

Docket No. 50-346

License No. NPF-3

Serial No. 1-283

July 30, 1982



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

Mr. J. A. Hind, Director  
Division of Emergency Preparedness  
and Operational Support  
United States Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Hind:

As indicated in your letter of June 25, 1982 (Log No. 1-643) and again at our July 13, 1982 meeting to review the "Systematic Assessment of Licensee Performance" (SALP) Report for Davis-Besse Unit No. 1, Toledo Edison has the opportunity to provide written comments concerning the evaluation of the Davis-Besse Nuclear Power Station as contained in the SALP report. The following comments as determined in our meeting of July 13, 1982 are submitted in response to the subject report.

Toledo Edison acknowledges the SALP report as an essentially historical document summarizing operational events that occurred during the period of the report. Toledo Edison feels the SALP process has improved tremendously from the first report, and that the NRC is to be complimented. Toledo Edison appreciates the NRC's efforts to point out our areas of strength as well as those areas needing additional improvement. As indicated in the report, Toledo Edison will strive to continue to be very responsive to NRC concerns, and will make every effort to incorporate into our weaker areas the same positive, aggressive management that typifies our Radiological Controls and Emergency Preparedness areas.

Toledo Edison only takes exception to the NRC's conclusions in one area and other comments provided are for clarification to prevent possible misinterpretation by someone not familiar with the NRC's wording format in the findings. The following comments are submitted:

\* On page 11, second item from the top, the use of these maintenance instructions covers only a small percentage of all of the routine maintenance performed at the Station, and constitutes a small percentage of the various procedures and instruction utilized.

\* On page 12, first paragraph, the five of thirteen unplanned trips caused by personnel errors all occurred in the first one-third of the SALP report period. During the latter part of the report period, we had hundreds of construction workers on-site performing large quantities of pre-outage work and did not experience any unit trips. We feel this was due in part

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to changes made in our management controls, and shows effective corrective action.

\* On page 12, under "Licensee Corrective Action" Toledo Edison acknowledges the NRC's recognition of the positive effect of the corrective actions taken and the additional resources allocated to the maintenance area. Additional changes in our management controls and expanded resources under development by the company should continue to increase the effectiveness of our maintenance program.

\* On page 21, the first paragraph, Toledo Edison received a Category III rating in the area of procurement (material control). We would like to point out that several changes are in the process of being implemented and a program to develop a Materials Management Organization is in progress. QA audit/surveillance activities will be increased in this area, and the Station material control procedure has been modified. The Nuclear Construction Department has instituted changes in their management controls and revised their material control procedures. The Procurement Division will revise procurement procedures and increase the training of personnel responsible for material handling and storage in the Davis-Besse Station warehouse.

\* On page 21, under "Review Committees", Toledo Edison objects to the implication here (Items 1 and 2) that our Review Boards did not review Technical Specification violations. We acknowledge there were a very few violations that were not recognized during the review of certain reports. All known violations have "always" been reviewed and all event reports are now scrutinized with one of the objectives being to identify any possible Technical Specification violations.

\* On page 22, in the area of Environmental Controls, Toledo Edison has a significant technical disagreement with the NRC. In the last paragraph, the NRC concludes that "the lack of quality control over detector efficiency calibrations and a too infrequent recalibration schedule is cause of the recent disagreement". Toledo Edison has since performed a recalibration of its instruments at a cost of several thousand dollars and hundreds of manhours. Every one of the 32 efficiencies was within acceptable limits of agreement with the previous calibration data. Daily performance checks are, and have been performed on the detectors as the means of determining when recalibration would be required. The NRC must recognize that their mobile laboratory utilizes a more efficient detector (by a factor of 2) than that utilized at Davis-Besse. The NRC also utilizes a different counting geometry. Toledo Edison feels it is these variations in analytical technique and equipment which are responsible for the disagreements and not any incorrect calibration of our equipment.

Very truly yours,

*R P Crouse / JPM*

RPC:BJW:lab

cc: DB-1 NRC Resident Inspector