

Docket No. 50-346

Licens: No. NPF-3

Serial No. 940

May 10, 1983



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

Director of Nuclear Reactor Regulation  
Attention: Mr. John F. Stolz  
Operating Reactor Branch No. 4  
Division of Operating Reactors  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Stolz:

The purpose of this letter is to provide a status report on Toledo Edison (TED) ongoing activities towards developing and implementing the Integrated Living Schedule Program (ILSP). The program relates to the Davis-Besse Nuclear Power Station Unit No. 1. The present letter is pursuant to our letter of April 12, 1983 (Serial No. 928).

A significant amount of activity was initiated and completed by TED since December, 1982. Internal task forces and standing committees, charged with various activities in producing the Living Schedule, have been created and utilized. A methodology to prioritize the significance of proposed plant change has been devised and is being improved upon. Presentations have been made at various levels of the NRC. The entire process of producing the Living Schedule (although still evolving) has been broadly defined and endorsed by senior management and was used to produce a modified 1983 Capital Budget which has been approved by the Board of Directors.

An overview of this process is included here in Attachment 2. A more detailed version has been prepared internally and is at present being used to present an overall view of present issues with regard to Living Schedule implementation.

Additionally, TED has taken a visible position in the nuclear industry by defining the Living Schedule as the output of a process which provides opportunity for both technical and scheduler integration of plant betterment activities. Attachment 1 provides a definition of "Living Schedule" which we support. We feel that this definition contains several concepts which are fundamental to a successfully implemented ILSP. These include the following:

1. the concept that the Living Schedule is a process (this is the recognition that the validity of the Living Schedule must be based on an understanding of the activities that one has used to identify issues, assess alternative solutions, prioritize requirements, and formulate implementation strategy).

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2. the concept of a continuing process (This is the notion that plans, and therefore, schedules are dynamic in nature and that an activity focused on planning future activities does not eliminate uncertainty; rather it allows one to adjust to the realities of implementation difficulty).
3. the concept that the Living Schedule should contain plant betterment activities (the word activities implies that potential plant changes that compete for finite resources might include operating and maintenance activities as well as plant capital improvements).
4. the concept that the Living Schedule has a basis which is cognizant of safety, regulatory, reliability, operability, and economic factors (this implies an approach to making decisions about plant change in an integrated manner, recognizing that such factors are not independent of one another).
5. the concept that the Living Schedule is coherent with a focus on public health and safety.

The current status of our activities related to implementing the ILSP is outlined below:

1. A draft that could be submitted to the NRC as a proposed approach to regulatory acceptance of the Living Schedule process is being prepared by Toledo Edison. Attachment 3 contains a flow chart of TED's view of NRC interaction on this issue. It is currently expected that the draft will be submitted informally to the NRC by early June. Our present thoughts are presented below.
2. Specific Toledo Edison Nuclear Mission internal procedures and guideline memorandums that are required to implement the ILSP have been identified and are currently being prepared.
3. TED is currently preparing work scope and budget estimates for the 1983 activities that will be required to improve the methodology and internalization of the prioritization portion of the overall ILSP process.
4. TED is currently preparing work scope and budget estimates for 1983 activities that will be required to improve the prioritization and provide implementation support necessary for the ILSP.

One of the licensing options presently being explored is the possibility of an amendment to the Davis-Besse operating license. Such an amendment would be a brief document that indicates Toledo Edison and the NRC agree to use an ILSP work plan as the basis for scheduling and implementing existing and evolving regulatory requirements. The proposed amendment would not include specific scheduling information, or details on how the

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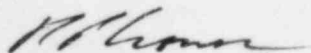
internal Living Schedule process program will be implemented, but rather would refer to a plan which identifies TED/NRC reporting requirements associated with plant change. Subsequent changes to such a plan should not create the need for additional license amendments.

The current plan outline draft will include:

1. General (discuss purpose)
2. Identify responsible parties (title of Toledo Edison and NRC primary contacts, telephone numbers)
3. Reference initial work plan and schedule
4. Schedule Modification Process
  - a. Definitions
  - b. Toledo Edison Company/NRC Notification and Response Responsibilities dealing with:
    1. NRC rules, orders, commitments etc.
    2. All other than NRC commitments
5. General Plan Modifications
  - a. Semi-annual schedule updates
  - b. Modifications to non-schedule plan sections
6. Basis of Inspection and Enforcement
  - a. Concept that what is inspectible is limited to adherence to the plan's reporting procedures, and to firm dates negotiated to comply with rules, regulations and orders.

