



Docket No. 50-346
License No. NPF-3
Serial No. 1043
July 16, 1984

RICHARD P. CROUSE
Vice President
Nuclear
(419) 258-5221

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz
Operating Reactor Branch No. 4
Division of Operating Reactors
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Stolz:

Toledo Edison is pleased to submit the attached "Integrated Living Schedule Program Plan for the Davis-Besse Nuclear Power Station" to the Nuclear Regulatory Commission (NRC) for approval. As you are aware, Toledo Edison has been developing the systems and internalizing the processes associated with the Integrated Living Schedule Program (ILSP) since early in 1983. We have had several meetings with NRC personnel to discuss our approach to the ILSP and have also provided you with written status reports and the "Draft Plan" (i.e., May 10, 1983, Serial No. 940; July 18, 1983, Serial No. 964, September 20, 1983, Serial No. 989, and January 20, 1984, Serial No. 996).

The attached plan documents the ILSP process that TED proposes to implement in conjunction with the NRC. We feel certain that this process will allow TED and the NRC to; 1) optimize the allocation of TED and NRC resources among those activities necessary to assure the continued safe, reliable and economic operation of Davis-Besse; and, 2) achieve the appropriate balance and prioritization between TED initiated activities and NRC required activities, thereby providing a rational basis for planning, scheduling and implementing necessary plant betterment projects at the Davis-Besse Nuclear Power Station.

The ILSP represents a major area of activity in our Performance Enhancement Program (PEP). In this regard, we believe that significant progress has been made towards internalizing the ILSP process into our normal business practices. However, we recognize that the fully effective program we intend to have is still evolving. Therefore, as part of our PEP activities we will be identifying a specific action plan to improve upon the effectiveness of our implementation of the ILSP process. Improvements in implementation effectiveness should not alter the basic concepts identified in the attached plan. However, we will continue to keep you informed of the status of our PEP activities pertinent to the ILSP.

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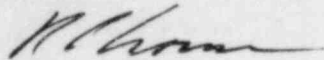
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Comments from our meeting on March 27 with Mr. A. W. DeAgazio have been incorporated into the attached plan. We believe you will find the attached plan acceptable and consistent with the NRC's concept of the Integrated Living Schedule Program.

The formal request for the Davis-Besse Operating License Amendment on the ILSP Plan is being mailed under separate cover. (Reference TED Serial No. 1061.)

Very truly yours,



RPC:MF:DBI:lrh
Attachment

cc: DB-1 NRC Resident Inspector

TOLEDO EDISON COMPANY - DAVIS-BESSE NUCLEAR POWER STATION

INTEGRATED LIVING SCHEDULE PROGRAM PLAN

I. Introduction

A. Purpose

Toledo Edison Company (TED) determined that the effectiveness of the overall management of its Nuclear Mission would be enhanced if its budgeting, project management,¹ planning and scheduling activities for Plant improvement or modification ("Plant betterment") projects/issues were combined into a single integrated program. This integrated program has been designated as the "Integrated Living Schedule Program" (ILSP).

The purpose of this "Plan" is to establish, within the ILSP framework, a rational basis upon which TED and the United States Nuclear Regulatory Commission (NRC) will fulfill specific responsibilities as related to the Davis-Besse Nuclear Power Station (Davis-Besse).

B. Objectives

The primary objectives of the ILSP Plan are:

- 1) To optimize the allocation of TED and NRC resources among those activities necessary to assure safe, reliable and economic operation of Davis-Besse.
- 2) To achieve the appropriate balance and prioritization between TED initiated activities and NRC required activities, thereby providing a defensible and consistent basis for planning, scheduling and implementing necessary plant betterment projects at Davis-Besse.

C. Plan Content

This Plan contains four (4) sections as identified below:

Section I - Presents the purpose, objectives and content for the Plan.

¹ Project Management includes Nuclear Facility Engineering, Material Management, Nuclear Projects, Station Management, Licensing, Quality Assurance, Nuclear Safety and Security.

- Section II - Describes the ILSP as it is being implemented by TED.
- Section III - Identifies the "schedules" that will be generated by TED as part of the ILSP process. This Section also specifies the process and responsibilities of TED and the NRC with regard to modifications of the "schedules".
- Section IV - Specifies the basis for TED and NRC implementation and enforcement of this Plan.

