

Docket No. 50-346

License No. NPF-3

Serial No. 1-395

November 25, 1983



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

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 October 28, 1983 letter (Log No. 1-862) and enclosures, Appendix A, Notice of Violation, and report 50-346/83-19 (DPRP) referencing two (2) apparent violations 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 require written procedures to be established, implemented and maintained for the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972. Administrative Procedures are listed as applicable procedures.

Section 5.1.1.4 of the Toledo Edison Quality Assurance Manual states that procedures shall "be complete, current, and contain sufficient quantitative and qualitative acceptance criteria as appropriate to verify satisfactory work performance."

Section 2.2.3.1.1 of the Toledo Edison Quality Assurance Manual states "work, operational, and test procedures for non-routine or non-repetitive activities are also approved by the Quality Assurance Director. Examples of these activities are . . . tests and experiments subject to 10 CFR 50.59."

8312200202 831216  
PDR ADOCK 05000346  
Q PDR

NOV 30 1983

Section 5.20 of AD 1805.00, Administrative Procedure Preparation and Maintenance, defines Test Procedures (TP) as "Procedures that are non-routine and non-repetitive that are used to perform a specific test. See enclosure 22 for format." Enclosure 22 requires acceptance criteria.

Contrary to the above, the test outline of Facility Change Request 83-066 was not incorporated into a test procedure resulting in no acceptance criteria being assigned to the test. In addition, the test was not approved by the Quality Assurance Director prior to implementation. The Facility Change Request tested the station's electrical distribution system response to bypassing the diesel generator undervoltage relay when starting a reactor coolant pump required by license amendment 52.

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

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

Facility Change Request (FCR) 83-066 was generated in response to your letter dated February 17, 1983 (Log No. 1218) to test the Station's electrical distribution system response to a degraded grid voltage condition. No acceptance criteria was assigned since the testing being performed was to obtain data to verify assumptions used in the voltage analysis. Personnel involved have subsequently reviewed governing procedures on preparation of test outlines.

(2) Corrective action taken to avoid further noncompliance.

A temporary modification request (T-7458) was issued for Administrative Procedure AD 1845.00, Changes, Tests, and Experiments. This modification adds the following to Step 9.5:

"Acceptance testing of FCR modifications, or tests and experiments approved by a Facility Change Request, will be conducted from a prepared approved procedure and NOT from the recommended test outline provided in the FCR package."

- (3) Date when full compliance will be achieved.

Full compliance was achieved September 21, 1983.

2. Violation:

10 CFR 50, Appendix B, Criterion II, Quality Assurance Program, states in part ". . . The applicant shall establish . . . a quality assurance program which complies with the requirements of this appendix. The program shall be documented by written policies, procedures or instructions. . . the program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained.

Toledo Edison Quality Assurance Manual Sections 1 and 2 delineate responsibilities for administration of the training program including establishing training programs and courses, supervising course presentation, evaluating training effectiveness and training and retraining of personnel. The QA Manual also lists Criteria I, II, V, VI, XVI, XVII and XVIII as applicable to personnel training.

Contrary to the above, the licensee has not adequately implemented all the elements of the Quality Assurance Program for personnel training in that:

- a. The responsibilities and authorities of the personnel in the Nuclear Training Department have not been delineated in writing as required by Criterion I.
- b. No procedures have been established by the Nuclear Services Director as applicable to the quality activities performed by the Nuclear Training Department as required by Criterion V.
- c. No mechanism exists for reporting and correcting conditions adverse to quality. The Quality Assurance Manual addresses only two mechanisms, neither of which are applicable to the Nuclear Training Department. Criterion XVI requires a mechanism.

- d. The Quality Assurance Manual does not assign training responsibilities specified in ANSI N45.2-1977 to any organization.
- e. A continuing training program has not been established for the non-licensed operator positions of Safety Equipment Operator-I, Equipment Operator-III and Equipment Operator-I.

This is a Severity Level IV violation (Supplement I).

