

Docket No. 50-346

License No. NPF-3

Serial No. 1042

April 16, 1984



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Vice President  
Nuclear  
(419) 259-5221

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Eisenhut:

The Toledo Edison Company submitted to you on November 23, 1983 (Serial No. 1004), a revised schedule for completing certain evaluations to address the audit findings identified during the Nuclear Regulatory Commission (NRC) 10 CFR 50 Appendix R Audit performed at the Davis-Besse Nuclear Power Station, Unit No. 1 (DB-1). The proposed schedules were found acceptable, per NRC letter from J. F. Stolz, dated January 3, 1984 (TED Log No. 1428).

Since initiation of the Audit Response Program, considerable progress has been made towards the resolution of the findings. This progress has been demonstrated at a series of meetings held with various members of the NRC Staff. Meetings to discuss progress have been held on September 14, 1983, October 4, 1983, December 8, 1983, January 25, 1984, March 21, 1984, and a workshop on March 23, 1984. The staff has been generally positive in its acceptance of Toledo Edison's approach and progress, to date.

The program status review meetings that have been held thus far have proven to be extremely beneficial. It is our intent to continue these meetings to assure a satisfactory resolution of the Fire Protection issue at Davis-Besse.

As was discussed at our last program status meeting, Toledo Edison is now able to more accurately determine the extent of activities requiring completion prior to the Appendix R Audit Response submittals. The revised schedule for our submittal is included as Attachment 1 to this letter. Many factors have impacted the Toledo Edison Fire Protection Audit Response effort. Among these were:

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1. Lack of the Fire Protection Audit Inspection Report

The Fire Protection Audit Inspection Report has not yet been received by Toledo Edison. Our previous effort and schedules were predicated upon the receipt of the report. While continuing with its aggressive effort, Toledo Edison believes that all work performed should undergo an in depth review against the inspection report prior to submittal to the NRC. This is needed to ensure that the Toledo Edison reviews adequately address the documented audit findings.

Toledo Edison is now at a point on many of the tasks, that the review of our effort to the specific findings should be performed. Upon receipt of the inspection report, the activities on these specific tasks can be reinitiated and completed. The September 1, 1984 submittal dates can only be met if inspection report receipt occurs prior to August 1, 1984.

Toledo Edison will submit the Task 1, 2, and 5 results as stated on the attached schedule, without regard to receipt of the inspection report. This can be done because of the generic nature of the Appendix R reassessment.

2. The NRC Region III Mandated Performance Enhancement Program (PEP)

Toledo Edison is fully involved in the PEP, implemented to improve overall Nuclear Mission performance in regulatory and non-regulatory issues. This program is drawing manpower from all divisions within Toledo Edison. An average of 200 mandays per week is being expended in this effort. This has drawn from the resources available to address the Audit Response Program and, therefore, has impacted schedules. Toledo Edison is committed to this PEP program. As part of the program, the generic nature of the fire protection program deficiencies are being addressed.

3. Specific Technical Program Support Activities

Technical issues have evolved through performance of the Audit Response effort that have impacted resources and the previous schedules. These issues have been discussed with your staff and the need to address them has staff concurrence. These issues include: reevaluation of in-plant combustible loadings, development of detailed documentation packages, and development of the administrative program to ensure compliance to Appendix R throughout plant life.

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4. Ongoing NRC Guidance Incorporation

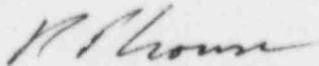
Toledo Edison has taken aggressive steps to educate its staff in the appropriate interpretation of Appendix R. This has occurred through detailed internal document reviews, utility group interactions, active participation in Fire Protection Seminars and Workshops, and consultant interactions.

However, NRC clarifications have continued to be received by Toledo Edison. These clarifications, which are being factored into the Appendix R reassessment, include IE Notice 84-09, Generic Letter 83-33, and the current Appendix R workshop information.

Toledo Edison is developing an Appendix R program that will be responsive to the latest guidances and interpretations. This reevaluation has caused delays, but is in Toledo Edison's interest to ensure that the latest information available is factored into the Toledo Edison response. The revised dates were developed considering the guidance information currently available.

Assuming no further program perturbations, Toledo Edison feels it will meet the provided schedules. Toledo Edison will continue its high priority effort on the resolution of all fire protection issues.

Very truly yours,



RPC:JSH:nlf  
encl.

cc: DB-1 NRC Resident Inspector

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Attachment 1

REVISED TASK COMPLETION SCHEDULE

| <u>TASK/COMMITMENT</u> <sup>(1)</sup> | <u>TITLE</u>                                     | <u>COMPLETION<br/>DATES</u> | <u>COMMENTS</u>  |
|---------------------------------------|--|-----------------------------|--|
| 1 and 2                               | Appendix R<br>Reassessment                       | 9/1/84                      | Total Appendix R<br>Evaluation.  |
| 3 and 7                               | Fire Pro-<br>tection Com-<br>mitment Re-<br>view | 9/1/84                      | Documenting FHAR,<br>FSAR, NFPA, and<br>BTP 9.5-1, Appendix<br>A Commitments.  |
| 4                                     | Emergency<br>Lighting                            | 1/1/85                      | Task complete to<br>original scope,<br>lighting review<br>will require up-<br>dating upon com-<br>pletion of Tasks<br>1 and 2. |
| 5                                     | Associated<br>Circuits<br>Analysis               | 9/1/84                      | Responsive to<br>NRC Guidance<br>(i.e. Generic<br>Letter 81-12<br>and clarifica-<br>tion letter).                              |
| 6                                     | One Hour<br>Barrier Re-<br>view                  | Complete                    | Status will be<br>provided in re-<br>sponse to Audit<br>Inspection Report.   |

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Attachment 1

| <u>TASK/COMMITMENT</u> <sup>(1)</sup> | <u>TITLE</u>   | <u>COMPLETION<br/>DATES</u> | <u>COMMENTS</u>  |
|---------------------------------------|--|-----------------------------|--|
| 8                                     | Fire Pre-<br>plan Re-<br>vision                        | 3/1/85                      | Full Preplan (260<br>existing preplans)<br>Revisions cannot<br>commence until com-<br>pletion of Tasks 1<br>and 2. Estimate<br>maximum of eleven<br>months to complete<br>revision. Preplans<br>for rooms containing<br>safe shutdown com-<br>ponents will be<br>given priority. |
| No Number<br>Assigned                 | Damper<br>Testing<br>Schedule<br>& Plan<br>Development | Complete                    | Discussion will be<br>provided in response<br>to Audit Inspection<br>Report.   |

- (1) Task numbers coincide with Tasks identified in the original Audit Response Program submittal (Serial No. 986, dated September 13, 1983). Tasks are now grouped as they relate to each other and will be submitted in that manner. Only Tasks 1, 2, 3, and 5 will be submitted to the NRC (Reference Restart Safety Evaluation Report, Log No. 1375, dated September 23, 1983). Status of other tasks will be provided in the TED response to the Audit Inspection Report.

JSH:nlf