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Subject: Addendum to Serial 1962, Summary of Major Changes to Section
17 of USAR Revision 14

Gentlemen:

Toledo Edison is submitting this addendum in response to NRC's letter dated September 19, 1991 (Log 1-2537) and in response to a telephone conversation with Mr. Fred Maura of your office on October 1, 1991. The subject of the letter and telephone conversation were questions the NRC had with changes made to Section 17.2, Quality Assurance Program description, in Revision 14 of the Updated Safety Analysis Report (USAR). Attachment 1 contains additional information regarding changes made in Section 17.2 of the USAR.

Toledo Edison has reviewed these changes and has reconfirmed its position that these changes do not constitute any reductions in commitment in accordance with 10CFR50.54(a). The detailed documented analyses for these changes are available for your review at the Davis-Besse Plant site.

Should you have any questions or require additional information, please contact Mr. Robert W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,


JP./dlm

cc: A. R. Davis, Regional Administrator, NRC Region III
J. B. Hopkins, NRC Senior Project Manager
W. Lewis, DB-1 NRC Senior Resident Inspector
Utility Radiological Safety Board

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The following changes were made to Section 17.2 of the USAR and were not included in the summary of changes for Revision 14 of the USAR, which summarized the major changes made to the document.

- 1) Paragraph 17.2.2.2 was modified to clarify the graded application of program requirements in the Nuclear Quality Assurance Program. The purpose of a graded application is to apply QA program requirements consistent with the items importance to safety. The clarification is consistent with Toledo Edison's commitment to ANS 3.2, paragraph 1.2. Table 17.2-1, "Applicable NRC Regulatory Guides, ANSI Standard, and Industry Codes", was also revised to provide consistency with changes made in paragraph 17.2.2.2, by delineating the graded application for Augmented Quality (AQ) items as they apply to Regulatory Guide 1.30, ANSI/ANS 3.2 and Regulatory Guide 1.123

In response to an additional question Mr. Maura had regarding which organization is responsible for determining the graded application to AQ items; the engineering department is tasked with determining the technical as well as the quality requirements for items within the scope of the Nuclear Quality Assurance Program.

- 2) The term "Q" was added after the term "commercial grade" in Table 17.2-1, item 16.2.a. The term "commercial grade" "Q" was added to differentiate between items purchased commercial grade that are to be dedicated for "Q" applications from those other commercially procured items. Section 17.2.4.1, Procurement Document Control, details the the process for dedicating a commercial grade item for use in Q applications.

The next annual update to the Safety Analysis Report will add a statement to Table 17.2-1, item 16.2.a to clarify the phrase "commercial grade" "Q".

- 3) In section 17.2.6.1 item f, the Radiation Protection Manual was deleted from the listing of controlled documents that have established control measures. This change was made since the requirements specified in the Radiation Protection Manual were placed in a Nuclear Group procedure and Department/Section procedures. Toledo Edison's commitment is not altered since it is still maintained in item e, "Department/Section procedures and instruction including interface procedures", of the same section of the USAR.