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

In September, 1983, Toledo Edison undertook a diagnostic program in the Nuclear Training Department to identify areas where changes should be made to improve the effectiveness of the Department as well as the overall Nuclear Training Program. The diagnostic is comprehensive in nature and has one of its areas addressing the delineation of roles, responsibilities, interfaces, and authorities of the Nuclear Training Department and all other departments that have roles in the overall Nuclear Training Program. The results of this diagnostic are going to be used in the redefinition, prioritization, and scheduling of improvement actions. The diagnostic data gathering is completed and the synthesis is in process. A final report with recommendations is planned for January 31, 1984. Delineations of roles and responsibilities in the Nuclear Training Department and how these relate to the Quality Assurance Program, Industry Standards, and the Institute of Nuclear Power Operations guidance will be a major activity in implementing our improvement programs. Depending on the documentation methodology selected or developed, this could be available by February 29, 1984.

(2) Corrective action taken to avoid further noncompliance.

Documentation will be provided to ensure delineation of those responsibilities as they are resolved from the current training diagnostic discussed above.

(3) Date when full compliance will be achieved.

Documentation is planned to be in place by February 29, 1984.

b. (1) Corrective action taken and results achieved.

Controlled procedures are in place at Toledo Edison that define specific training programs for selected Station personnel in the Administrative Procedure AD 1828.00 series. A procedural methodology and approach to identify what specific activities of the Nuclear Training Department fall under the definition of "quality activities" will be developed as a result of the diagnostic program identified above. From this definition, a specific list of procedures and a prioritized schedule will be developed. This activity will be integrated into the overall Toledo Edison Nuclear Training Program improvements related to the results of the diagnostic program.

(2) Corrective action taken to avoid further noncompliance.

Nuclear Services Division procedures will be established for "quality activities" performed by the Nuclear Training Department under the Toledo Edison Nuclear Training Program.

(3) Date when full compliance will be achieved.

A schedule identifying the procedure development program will be integrated into the general Nuclear Training improvement activities and will be available February 29, 1984.

c. (1) Corrective action taken and results achieved.

Section 16.0 of the Nuclear Quality Assurance Manual is being expanded to require each organization involved with implementing the Quality Assurance Program to have procedures for reporting and correcting conditions adverse to quality.

(2) Corrective action taken to avoid further noncompliance.

Procedures will be established for reporting and correcting conditions adverse to quality.



- (3) Date when full compliance will be achieved.

The change to the Nuclear Quality Assurance Manual and its resultant implementing procedures will be developed and implemented prior to April 1, 1984.

- d. Toledo Edison disagrees with this portion of the Item of Noncompliance. Section 2.3.3 of the Nuclear Quality Assurance Manual states:

"The Nuclear Services Director is responsible for providing training, retraining, and replacement training programs to meet the requirements of the Davis-Besse Unit #1 Technical Specifications and ANSI N18.1. This program shall include training in Quality Assurance requirements and job related procedures."

It is Toledo Edison's position that since the training program includes training in Quality Assurance requirements and job related procedures, the requirements of ANSI N45.2-1977 are satisfied. As stated above, the responsibility for this program rests with the Nuclear Services Director. A broad based training program diagnostic evaluation mentioned previously is being undertaken by the Nuclear Services Director. The outcome of this effort will better define the organizational training responsibilities related to ANSI N45.2-1977. These will be defined in writing. Depending upon documentation methodology selected or developed, this could be available by February 29, 1984.

- e. (1) Corrective action taken and results achieved.

Toledo Edison currently has only five (5) individuals that will remain in one of three non-licensed positions without proceeding to higher qualified positions. Those that proceed receive adequate continuing training in their positions through this advancement process. However, the five who are now in non-licensed positions and are not pursuing higher qualifications do participate in the facility modifications training prior to restart from refueling outages. These positions are also included in the required reading program or special training class on particular issues as applicable.

Docket No. 50-346  
License No. NPF-3  
Serial No. 1-395  
November 25, 1983  
Page 7

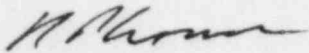
- (2) Corrective action taken to avoid further noncompliance.

A procedure is being developed to address the requalification training of any individuals in permanent non-licensed positions. This procedure will identify the method for requalification training and evaluating the permanent non-licensed positions.

- (3) Date when full compliance will be achieved.

The administrative procedure will be in place by February 1, 1984.

Very truly yours,



RPC:SGW:nlf  
cc: DB-1 NRC Resident Inspector