

April 7, 1983



RICHARD P. CROUSE
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Mr. C. E. Norelius, Director
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Dear Mr. Norelius:

Attached you will find a draft of the Action Program we have prepared to address the NRC concerns, discussed at our March 9, 1983 Enforcement Conference.

Per my telephone conversation of April 5, 1983, we would like to schedule a meeting to discuss these actions, following your review of the proposed Corrective Action Program.

Please have Mr. Peebles contact Mr. Murray regarding the scheduling of the meeting.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'R. P. Crouse'.

RPC:rns
Attachment
cc: Mr. T. D. Murray

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Action Items from Enforcement Conference

I. OPERABILITY

1. Consolidate procedures for safety evaluations and include reviews by the SRB and CNRB for all safety evaluations.
2. Conduct a review of all check valves in our ASME valve program for the following:
 - a. To determine safety function of these valves.
 - b. Based on 2a, review our current testing procedures and determine if any valves should be reverse flow tested.
 - c. To determine the method of testing the valves that require reverse flow test.
3. H.A.F.A. International (Herb Askwith), our consultant on ASME testing, is conducting a similar independent review.
4. Failure on our part to formally test Tech Spec alarms. We have established an appropriate testing schedule.
5. Imbalance alarms. We have agreed to supply the operator, by procedure, with additional information which should improve his ability to evaluate the accuracy of the imbalance alarm.
6. A program to review the FSAR for operability requirements is being incorporated into annual procedure reviews. Presently procedure reviews are including a review of FSAR commitments to include them in procedures.
7. By mid-April, information in the USAR, which includes the original FSAR, NRC correspondence, B&W and Bechtel correspondence, LER's, FCR's, and other information pertinent to station operations will be available in a computerized key-worded format which will simplify the identification of and location of documentation pertinent to a given subject. This should assist station personnel in the review of the USAR and identification of operability requirements.
8. Tech Section personnel are investigating methods by which previous unidentified safety function and operability requirements may be documented in a retrievable format as those requirements are identified.

II. DOCUMENT CONTROL

1. Effective March 1, 1983, a task force was formed and charged with the responsibility of:

Action Items from Enforcement Conference
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- a. Determining the best way to ensure the drawings currently in use reflect current station status.
 - b. Determine how Toledo Edison drawing control and distribution system can be improved.
2. Effective March 7, 1983, the Administrative Coordinator is assigned to monitor and coordinate the progress of the document control program within the station.
3. By December, 1983, we will perform a 100% verification of all drawing indexes to assure their correctness. Personnel required for this effort are being obtained by Nuclear Facility Engineering.
4. We have instructed Bechtel that whenever a drawing has five sheets of paper attached, they should update the drawing. This work is underway and the revision of the P&ID's will be completed by April 1, 1983.
5. A system has been developed for the drawing control clerks to update all controlled drawings at the station. This will be implemented by May 15, 1983.
6. By May 1, 1983, we will have a status of all FCR's at the station.
7. We will status and/or revise our drawings to reflect the as built status of all open accessible FCR's by June 1, 1983.
8. To keep Toledo Edison upper management informed of project status activities, the Drawing Control Task Force Chairman will report to the Mission Vice President monthly beginning April 1, 1983.
9. The Station Administrative Coordinator will issue monthly status reports to the Station Superintendent beginning April 1, 1983.

III. MAINTENANCE CONTROL

1. The Administrative Coordinator has been assigned on a temporary basis to assist the Maintenance Engineer in monitoring administrative activities and establishing new paperwork controls within the department.
2. A Maintenance Specialist has been assigned to coordinate with Quality Assurance, the resolution of audit findings and to monitor progress of the corrective actions.
3. To gain more direct control, an electrical group will be formed in the Maintenance Staff under the direction of a Lead Electrical Support Engineer.

III. MAINTENANCE CONTROL (Continued)

4. The Planning Group will be strengthened by the addition of two more planners and two more data entry clerks.
5. Maintenance has been utilizing the Electrical Foreman as the Electrical Outage Coordinator. We are presently in the process of promoting him to a permanent staff position and promoting a senior electrical maintenance person to the foreman's position to provide a permanent leader in that shop.
6. It is planned to place increased responsibility with the Mechanical and Electrical Group Leaders.
7. Management techniques used for other company management personnel are being extended to the foreman level. Establishment of performance standards, goals, and objectives for each of them will be completed during the next year as their annual reviews are held.
8. Management will become more involved with observation of daily activities through the cleanliness/material inspection program, and through the establishment of the INPO Recommended Job Observation Program.
9. An improvement preventative maintenance program under the direction of a coordinator has been established combining the mechanical, electrical, and I&C preventative maintenance into one system. A feedback system was included to further increase the effectiveness.
10. The Maintenance Engineer will, by direction to the Maintenance Staff and by his review of the preparations, assure that procedures for non routine work are sufficient for the work to be performed.
11. The company is to implement the Davis-Besse Maintenance Management System (DBMMS) in 1983. This will provide:
 - a. Easier access to design and name plate data.
 - b. Automatic work order generation and a complete tracking system.
 - c. A scheduling module.
 - d. An activities tracking program which includes FCR status.
12. The preventative maintenance program will be expanded to include more vibration analysis and an infrared scanning program for station switch-gear.
13. We are also shifting to the use of a "Living Schedule" approach to scheduling major activities including modifications. This will limit the amount of work going on at one time.

III. MAINTENANCE CONTROL (Continued)

14. Toledo Edison will develop a system to document nonconformances found during maintenance and modification activities. This system will include the appropriate trending and followup activities and be in place by July 1, 1983.
15. An engineers training program has been established for new employees.
16. Yearly training plans and dedicated maintenance instructors have been established for electrical, mechanical and I&C groups. This plan includes training or technical skills as well as administrative and procedural requirements.
17. A required reading program has been included which covers all maintenance personnel. This will ensure dissemination of procedure changes and also provides annual review of Standing and Special Orders.
18. All maintenance personnel will be instructed in the requirements of conducting maintenance with an emphasis on their responsibilities in regard to DBMMS and AD 1844.00.
19. All Toledo Edison management personnel are being given instruction in the Kepner-Tregoe process of problem solving and decision making.
20. The Maintenance Department has formed a pilot program called "Quality Circles" in the mechanical group. We are optimistic that it will be successful and will be expanded through the company.
21. The Maintenance Engineer will increase his personal involvement with staff and union personnel. He will attend monthly meetings with supervisors and foremen to discuss the conduct of maintenance covering such items as LER's, DVR's, NCR's and general performance.
22. He will attend the monthly shop meetings at least quarterly.
23. The Lead Maintenance Support Engineer, Lead I&C Engineer, and Lead Electrical Engineer will continue to hold weekly staff meetings and they will attend the monthly foremen/shop meetings.