II. Description of TED Program

A. General

The ILSP process has been incorporated by TED into the normal management activities of the Nuclear Mission. In this regard, TED has defined the ILSP as stated below:

The Integrated Living Schedule program optimizes the implementation of plant betterment activities to best use the limited resources of both the NRC and TED. By utilizing a rational process of identifying, integrating, prioritizing, planning and scheduling plant betterment activities, considering safety, regulatory, reliability, operability and economic factors as well as financial, hardware and human constraints, it optimizes the allocation of resources for assuring the safe, reliable, economic operation of Davis-Besse.

Figure 1 shows a simplified flow diagram of the ILSP process. The activities shown on Figure 1 can be separated into functional areas of: 1) Issue/project evaluation; 2) Prioritization activities; 3) Planning and Scheduling; and 4) Implementation.

While each of these functions were always a part of TED's management activities, the integration of these functions into a single coherent program makes the effectiveness of the whole program greater than the sum of the parts. This plan addresses such an integrated program.

Considering the functional areas of activity in a general way, issue/project evaluation includes those activities associated with performing conceptual engineering, economic and safety assessments of both NRC and TED identified issues (plant betterment projects).

An important aspect of the issue/project evaluation function is the "technical" integration that takes place during these activities. Basically, technical integration entails determining how issues or projects affect each other and defining whether combinations of issues or projects could reduce the scope of planned activities and result in an improved plant design.

Prioritization activities are a critical component of TED's ILSP. These activities are intended to provide a consistent and appropriate basis for planning and scheduling the major plant betterment projects recognizing a set of appropriate prioritization factors (e.g., safety, reliability, economics, etc.).

The planning and scheduling function includes those activities required to produce a comprehensive, prioritized and resource loaded schedule of plant betterment projects determined by TED to be applicable to Davis-Besse. This function must be capable of accommodating the output of the prioritization activities as well as to rationally impose the resource and other practical constraints that govern TED's ability to perform the plant betterment projects in the most cost-effective manner. Additionally, this function must have the capability to accommodate additions to and modifications of schedules.

The implementation portion of TED's - ILSP refers to the actual implementation of the plant betterment projects and to the use of the ILSP in the management of TED's budget process.

B. TED Program

1. ILSP Management -

Implementation of the ILSP process at TED involves each Division in the Nuclear Mission (See Figure 2) and has resulted in the modification to TED-Nuclear Mission procedures and policies to formally internalize the program. While the Vice President, Nuclear is ultimately responsible for the program, day-to-day responsibility for assuring that the program is functioning has been assigned to the Davis-Besse Work Scope Committee (DBWSC).

The DBWSC is composed of at least four members including as a minimum the Station Superintendent and the Directors responsible for Engineering, Licensing and Nuclear Projects. The DBWSC is responsible for directing the preparation of the overall ILSP schedule and to review proposed changes to schedules developed through the ILSP, recommending to the Vice President, Nuclear what action should be taken. The DBWSC is also the management entity responsible for recommending the annual capital budget projects and major

operation and maintenance projects to the Vice President, Nuclear. In essence, the DBWSC represents a senior management committee providing an overview and centralized management of the ILSP.

2. Issue/Project Evaluation

TED utilizes a "Facility Change Request" (FCR) process that involves the preparation of an FCR for proposed plant betterment projects. In addition, Summary Level Planning Worksheets (SLPW) can be developed to evaluate projects/issues. The FCR and SLPW process includes preparation and review of documentation supporting the need for the FCR (capital and major maintenance FCR's) and the evaluation of alternatives for addressing the specific issue. As part of TED's formal FCR process, required safety reviews, safety evaluations and assessments are also performed. TED will modify, or develop procedures to integrate the activities of the FCR process into the ILSP. In addition, as discussed subsequently, TED has supplemented the existing FCR review process with specific activities in the ILSP process that are intended to achieve "technical integration" and improve the planning and scheduling input data. This extension of the FCR process and its coordination with the ILSP, forms an integrated system of TED resource management directed at improved plant safety and performance.

