

Docket No. 50-346

License No. NPF-3

Serial No. 928

April 12, 1983



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

Mr. Albert DeAgazio, Project Manager
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Phillips Building
7920 Norfolk Avenue
Bethesda, MD 20014

Dear Mr. DeAgazio:

We appreciate the opportunity to discuss the approach Toledo Edison has taken in developing the 1983 Integrated Living Schedule Program (ILSP) with Mr. John Stolz and yourself on March 10, 1983. We are aggressively adopting the ILSP for the Davis-Besse Nuclear Power Station Unit No. 1. As we stated in our February 16, 1983 meeting and the March 10, 1983 discussions, we are using the 1983 plan as a bridge to developing a five-year plan. We realize the scope of such an effort and believe that our program will result in the most expeditious path to achieve the desired end product.

We are scheduled to submit a draft plan to the NRC for an ILSP license amendment by the end of April 1983. Toledo Edison recognizes the concerns you have expressed with the program and we plan to constructively address them.

Our plans include addressing each item of Generic Letter 82-33 as well as all identified significant work items in the ILSP. We have currently identified these items in the 1983 ILSP that exceed our previous commitment end dates. These items were addressed in our February 16, 1983 meeting with the NRC. The details of each item are discussed below.

The first item identified that requires a new installation date is the turbine building sump effluent radiation monitor discussed in our January 31, 1983 letter (Serial No. 907). This monitoring system will enhance our ability to monitor effluent discharges automatically rather than manually. The current Radiological Effluent Technical Specifications (RETS) allow either the automatic or manual method to be used. Our resource allocation review indicated more design effort should be completed before we can ensure an optimal system is developed. This prevents us from meeting the previous commitment of December 31, 1983. The new schedule indicates a completion during the 1984 refueling outage.

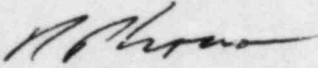
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The remaining two items were identified in the Toledo Edison response to the Performance Appraisal Team (PAT) report. The items include the addition of an accountability card reader system and upgrade of the seismic monitoring equipment. On these items we find that a March and July 1984 completion date, respectively, is required to maximize resources. The review on both of these items indicated that design time and procurement time would not permit completion as previously expected.

Toledo Edison will provide periodic updates on the development of the ILSP as they occur. After submittal of the draft plan for an ILSP license amendment, we will be available to meet with NRC staff personnel as deemed appropriate.

Very truly yours,



RPC:LDY:lah

cc: DB-1 NRC Resident Inspector