

Docket No. 50-346

License No. NPF-3

Serial No. 1-334

March 9, 1983



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

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:

Toledo Edison acknowledges receipt of your February 10, 1983 letter (Log 1-737) and enclosures, Appendix, Notice of Violation and report 50-346/82-34 (DPRP) referencing one (1) violation and one (1) item of concern.

Following an examination of the notice of violation, Toledo Edison herein offers information regarding the item of violation.

Violation: Technical Specification 4.2.1 requires that the Axial Power Imbalance be determined to be within limits once per hour when the Axial Power Imbalance alarm is inoperable and the unit is in Mode 1 at greater than 40% power.

Contrary to the above, for more than two months, the Axial Power Imbalance alarm was inoperable and the Axial Power Imbalance was not calculated hourly. Initial calibration of the alarm was not performed until more than two months of operations at greater than 40% power and no method existed for determining operability of the alarm or for alarms covered by Technical Specifications 4.1.2.1.1; 4.1.3.2.1; 4.1.3.3; 4.1.2.6; 4.1.3.9; or 4.2.4.

Response: (1) Corrective action taken and results achieved - Tests were written to check the computer alarms to assure the "alarms package" would recognize an out-of-limit value and cause an alarm in the Control Room. The computer alarms package monitors quadrant power tilt (Tech. Spec. 4.2.4), axial power imbalance (Tech. Spec. 4.2.1), and all control rod positions (Tech. Spec. 4.1.3.6 and 4.1.3.9). All of the computer alarms worked properly except the imbalance limit alarm. It was found the limits in the data were based on percent full power and the calculated imbalance used to compare to the limits was in a decimal fraction of full power. This problem was immediately corrected so no hourly

Docket No. 50-346
License No. NPF-3
Serial No. 1-334
March 9, 1983
Page 2

calculation was required. The test on the imbalance alarm was repeated and the results were acceptable.

The asymmetric rod fault alarm circuitry (Tech. Specs. 4.1.3.1.1; 4.1.3.2.1.; and 4.1.3.3) was tested as part of the control rod drive insertion time test. The alarm functioned properly.

Past operating experience has shown the control rod drive sequence alarms circuitry (Tech. Spec. 4.1.3.6) is functional. The Davis-Besse reactor is run "un-rodded" (i.e., all control rods almost completely withdrawn from the core). Normally, the only time the reactor would be critical with the control rods in the over-lap region would be during zero power physics testing.

- (2) Corrective action to be taken to avoid further noncompliance - A procedure is being written to test the appropriate parts of the computer alarms package any time a limit on tilt, imbalance, or rod insertion is changed. When a limit is changed the associated alarm is to be considered inoperable until the test has been completed. The asymmetric rod fault alarm circuitry test will be incorporated in the control rod exercise monthly test. The zero power physics test will be modified to incorporate a check of the control rod drive sequence alarm circuitry operability.
- (3) The date when full compliance is achieved - The procedure to test the various parts of the alarms package and the control rod exercise monthly test will be modified by April 15, 1983. The zero power physics test will be modified to check sequence alarm circuitry during its review for cycle 4 physics testing.

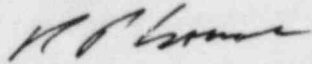
Regarding the item of concern related to safety evaluations, Toledo Edison's response is as follows:

The safety evaluation was written assuming that appropriate testing would be performed to verify the appropriate operability requirements of valve AF-1. The assumed testing was not performed appropriately. This incident points to a general inconsistency in safety evaluation performance and review. We feel this inconsistency is a result of each organization within the Nuclear Mission having its own procedure for performing safety evaluations.

Docket No. 50-346
License No. NPF-3
Serial No. 1-334
March 9, 1983
Page 3

Toledo Edison will, therefore, generate a single procedure for safety evaluations for use throughout the Nuclear Mission. This procedure will contain a provision for adequate review by the Station Review Board and the Company Nuclear Review Board's Safety Evaluation Committee.

Very truly yours,



RPC:DJD:SGW:RFP:nlf
cc: DB-1 NRC Resident Inspector