3. Prioritization

The prioritization function has been developed as part of the evolution of the ILSP process at TED. In this regard, TED considers the prioritization process to be dynamic and expects to make improvements to the process as better information (e.g., plant specific reliability models) and improved methodologies become available.

The prioritization activities are performed under the auspices of the DBWSC. Specifically, a "Prioritization Subcommittee" reporting directly to and guided by the DBWSC has been established. The subcommittee is composed of designated individuals from the Station and the Nuclear Safety, Nuclear Projects, Nuclear Facility Engineering Divisions identified on Figure 2, except Quality Assurance. Individuals are assigned to the subcommittee by the DBWSC. In making such assignments, the DBWSC assures that a broad spectrum of expertise and experience is represented on the subcommittee. Additions or changes to the subcommittees membership can be made on a permanent, or temporary basis as deemed necessary by the DBWSC. It should be emphasized that a specific intent of the committee concept is to establish a broad-based highly experienced team that will perform the prioritization function in a consistent rational and defensible manner.

Applicable issues and plant betterment projects being considered for inclusion in the ILSP are prioritized by the subcommittee with respect to the following prioritization factors:

- 1) Nuclear Safety
- 2) Plant Reliability/Availability
- 3) Personnel Safety
- 4) Regulatory Significance
- 5) Economics/Practicality

The subcommittee assigns a priority designation to each issue/project for each of the prioritization factors identified above. Specific criteria are predetermined for each prioritization factor to guide the deliberations of the subcommittee.

In summary, the prioritization process is accomplished using identified criteria within the framework of a formal process that utilizes a highly qualified and experienced group of individuals.

In addition to the prioritization function, the subcommittee also provides a forum for overiewing the validated* SLPW's for each project and for identifying opportunities for better technical integration among issues/projects.

* NOTE: A validated SLPW is one which has been reviewed and signed off by each cognizant individual/department indicating the plan is valid based on the available data and project assumptions.

4. Planning and Scheduling

TED utilizes a Project/2 computerized planning and scheduling system. The planning and scheduling function is performed under the direction of the Nuclear Projects Division.

Figure 3 illustrates the basic summary level planning information that is input to the system. Project/2 has the capability to plan and appropriately schedule multiple projects and activities considering the relative priorities of the projects and allowing the imposition of planning constraints. In this regard, as part of the planning process, the DBWSC can identify constraints (e.g., number of crafts onsite, maximum number of workers in an area, etc.) that are input to the planning and scheduling activities to achieve a realistic output of what can be accomplished over a specific time period (e.g., budget year, planned outage period, etc.).

TED updates the Project/2 system information on a regular basis to manage the implementation of projects and to identify schedule problems, or opportunities to accomplish additional activities. The status of the activities are regularly reported to the DBWSC by the Nuclear Projects Division with recommendation of actions that the DBWSC should consider taking. This process allows TED to make appropriate changes to project schedules when they are affected by activities such as unscheduled outages, strikes, delays in procurement or installation, modifications to fuel-cycle schedules.

5. Implementation

The implementation function of the ILSP involves both the actual implementation of the projects included in the schedule and the relationship of the ILSP process to TED's annual budgeting process.

First, with respect to the actual implementation of capital projects included in the schedule, TED has established a formal project management process that resides with the Nuclear Projects Division. Each project is assigned to a specific project coordinator who reports to a designated project manager. The status of discrete activities (e.g., engineering, equipment status, construction, etc.) are monitored relative to the Project/2 planning networks by the project coordinator and reported to the project manager. Regularly scheduled project status reports are issued and as stated previously, the DBWSC is notified of circumstances that could affect the adopted ILSP "schedule".

The utilization of a formal project management process that has available the comprehensive planning and scheduling information provided by the Project/2 system, yields a high degree of confidence that the planned projects will be accomplished in accordance with TED's ILSP commitments.

