

Docket No. 50-346

License No. NPF-3

Serial No. 1-291

September 7, 1982



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

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

Dear Mr. Norelius:

Toledo Edison acknowledges receipt of your August 16, 1982 letter (Log No. 1-668). This letter requested a revised response to Violation No. 5 as identified in the Appendix to your letter dated April 1, 1982, as well as our schedule for upgrading our Quality Assurance Program to include review and/or audit of plant safety related activities utilizing all applicable regulatory requirements and commitments. Our revised response to Violation No. 5 follows.

Violation: 10CFR50, Appendix B, Criterion XVIII, requires that a comprehensive system of planned and periodic audits be carried out to verify compliance with all aspects of the quality assurance program.

Toledo Edison Company Nuclear Quality Assurance Procedure QAP 2180, "Audits," states in part, "A comprehensive system of planned periodic audits to verify compliance with QA program requirements and to determine QA program effectiveness shall be conducted.... The goals of the audit system are... to provide an objective assessment of compliance with established requirements."

Toledo Edison Company Nuclear Quality Assurance Manual, Volume 1, Section 1.2.8, defines Audit Activity as "Documented QA/QC activities to determine, through investigation, the adequacy of, and adherence to...licensing requirements."

Contrary to the above, the quality assurance audits of the fire protection program performed in June 19-26, 1979 (Audit No. 598), April 21 - May 30, 1980 (Audit No. 666) and March 23-25, 1981 (Audit No. 744), only reviewed the adequacy of implementation of the existing plant procedures. Assessments were not made

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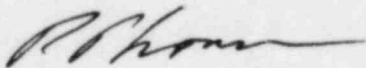
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concerning the adequacy of those procedures utilizing the fire protection licensing requirements as inspection guidance.
This narrow scope for the quality assurance audits permitted deficiencies in fire protection procedures to go undetected.

Response: Contrary to the evaluation made above, Toledo Edison considers its present procedure review and audit program in compliance with the quality assurance program commitments made in Chapter 17.2 of the Davis-Besse Unit #1 FSAR. However, Toledo Edison will upgrade its quality assurance program to include the review of regulatory requirements and commitments into the audit program. Regulatory requirements are interpreted as those plans which receive NRC approval (e.g., Emergency Plan, Security Plan, Fire Hazard Analysis Report, Inservice Inspection Program, etc.) as well as those NRC Regulatory Guide and ANSI Standards committed to in Chapter 17.0 of the Updated Safety Analysis Report.

Toledo Edison will revise its quality assurance program to include the requirement for auditing regulatory requirements prior to January 1, 1983.

Very truly yours,



RPC/CTD

jc d/l

cc: DB-1 NRC Resident Inspector