

Docket No. 50-346

License No. NPF-3

Serial No. 1-199

May 8, 1981



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

Mr. James G. Keppler, Director, Region III
United States Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Attached please find the Toledo Edison Company response to concerns resulting from the inspection conducted by the Performance Appraisal Section. Those concerns were presented in your letter dated April 17, 1981.

Should you have any questions, my staff and I will be happy to respond.

Very truly yours,

RPC:CEW:nlf
encl.

cc: D-B NRC Resident Inspector

*Rec'd 7/12/84
IE3/ Thru-D. Wheller
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TOLEDO EDISON COMPANY

RESPONSE TO

NUCLEAR REGULATORY COMMISSION, REGION III

LETTER DATED APRIL 17, 1981

Item: 1. Technical Specification 6.5.2.7 states: "The Company Nuclear Review Board shall review: a. The safety evaluations for...changes to procedures...completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question," and "e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance."

Contrary to this:

- a. Procedure MP 1401.15, "Pressurizer Spray Valve Removal and Replacement" was deleted from Appendix 13C of the FSAR, without a safety review or safety evaluation being performed and
- b. The CNRB did not review violations to Technical Specifications identified in some Deviation Reports (DVR's) and Audit Finding Reports (AFR's).

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

- Response: a. The requirements of MP 1401.15 were incorporated into other procedures (MP 1410.32, MP 1401.19 and the Davis-Besse general welding procedure). The deletion of MP 1401.15 has been reviewed and a safety evaluation written. The safety evaluation has been submitted to Nuclear Engineering as a part of FCR 81-132. The CNRB will be given the opportunity to review this Safety Evaluation, since all FCR's which require safety evaluations, are reviewed by them.
- b. The Station Review Board is currently reviewing Deviation Reports (DVR's) and Audit Finding Reports (AFR's) for violations of Technical Specifications. All Technical Specification violations are being forwarded to the CNRB for their review.

Item: 2. Technical Specification 6.5.1.2 requires the Station Review Board (SRB) membership to include a "Reliability Engineer."

Contrary to the above, current SRB membership does not include a Reliability Engineer.

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

Response: Corrected. No action required.

Item: 3. Technical Specification 6.5.1.6.e requires the Station Review Board (SRB) to be responsible for the "Investigation of all violations of the Technical Specifications including preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President - Nuclear and to the Chairman of the Company Nuclear Review Board."

Technical Specification 6.5.1.7.b requires the SRB to "Render determinations in writing with regard to whether or not each item considered under TS 6.5.1.6.e, technical specification violations, constitutes an unreviewed safety question."

Contrary to the above:

- a. The SRB or another review group under its cognizance did not review violations of technical specifications reported in QA audit reports and AFR's, and
- b. For those records examined, the SRB did not render determinations in writing with regard to whether or not each item considered under TS 6.5.1.6.e constituted an unreviewed safety question.

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

- Response: a. The Station Review Board has adopted the practice of reviewing Audit Finding Reports, to determine if any violation of Technical Specifications has been committed. Administrative memorandum #35 was revised to ensure the SRB receives copies of all audit finding reports.
- b. Corrected. No response required.

- Item: 4. Technical Specification 6.8.1 requires procedures recommended in Appendix "A" of Regulatory Guide 1.33 be established, implemented, and maintained. Appendix "A" of Regulatory Guide 1.33 includes Administrative Procedures.

The following are examples of noncompliance with this requirement:

- a. Administrative Procedure AD 1828.11, "Maintenance Section Training," requires Repairman and Serviceman receive GOT I and II, Nuclear Power Plant Steam and Mechanical Fundamentals (now Basic Nuclear Technology), Maintenance Radiation Protection Training (now Radiological Control Training), Quality Assurance Training, Serviceman Training, and Continuing Training of 12 hours annually, including retraining in GOT I and II.

Contrary to the above, records indicated that several station servicemen had not received the total training specified in the Serviceman Training Program.

- b. QCI 3070, Receipt Inspection, required that storage levels of equipment be designated and identified on a General Material Inspection Checklist (GMIC) by the appropriate section head (mechanical or I&C), and that the designation be done in accordance with AD 1847.03, Section 5.4, "Material Handling Criteria."

AD 1847.03 requires Level "A" storage be given to instrumentation.

Contrary to the above, the GMIC prepared for receipt inspection of PO Q44245, Nuclear Instrumentation, was signed by an unauthorized person. In addition, storage Level "B" was designated instead of Level "A".

- c. Quality Assurance Procedure 2180, Section 7.7.1 requires that "Management of the audited organization shall respond to the audit report as established on the audit finding... In no instance is this established response time greater than 30 days."

Quality Assurance Procedure 2160, Section 7.3.2 requires that when corrective action to a Corrective Action Report (CAR) is not completed, "its status shall be reported to the QA director every 30 days until its completion."

Contrary to above:

- (1) The time to respond to the majority of the audit finding reports was greater than 30 days, and
- (2) The status of uncompleted Corrective Action Reports was not submitted every 30 days.

- d. Administrative Procedure AD 1847.03, "Materials Handling and Storage Requirements," contains directions for the implementation of the requirements of Regulatory Guide 1.38 ANSI (N45.2.2).

ANSI N45.2.2, Section 6, Storage, contains specific requirements for control of items in storage.

ANSI N45.2.2 Paragraph 7.4 requires an inspection program to be established for all handling equipment. Paragraph 7.8 requires that hoisting equipment be certified by the manufacturer indicating the various parameters for the maximum load to be handled.

