



Docket No. 50-346

License No. NPF-3

Serial No. 1-305

December 6, 1982

RICHARD P. CROUSE
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(419) 259-5221

Mr. R. L. Spessard, Director
Division of Project and Resident Programs
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Spessard:

Toledo Edison acknowledges receipt of your November 4, 1982 letter (Log 1-703) referencing two violations for the Davis-Besse Nuclear Power Station Unit No. 1.

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

Violation: Technical Specification limiting condition for operations 3.6.3.1 requires containment isolation valves of Table 3.6-2 to be operable. Check valves SA 502, IA 501, NN 58, CV 124 and CV 125 are contained in Table 3.6-2. Operability, in part, is based on meeting the surveillance requirements of the applicable limiting condition for operation and the surveillance requirements of the ASME Code Section XI as delineated in section 4.0.5 of Technical Specifications.

Technical Specification limiting condition for operation 3.0.3 states in part that "In the event a limiting condition for operations and/or associated action requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, the facility shall be placed in at least HOT STANDBY within one hour and in COLD SHUTDOWN within the following thirty hours unless corrective measures are completed that permit operation under the permissible action statements for the specified time interval so measured from initial discovery."

Response: (1) Corrective action taken and results achieved. When it was found on December 15, 1981 that check valves SA 502, IA 501, NN 58, CV 124, and CV 125 had not been tested, the station's understanding was that the failure to perform inservice testing of ASME Code Class 1, 2, and

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3 components would not render the components inoperable or require the invocation of applicable action statements. Since there was no engineering justification to believe the valves would not have performed their function, the decision was made to wait until a scheduled or forced shutdown before testing them. Also, we are currently requesting an ASME Code Request for Relief as part of our new ASME pump and valve testing submittal (per the 1977 Edition thru 1978 Addenda of ASME Section XI) to test these five check valves only during the performance of an Appendix J, Type C Test at refueling. The code request for reliefs were discussed at the new inservice inspection program review meetings held at the site with the NRC on November 19 and 20, 1980 and no open items were found (However, we are currently still under the 1974 Edition thru Summer 1975 addenda of ASME Section XI).

Redundant isolation valves in series with the five check valves were tested on September 21, 1981 and found operable per Surveillance Test, ST 5099.08, "Miscellaneous Valves Quarterly Test." After the start of the refueling outage on March 13, 1982, all five check valves were tested per ST 5061.02, Containment Vessel Local Leak Rate Test. Check valves SA 502 and CV 125 were found to have excessive leakage rates and were replaced. Check valve NN 58 passed the test, but was replaced since it exhibited an increased leakage rate. Valves CV 124 and IA 501 were successfully tested and were not replaced. All five check valves were then successfully tested both per ST 5061.02 and ST 5099.08, Miscellaneous Valves Quarterly Test during the refueling outage.

- (2) Corrective action to be taken to avoid further non-compliance. Following a discussion held between Toledo Edison and Region III-USNRC on October 1, 1982, Special Order No. 99 was distributed to all Station Personnel clarifying the requirements of Technical Specifications. It stated that the failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet operability requirements for a Limiting Condition for Operation. This clarification will ensure future consistency with the NRC interpretation of the operability definition.
- (3) The date when full compliance is achieved. The Station is presently in compliance of testing check valves CV 124, CV 125, NN 58, SA 502, and IA 501 to stated ASME, Section XI inservice testing requirements. Also, steps have already been taken to clarify the requirements of Technical Specifications as they apply to Surveillance

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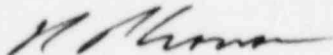
Requirements by submittal of a proposed Technical
Specification change to the NRC.

Violation: Technical Specification 4.3.2.2.1 required the steam feed rupture control system (SFRCS) low steam line pressure instrument channel be channel functional tested on a monthly basis.

Contrary to the above on September 16, 1982, it was determined that Section 6.2 of ST 5013.14 which performs the monthly channel functional test on all the SFRCS low steam line pressure switches had not been performed at its required frequency. The test was last performed on August 5, 1982 and was required to be performed on or before September 12, 1982.

- Response:
- (1) Corrective action taken and the results achieved: Surveillance Test ST 5013.14, Section 6.2 was immediately begun when it was suspected that the ST was beyond its late date. It was satisfactorily completed at 1930 hours on September 16, 1982. Also an emergency Technical Specification change was requested and received at 1520 hours on September 16, 1982 to extend the last date of the surveillance test until 2400 hours on September 16, 1982.
 - (2) Corrective action to be taken to avoid further non-compliance: This event and its implications were discussed with the supervisory personnel concerned. The system for tracking surveillance testing within the I&C Group has been modified to insure that the status of scheduled ST's is reviewed between the shop and the office. This check of ST's should prevent future non-compliance.
 - (3) Date when full compliance will be achieved: The Station was in full compliance when ST 5013.14 was completed on September 16, 1982.

Very truly yours,



RPC/ECC/BJW/bjb

cc: DB-1 NRC Resident Inspector