Although not part of the plan, TED would expect to informally present to the NRC descriptions of the Toledo Edison Company internal assessment process which produces the Living Schedule. We should expect for example, to discuss the assessment process, describe prioritization categories and explain pertinent administrative procedures.

Very truly yours,



RPC:LDY:lah  
attachments  
cc: DE-1 NRC Resident Inspector

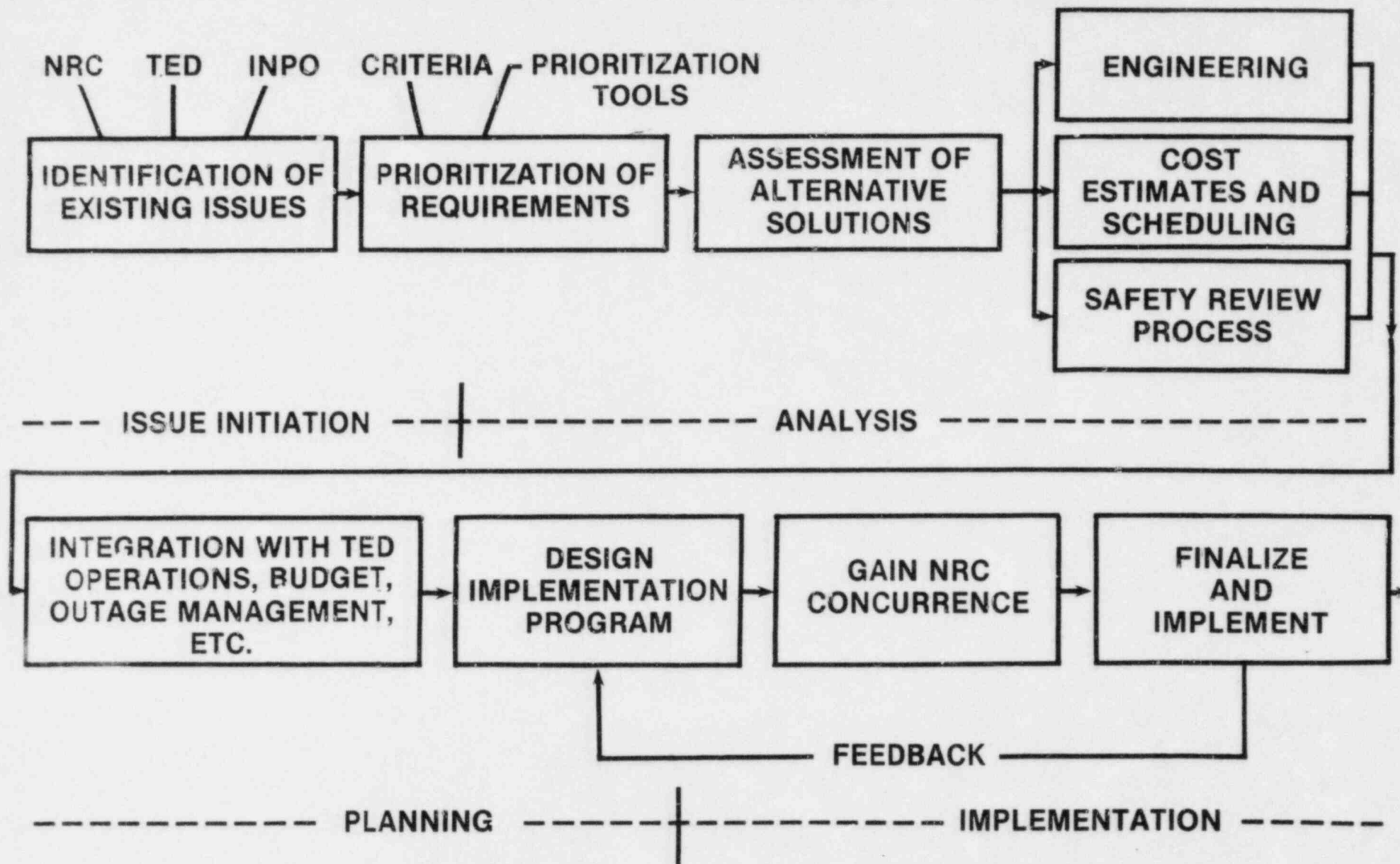
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Attachment 1

INTEGRATED LIVING SCHEDULE PROCESS

PROPOSED DEFINITION

. . . "Continuing process of selecting, integrating, prioritizing and scheduling plant betterment activities on the basis of safety, regulatory, reliability, operability, and economic factors in order to optimize the allocation of resources consistent with an objective for assuring the protection of public health and safety."

## TOLEDO EDISON COMPANY OVERALL MANAGEMENT PROGRAM PROCESS



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Attachment 3