A second area of ILSP implementation that should be acknowledged in this Plan relates to the development of budgets. Capital, operations and maintenance budget items must be approved by the TED Board of Directors prior to expenditure of funds for the projects.*

*NOTE: The TED budget cycle for Operations & Maintenance expenses begins in August each year and ends with the Board of Directors approval of the budget, typically the 4th Tuesday in December. The annual capital budget cycle also ends with the December Board of Directors Meeting, but begins in June. However, due to the dynamics of the ILSP process, TED is currently evaluating a more frequent capital budget review which would provide a mechanism for "Implementation Schedule"

baseline modification, as necessary. The "Implementation Schedule" baseline modifications would reflect changes to project cost and schedule completion, based on the conceptual design, design, procurement and outage non-outage implementation plans or progress. As resources become available to accomplish the higher priority jobs in the "Long Range Plan" (See Section III A for definition of the "Long Range Plan"), projects will be integrated from the "Long Range Plan" into the "Implementation Schedule" on a priority basis.

Therefore, at the beginning of the budget approval process, the DBWSC supported by the Prioritization Subcommittee and the Nuclear Projects Division prepares a recommended budget, based upon the ILSP process, and submits it to the Vice President, Nuclear. The actual implementation of the ILSP recommended activities cannot be initiated until the TED Board of Directors approves the recommended budget. Furthermore, if changes (i.e., cost increases, or the addition of new projects) are made to the ILSP recommended projects (See Section III) subsequent to the approval of the budget, approval of the modified budget must be obtained.

III. Schedule Identification and Modification

A. Schedule Identification -

The basic output of the TED-ILSP process will be a schedule that has rationally planned and prioritized applicable plant betterment activities as identified by TED, or required by the NRC and other agencies (i.e., INPO, FAA, OSHA, etc.). In this regard, TED has determined that this schedule will be comprised of two components, designated as the "Implementation Schedule" (IS) and the "Long Range Plan" (LRP).

Essentially TED has divided the overall schedule into two components to explicitly recognize the differences between budgeted projects (IS) to which funds have been committed and unbudgeted projects (LRP) that are available for funding in the following budget years unless a situation warrants a change during the current budget year.

The IS will include capital and major Operations and Maintenance projects approved by the TED Board of Directors in the current years budget. TED will present bar chart schedules extending over the estimated full duration for each of the projects. The LRP will identify known, but currently unbudgeted capital and major Operations and Maintenance activities as in the IS, projects included in the LRP will have projected schedules that extend over the full duration of the project. However, since LRP projects are by definition not budgeted in the current year, the earliest "start" date for the project would be January 1 of the following year. As stated previously (Section II.B.4), the level of confidence regarding the scheduled completion dates for

projects included in both the IS and LRP will be directly related to the amount of conceptual and/or detailed engineering completed at the time the SLPW is prepared. In this regard, consistent with the II.B.4 discussion, TED will indicate the schedule completion confidence level for each of the projects included on the IS and LRP.

Included in both the Implementation Schedule and the Long Range Plan will be a variety of plant betterment activities, which from a regulatory perspective, have differing significance. In recognition of this fact, the types of activities that may be included have been categorized as follows:

- 1) Category A - Activities that have implementation dates mandated by NRC rules, orders or license conditions.
- 2) Category B - Davis-Besse specific NRC requirements that are not in Category A, but have been budgeted and included in the Implementation Schedule.
- 3) Category C - TED identified plant betterment activities that are included in the Implementation Schedule or Long Range Plan.
- 4) Category D - Davis-Besse specific NRC requirements that are not budgeted, but are included in the Long Range Plan.

B. Schedule Modifications

1. General

An important aspect of TED's-ILSP process is the recognition that the Implementation Schedule and Long Range Plan will need to be modified at times; to reflect changes in regulatory requirements, to accommodate additional TED identified plant betterment projects; or, to reflect delays resulting from events beyond TED's control. Therefore, it is necessary for this plan to identify the process by which such schedule modifications will occur and the explicit responsibilities of both TED and the NRC regarding such changes.

As described previously, TED has centralized the management of the ILSP with the DBWSC and will be regularly monitoring the status of the ILSP schedule and plan through its internal project management process. Therefore, in the event delays to scheduled activities occur, the DBWSC will be aware of the situation and will be responsible to assure that the appropriate actions, are taken.

