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Docket Number 50-346

License Number NPF-3

Serial Number 1-1051

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

Subject: Weakness Noted in Implementation of NRC Information
Notice 84-20

Gentlemen:

The Nuclear Regulatory Commission (NRC) conducted a Service Water System Operational Performance Inspection (SWSOPI) at the Davis-Besse Nuclear Power Station (DBNPS) during September through November, 1993. The results of the SWSOPI were documented in NRC Inspection Report 50-346/93016 (IR 93016) which included a Severity Level IV Notice of Violation to which Toledo Edison was required to respond. In addition, Toledo Edison was further requested to address the unresolved items, weaknesses, and inspection follow-up item identified in IR 93016. Toledo Edison responded by letter dated January 28, 1994 (Serial 1-1033). This letter provides clarification and the current status of the weakness identified in implementation of NRC Information Notice (IN) 84-20: Service Life of Relays in Safety-Related Systems.

Serial Letter Number 1-1033 identified the following actions to address the NRC concern regarding weakness in the implementation of IN 84-20:

- (1) Identify all time delay Agastat relays in safety applications or applications that could affect continued power operations.
- (2) Review item (1) to identify those relays with adequate testing or that are expected to fail in their safety position.

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Operating Companies:
Cleveland Electric Illuminating
Toledo Edison

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- (3) Determine an appropriate relay life for Agastat time delay relays for both energized and de-energized applications, based on Agastat relay failure information at Davis-Besse and other sites, vendor information, and related equipment qualification data.
- (4) Verify PMs are in place or initiate new PMs with the replacement frequency determined in item (3).

Nominal lifetimes for Agastat relays have been established based on the evaluation described in item (3). A list of Agastat relays installed in the station has been compiled. The list is divided into two categories; essential channel relays and non-essential channel relays. The essential channel list is considered to adequately cover the scope of relays described in item (1).

PMs have been initiated for essential channel time delay Agastat relays using replacement frequencies consistent with the nominal lifetimes determined in item (3).

Toledo Edison considers these actions sufficient to address the weakness identified in IR 93016.

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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Attachments

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