Contrary to the above:

- (1) Class "A" storage facilities at the warehouse were not adequate;
- (2) Packaging requirements were not maintained for alarm panel instrumentation (Level "B" required);
- (3) Flammable materials were stored adjacent to safety related materials;
- (4) Open bags of calcium chloride were stored within ten feet of safety related stainless steel pipe;

- (5) Facilities for preparation and consumption of food and drinks were present in the warehouse storage area;
- (6) A reel of instrumentation cable (Level "C" storage marked on the reel) was found in the outside storage area;
- (7) The ends of partially used reels of electrical cable were not sealed;
- (8) Safety related cable reels, cable ends, and loops were in contact with the ground;
- (9) The laydown areas outside the warehouse were not fenced or otherwise controlled. Access control to the main warehouse was not present;
- (10) A newly acquired fork lift (Pettybone Serial No. 0731) had not been certified by the manufacturer for the maximum load to be handled and no "load plate" was found on the fork lift;
- (11) No inspection program had been established for warehouse material handling equipment;
- (12) Some stainless steel pipe was stored without plastic caps or other protective measures;
- (13) Several QC "Accept" tags were weathered and deteriorated and were not able to be identified to the specific material stored in outdoor laydown yards;
- (14) Trash and small scrap pieces of cable were scattered around the safety related cable storage area. Weeds were growing around the cable reels;
- (15) Safety related materials and components were found on pallets in the warehouse, but in some cases were not clearly identified or packaged properly;
- (16) Nuclear instrumentation components, requiring Level "A" storage, were found in the original shipping crates, but were not packaged and protected as required;
- (17) Flexitalic gasket materials, requiring Level "B" packaging and storage, were found exposed to dust and dirt. Some damaged gaskets were found;
- (18) The floor of the warehouse was not sealed to minimize generation of concrete dust, and
- (19) The uncontrolled laydown area outside of the warehouse was not adequately drained. Standing water was observed.

- e. Administrative Procedure 1805.00 requires approved procedures to be inserted into controlled copies of the procedures manual.

Administrative Procedure AD 1805.02 specifies that maintenance that can affect the performance of safety related equipment should be properly preplanned in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

Technical Specifications 6.8.2 and 6.8.3 require that each procedure of 6.8.1 above shall be reviewed by the SRB and Station Superintendent prior to the implementation and that temporary modifications to procedures be reviewed within 14 days of implementation.

Contrary to the above:

- (1) Maintenance instructions and vendor manuals used for routine safety related maintenance activities that are beyond the skill of the crafts were not reviewed by SRB,
- (2) Procedures used by contractors doing safety related work activities were not reviewed by SRB,
- (3) The Control Room Procedures File did not have all the safety related procedures required,
- (4) The latest temporary changes to procedures were not included in the Control Room Procedure File,
- (5) Temporary changes not shown in the Test and Procedures Index were present in the Control Room File, and
- (6) Temporary changes to procedures had not been reviewed by SRB or approved by Station Superintendent within 14 days of implementation.

These examples constitute a Severity Level V violation (Supplement I).

Response: a. Repairmen and servicemen have received, or will receive, the training required by AD 1828.11 in 1981. AD 1828.11 is also being revised to be more reflective of current training needs and to ensure that requisite training is achieved.

- b. An inspection of the storage and documents specifying storage requirements, for all nuclear safety related material in the warehouse, is being conducted. Additionally, only persons designated in writing to do so, are now authorized to sign General Material Inspection Checklists for the Davis-Besse station. The storage level required for the detector in question has been determined to be appropriate.
- c. Corrected. No response required.
- d. In the area of material handling and storage two basic areas of concern existed and have been addressed. An adequate number of qualified personnel have been provided and the storage facilities have been upgraded. In addition hoisting equipment is properly labeled with respect to maximum load to be handled.

The appropriate, qualified manning is being arranged by contractual support. As Toledo Edison people become available, with the proper training and qualification, contractual support will be phased out.

The specific items shown above have been corrected or are in the process of being corrected. In addition the storage facility has been upgraded to the extent that storage facilities for all classes of material are adequate. This upgrading includes training of personnel in material control and is a part of the overall approach discussed in Toledo Edison's letter Serial Number 694 of March 6, 1981. NRC (Washington, D.C.) letter of April 23, 1981 (Subject: Response to Management Inspection 50-3461/80-3 (PAS)) also addresses this subject.

- e. Where vendor's technical or maintenance instructions are used as part of a nuclear safety related maintenance procedure, the vendor material will be submitted for the review and approval by the SRB. Also, when a contractor (under Toledo Edison's QA program) is to use his own procedure to conduct nuclear safety related activities, the procedure will be reviewed by the SRB.

An individual has been assigned to each shift team for administrative duties. These technically trained individuals now have responsibility for keeping the procedures manuals which are used in the Control Room, up to date.

This will correct past deficiencies and ensure future compliance.

NOTICE OF DEVIATION

Toledo Edison Company

Docket No. 50-346

Based on the results of the NRC inspection conducted on October 27-31, November 1, 3-7, 17-21, 1980, certain of your activities appear to deviate from your commitment to the commission and have safety significance as indicated below:

FSAR Section 17.2.2.2.1 states, "The Administrative Procedures for each NSR (Nuclear Safety Related) activity as listed in Appendix 13C must be reviewed and approved by QA."

Procedure AD 1805.00, "Procedure Preparation and Maintenance," is listed in FSAR Appendix 13C.

Contrary to the above, AD 1805.00, "Procedure Preparation and Maintenance," was not reviewed or approved by QA.

Response: AD 1805 will be submitted for QA review and approval.

Note: Item 1 in Appendix B to the NRC letter is nuclear security related. The item has been corrected and therefore no response is required.

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