



Docket No. 50-346

License No. NPF-3

Serial No. 1-401

January 6, 1984

RICHARD P. CROUSE
Vice President
Nuclear
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Mr. C. E. Norelius, Director
Division of Project and Resident Programs
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Norelius:

Toledo Edison acknowledges receipt of your December 7, 1983 letter (Log No. 1-882) and enclosures; Appendix A, Notice of Violation; Appendix B, Notice of Deviation; and report 50-346/83-20 (DRP) referencing two (2) apparent violation and one (1) deviation on the Davis-Besse Nuclear Power Station, Unit No. 1.

Following an examination of the items of concern, Toledo Edison herein offers information regarding these items:

1. Violation: Technical Specifications Section 6.8.1.a requires written procedures to be established, implemented and maintained for the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972; Regulatory Guide 1.33, November, 1972, Appendix A lists Administrative Procedures as Section 1.

Administrative Procedure (AD) 1838.2, "Performance of Surveillance and Periodic Tests, "Section 5, states, "after a surveillance or periodic test is completed...the shift supervisor shall be notified. The shift supervisor shall then return any system and/or equipment to its desired condition."

AD 1839.00, Station Operations, states as #10 on the shift supervisor's list of duties and responsibilities: "Grants permission to start tests and review completed tests to ensure technical specification requirements are met."

AD 1844.00, Maintenance, states in Table 1.4 under the shift supervisor's responsibilities: "Returns systems and equipment to operating status following completion of maintenance work."

Contrary to the above, Safety Features Actuation Channel #4's containment radiation bistables were reset during acceptance testing of a replacement detector for RE 2007 returning the Safety Features Actuation Channel to service without the shift supervisor's knowledge or approval.

This is considered a Severity Level IV violation (Supplement 1).

Response: (1) Corrective action taken and results achieved.

While performing ST 5099.01, Miscellaneous Instrument Shift Check, the reactor operators noticed that RE 2007 bistable was reset and questioned the Shift Supervisor concerning operability. The Shift Supervisor, knowing the channel had not been declared operable, tripped the bistable for SFAS Channel 4 containment radiation to place the unit in compliance with Technical Specification 3.3.2.1.

(2) Corrective action to be taken to avoid further non-compliance.

A Temporary Modification (T7525) to ST 5031.04, Containment Radiation Monitor Input to the SFAS Refueling Period Calibration, was written to require that the Shift Supervisor discuss with the I&C Technician resetting of the SFAS channels following testing for post maintenance operability.

(3) Date when full compliance will be achieved.

Toledo Edison achieved full compliance on October 11, 1983 when T-7525 was approved by the Station Review Board and approved by the Station Superintendent.

2. Violation: Technical Specification 3.6.5.1 requires two independent emergency ventilation systems to be operable in modes 1, 2, 3, and 4.

Technical Specification 6.9.1.9.b requires "Conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation to be reported in writing within 30 days of date of occurrence to the NRC."

Contrary to the above, a condition which rendered emergency ventilation system train #1 inoperable was not reported to the NRC. The improper condition was the incorrect supporting of conduit 1-38609-A which was determined on September 9, 1983, to render the conduit and the emergency ventilation system #1 inoperable. A 30 day licensee event report was not written to the NRC on this occurrence.

This is considered a Severity Level V violation (Supplement 1).

Response: (1) Corrective action taken and results achieved.

Nuclear Facility Engineering notified the Technical Section on November 14, 1983 concerning NCR 83-32. The Technical Section initiated DVR 83-172 on November 17, 1983. Nuclear Facility Engineering responded by completing Licensee Event Report (LER) NP-33-83-93 on December 5, 1983.

(2) Corrective action to be taken and results achieved.

At the time NCR 83-32 was written (May 13, 1983), the NCR form was not explicit regarding notification to the Technical Section if a system or component under an NCR was unable to perform its intended safety function. The NCR form and Nuclear Facility Engineering Procedure, NFE-007, Processing of Nonconformance Reports (NCRs) and Supplier Deviation Reports (SDR's) were revised to include the notification of the Technical Section if the engineering evaluation indicates the system or component is unable to perform its intended safety function.

(3) The date when full compliance will be achieved.

LER NP-33-83-93 was submitted to the NRC on December 16, 1983. Implementation of procedure revisions were completed on December 20, 1983.

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1. Deviation: On January 12, 1982, the licensee committed to change procedures, train operators, and update drawings following modifications of systems prior to declaring the modified systems operable. See Inspection Report 82-05.

Contrary to the above commitment, the licensee placed the service water and high pressure injection systems in service after the 1983 refueling outage without updating the drawings associated with modifications FCR 80-88 Supplement 29 and FCR 80-93 Supplement 15 as authorized by MWO 2-80-88-01 and MWO 2-80-93-03 which were completed before the end of the refueling outage.

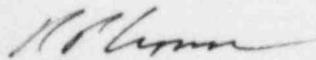
Response: (1) Corrective action taken (or planned) and the results achieved.

Significant effort was placed on the closing of MWO's during the 1983 refueling outage. As a result, MWO 2-80-88-1 and MWO 2-80-93-03 were inappropriately suspended in the effort to return Davis-Besse to operation. Special Order 15, Conduct of Maintenance; Prompt Administrative Closeout of MWO, is being revised to give interim additional direction to station employees on the suspending of MWO's. Administrative Procedure AD 1844.00, Maintenance, will be revised to give specific guidance to be used for the suspension of MWO's.

(2) Date when corrective action will be complete.

Administrative Procedure, AD 1844.00, will be revised and implemented by April 1, 1984.

Very truly yours,



RPC:SGW:lrh
Enclosures