

March 20, 1984



**RICHARD P. CROUSE**  
Vice President  
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(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. Eisenhower:

Toledo Edison acknowledges receipt of your letter dated February 21, 1984 (Log No. 1456), issuing an Order confirming our commitments to implement those post-TMI related items set forth in Supplement 1 to NUREG-0737 -- Requirements for Emergency Response Capability. This letter is being submitted to update our letter dated July 11, 1983 (Serial 968), on the status for completing each of the basic requirements of Supplement 1 to NUREG-0737.

During our February 3, 1984 presentation to Mr. Stolz and staff on the status of NUREG-0737 items, Toledo Edison identified with a high degree of certainty the potential to not meet certain dates identified in our letters of April 15, 1983 (Serial 933) and July 11, 1983 (Serial 968). Toledo Edison was disappointed that the NRC did not request additional input regarding why these dates would not be met prior to making the decision to issue the Confirmatory Order.

The Detailed Control Room Design Review (DCRDR) Program Plan submitted on June 15, 1983 (Serial 958), indicated that Toledo Edison has retained the Essex Corporation to assist in the DCRDR project. During January, 1984, Essex identified a problem associated with the original approach to the Toledo Edison DCRDR, which has led to non-acceptance by the NRC staff on other DCRDR efforts.

As a result of the Essex Corporation findings, the scope of the Toledo Edison DCRDR program has been modified to include an additional analysis effort independent of that originally identified in the DCRDR Program Plan. The system function review and task analysis identified in the program plan were to be based on event sequences considered in the Davis-Besse Abnormal Transient Operating Guidelines (ATOG). The additional work to be performed will include:

- (1) The systems functions review and task analysis based on the symptom-oriented emergency operating procedures under development at TED, and

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- (2) The systems function review based on the safety sequence diagrams originally prepared for the ATOG effort.

The review of the safety sequence diagrams will identify the appropriate safety systems, system functions, operator actions, and instrumentation and control requirements necessary to satisfy critical safety functions. These requirements will then be compared to the results of the system function review and task analysis based on the symptom-oriented emergency operating procedures (EOPs). This effort will provide an independent assessment of the system function review and task analysis based on the symptom-oriented EOPs to assure that it was not unduly biased by a prior knowledge of the Control Room instrumentation and controls. In the February 3, 1984 meeting, Toledo Edison discussed with your staff the potential for delays based upon the above described scope change. Based upon the scope change, Toledo Edison has reassessed the DCRDR program activities and requests an extension on the summary report submittal date from April 15, 1984 until June 30, 1984.

Toledo Edison indicated in our April 15, 1983 letter (Serial 933) that a systematic review of existing Davis-Besse instrumentation was to be conducted in accordance with the guidelines of Revision 2 of Reg. Guide 1.97. Revision 3 to Reg. Guide 1.97 was issued in May, 1983 and Toledo Edison is now conducting the review utilizing the guidelines of Revision 3. Toledo Edison's Environmental Qualification (EQ) Manual does not include those variables which are non-Q, except for some items required for cold shutdown. Reg. Guide 1.97 indicates that certain additional non-Q items be qualified under our EQ program. Identification and categorization of these non-Q variables is being performed as part of the Reg. Guide 1.97 review, but additional time is necessary to perform the environmental qualification review to determine if changes are warranted.

Additionally, the Fire Protection audit and our extensive fire protection review program has identified the availability of additional information required for alternate shutdown per 10 CFR 50, Appendix R. As a result, these additional needs are being evaluated against Reg. Guide 1.97.

Given the additional evaluations identified above, Toledo Edison has reassessed the Reg. Guide 1.97 review activities and requests an extension on the summary report submittal date until June 30, 1984.

