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Docket Number 50-346

License Number NPF-3

Serial Number 1-1052

October 3, 1994

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, D. C. 20555

Subject: Change in Commitment Related to Item of Noncompliance 84-12-02

Gentlemen:

In a Nuclear Regulatory Commission (NRC) inspection report dated August 14, 1984 (IR 84-12), Toledo Edison was issued a Notice of Violation regarding, in part, the subject item of noncompliance. Item 84-12-02 involved electrical junction boxes which were not maintained in accordance with station drawings and were consequently not adequately protected from an actuation of the fire protection sprinkler system.

Toledo Edison responded to the Notice of Violation by letter dated September 20, 1984 (Serial 1-463). Corrective Actions described in this response included the development of procedure IC 2601.04, Fire Shield and Spray Procedure. Procedure IC 2601.04 was eventually renumbered DB-ME-09805, Spray Shield and Spray Barrier Inspection. Procedure DB-ME-09805 is required to be performed after each refueling outage or after work is performed on equipment subject to the procedure.

Toledo Edison has re-evaluated its position regarding this ongoing commitment and has determined that maintaining DB-ME-09805 is no longer necessary based on the following:

- (1) The amount of modification activity and number of contract employees have significantly decreased since the timeframe in which NRC identified deficiencies in spray shield maintenance at Davis-Besse.

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- (2) \* The information in DB-ME-09805 is strictly a reprint of the information contained in station drawing M-269 which provides adequate guidance for equipment restoration upon completion of maintenance on spray shields.
- (3) Performance monitoring programs, the experience level of individuals performing work on spray shields and increased emphasis on attention to detail provide assurance that spray shields are appropriately maintained as a normal work practice.
- (4) During the last complete performance of DB-ME-09805, approximately 338 spray shields/barriers were inspected. Only two minor deficiencies were identified, neither of which breached the spray shield/barrier.

Based on the above, Toledo Edison intends to cancel DB-ME-09805 and close the associated ongoing commitment in the Toledo Edison Regulatory Management System (TERMS). This issue has been discussed with the Davis-Besse Senior Resident Inspector.

Should you have any questions or require additional information, please contact Mr. William T. O'Connor, Manager - Regulatory Affairs, at (419) 249-2366.

Very truly yours,



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cc: L. L. Gundrum, NRC Project Manager  
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Utility Radiological Safety Board