determined what the proper slope of the line should have been for the instruments.

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

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

A general specification (Bechtel Specification No. 7749-M-329) is used for determining appropriate instrument tubing installation and is used for all such installations. All tubing installations during the 1982 refueling outage have been inspected for slope requirements and found acceptable.

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

A QC checklist for inspection of tubing has been developed. This checklist incorporates the general specification requirements. Appropriate QC personnel have been instructed in the use of this checklist.

(3) The date when full compliance is achieved.

The tubing inspections have been completed and the QC checklist use was instituted on August 31, 1982.

5. Violation: 10 CFR, Appendix B, Criterion X, states in part, "A program for inspection of activities affecting quality shall be executed...to verify conformance with the documented...drawings for accomplishing the activity."

Toledo Edison Nuclear Quality Assurance Procedure 2100, Revision 3, states in part, "This procedure establishes the requirement for inspections performed to verify conformance to the approved written instructions...and drawing for accomplishing the activity being inspected."

Contrary to the above:

Transmitter FT4630 and FT4631 instrument lines were not installed per Bechtel isometric drawing J-904, SH.1, Revision OB, although a Post-Inspection Construction Authorization verifying installation of the transmitters had already been signed off by QC on May 4, 1982.

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

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

Instrument line installation for transmitters FT 4630 and FT 4631 were reinspected by QC on June 24, 1982 and the as-built condition documented. Other instrument line installations which had been previously inspected during the 1982 refueling outage

Docket No. 50-346
License No. NPF-3
Serial No. 1-308
December 10, 1982
Page 8

were also reinspected and the as-built condition documented.

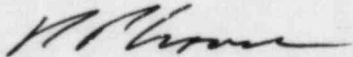
- (2) Corrective action to be taken to avoid further non-compliance.

A QC checklist for inspection of tubing has been developed. Appropriate QC personnel have been instructed in the use of this checklist.

- (3) The date when full compliance is achieved.

The tubing inspections have been completed and the QC checklist use was instituted on August 31, 1982.

Very truly yours,



RPC:LDY:lah

cc: DB-1 NRC Resident Inspector