In our April 15, 1983 letter (Serial 933), Toledo Edison identified that implementation of design improvements resulting from the DCRDR and the Reg. Guide 1.97 review would be scheduled in accordance with the criteria set forth in our Integrated Living Schedule Program (ILSP). In our previous letters, we did not commit to provide a schedule for implementation of modifications by April 15, 1984. Submittal of an implementation schedule by April 15, 1984 is considered by Toledo Edison to be inappropriate and unrealistic. The activities that must be included in a realistic implementation schedule include: budget constraints, conceptual engineering,

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design engineering, long lead material procurement, bulk material procurement, detailed outage and non-outage implementation scheduling, start-up testing, procedure development, and training. Design, procurement, and implementation of modifications will occur over a time frame of one to two fuel cycles. This methodology is the basis for Toledo Edison's ILSP.

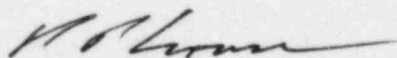
In order to develop the schedules for each of the activities identified above, Toledo Edison will, in some cases, have to perform specific engineering analysis to evaluate alternative fixes to accomplish the objectives identified in the DCRDR and Reg. Guide 1.97 reviews. Once the selected design alternatives are known, the necessary summary level planning information will be prepared and the project will be reviewed and prioritized as part of our ILSP process. Finally, the ILSP implementation schedule will be reviewed consistent with our capital program budget review process, consistent with the time required to complete the above activities.

Toledo Edison will submit an appropriate implementation schedule for identified DCRDR and Reg. Guide 1.97 design improvements by January 31, 1985, which will incorporate those activities that must be included in developing a realistic implementation schedule.

As a final point of clarification, our letter of April 15, 1983 (Serial 933) committed to implementation of the new emergency operating procedures during the 1984 Refueling Outage. The change to the new emergency operating procedure structure will occur over a refueling outage due to the large amount of paperwork involved in changing all existing emergency procedures at one time. Subsequent to that letter, our letter of July 11, 1983 (Serial 968) indicated a completion date of September 30, 1984. This date was based upon the 1984 Refueling Outage beginning on August 1, 1984. In the event our refueling outage does not begin on August 1, 1984, the September 30, 1984 date may not be accurate. Therefore, we would like to clarify that, as committed to in our April 15, 1983 letter (Serial 933), implementation of the new emergency operating procedures scheduled completion date is the conclusion of the 1984 Refueling Outage.

Based on the above factors, Toledo Edison requests an extension on the completion dates from April 15, 1984 to June 30, 1984 for the Supplement 1 to NUREG-0737 items identified in Attachment 1 to this letter.

Very truly yours,



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encl.  
cc: DB-1 NRC Resident Inspector

COMMITMENTS ON SUPPLEMENT 1 TO NUREG 0737

TITLE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS)
1. Safety Parameter Display System (SPDS)	1a. Submit a safety analysis and an and an implementation plan to the NRC.	Submitted 11/30/83
	1b. SPDS fully operational and operators trained.	11/30/83
2. Detailed Control Room Design Review	2a. Submit a program plan to the NRC.	Submitted 6/15/83
	2b. Submit a summary report.	6/30/84
	2c. Submit a proposed schedule for implementation of design improvements resulting from the DCRDR.	1/31/85
3. Regulatory Guide 1.97 - Application to Emergency Response Capabilities	3a. Submit a report to the NRC describing how the requirements of Supplement 1 to NUREG 0737 have been or will be met.	6/30/84
	3b. Submit a proposed schedule for implementation of design improvements resulting from the Reg. Guide 1.97 review.	1/31/85
4. Upgrade Emergency Operating Procedures (EOP's)	4a. Submit a Procedures Generation Package to the NRC.	Submitted 3/1/84
	4b. Implement the upgraded EOP's.	9/30/84*
5. Emergency Response Facilities	5a. Technical Support Center fully functional.	Completed
	5b. Operations Support Center fully functional.	Completed
	5c. Emergency Operations Facility fully functional.	Completed

\*Tied to the 1984 refueling outage.

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