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Docket Number 50-346

License Number NPF-3

Serial Number 1-1056

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

Subject: Change in Commitment Related to Inspection Report  
Number 50-346/94006

Gentlemen:

Toledo Edison received a violation in routine resident Inspection Report Number (IR) 94006 (Log 1-3063). The violation identified three examples where adherence to station procedures was not adequate.

Toledo Edison responded to the violation by letter dated September 1, 1994 (Serial 1-1050). The identified corrective actions included the development and implementation of a "focus window" to be included in the Windows report, a performance monitoring and trending report issued quarterly at Davis-Besse. The Windows report consists of a visual display of color coded windows arranged in an annunciator panel format and is displayed on bulletin boards throughout the site.

Serial 1-1050 also identified that independent of this violation, potential programmatic compliance issues had been identified through the trending of Potential Condition Adverse to Quality Reports (PCAQRs). Further, the Nuclear Assurance organization had initiated a Suspected Trend Investigation Report (STIR) to examine the procedural adherence issues identified in recent PCAQRs, including the three specific examples identified in IR 94006.

The STIR has since been completed and has resulted in the initiation of PCAQR 94-0747. Because the collective significance of the identified procedural adherence issues requires an escalated level of management attention, PCAQR 94-0747 has been classified a Category 1 PCAQR. Category 1 PCAQRs are currently the highest level corrective action document at Davis-Besse.

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Operating Companies  
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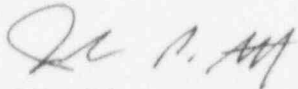
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A multi-disciplined team has been assembled to investigate the programmatic root causes of the procedural adherence issues at Davis-Besse and to identify corrective actions. A comprehensive action plan has been developed which emphasizes training, clear communication of management expectations, streamlining of procedure processes, and attention to detail on the part of procedure end users.

Toledo Edison has re-evaluated the benefit of implementing the procedural adherence "focus window" as described in Serial 1-1050. Based on the action plan currently in place for Category 1 PCAQR 94-0747, Toledo Edison has determined not to implement the procedural adherence "focus window" at this time.

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,



AVA/eld

cc: L. L. Gundrum, NRC Project Manager  
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