These actions include:

1. Compensatory actions to achieve completion of the delayed project;
2. Accelerating completion of other budgeted project;
3. Recommending incorporation of projects from the long range plan into the budgeted implementation schedule;
4. No changes to any projects except for the delayed project;
5. Some combination of the previously stated actions. Furthermore, as noted in Section III.B.2, opportunity exists for the NRC and TED to discuss schedule changes for projects considered significant from a regulatory and/or safety perspective, or other projects which impact the completion of projects significant to regulatory/safety perspective.

With regard to the incorporation of a new (or revised) regulatory requirement, or new (or revised) TED plant betterment activity, TED will address the new (or revised) activity consistent with its ILSP process. Specifically, upon completion of the necessary evaluations and documentation, the new activity will 1) be submitted to the prioritization subcommittee for action; 2) incorporated, based upon its priority designations, into the Implementation Schedule, or Long Range Plan. If the activity is determined to be an Implementation Schedule item, the Nuclear Projects Division will inform the DBWSC of whether it can be accomplished without exceeding the currently approved budget, what additional budget may be required, or what planned projects could be rescheduled to allow the new activity to be performed in light of the adopted planning constraints. If the new activity is determined to be a Long Range Plan item, the Nuclear Facility Engineering Division will incorporate the project into the existing Long Range Plan. The DBWSC will recommend appropriate action to the Vice President, Nuclear and assure that the TED responsibilities are satisfied.

2. TED Responsibilities

TED has the following responsibilities regarding coordination with the NRC of modifications to the Implementation Schedule and the Long Range Plan:²

- a) Category A items - Scheduled completion dates for Category A items, whether on the Implementation Schedule or the Long Range Plan will be modified only upon receipt of prior approval from the NRC, in accordance with applicable NRC regulations.

TED will inform the NRC Project Manager for Davis-Besse when serious consideration is being given to requesting a change in the completion dates³ for Category A items.

- b) Category B items - TED will inform its NRR Project Manager when a change is made to the scheduled completion date for a Category B item. TED will provide the NRC with written notification of a change including the basis for the change and any compensatory action initiated.

NRC may request further explanation, or discussion concerning such changes. In this event, discussions will be initiated with the NRR Project Manager. However, all changes in Category B scheduled completion dates will be effective 30 days following written notification to the NRR Project Manager and will remain so unless subsequently modified as a result of mutual discussions between the NRC and TED. TED will be prepared to discuss the nature of the proposed changes, the impact of the proposed change on other "Implementation Schedule" projects and re-evaluation of any projects previously decelerated.

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- ² The Implementation Schedule and the Long Range Plan will contain sufficient detail to identify those items with completion dates keyed to fuel cycle (planned) outages. For such items, a change in outage period shall not be considered a schedule modification. In addition, for items in the Implementation Schedule and Long Range Plan, changes to project completion dates prior to completion of design shall not be considered a schedule modification.
- ³ For purposes of responsibility discussions in this Plan, changes to scheduled dates for intermediate activities (SLPW Activities 1-6) that do not jeopardize, or change the scheduled completion date (SLPW Activity 7), do not require prior NRC approval, or notification. Activity 7 is called turnover and test. When Activity 7 is completed, TED considers implementation complete (system declared operational); startup & test complete; new procedures developed, approved; operator training complete and DCN's available on drawings. All completion dates given by TED on the Implementation Schedule (IS) and Long Range Plan (LRP) represent the projected date for completion of SLPW Activity 7. It should be noted that TED considers punch list items and final document closeout (SLPW Activity 8) to occur after project completion. Closeout is typically scheduled over a six-month period following the completion of Activity 7.

- c) Category C items - As part of the semi-annual update of the Implementation Schedule and Long Range Plan (See Section IV), TED will advise NRC of changes to Category C items. With the exception of the situation indicated below, prior notification to the NRR Project Manager of changes to items in this category will not be required.

If, however, TED modifies a Category C Implementation Schedule item completion date that was previously the basis for modifying the completion date for a Category A item, TED will provide the NRC with written notification of the change. The written notification will include the basis for the change and any compensatory action initiated. All changes in these type Category C schedule completion dates will be effective 30 days following written notification to the NRR Project Manager and will remain so unless subsequently modified as a result of mutual discussions with the NRC and TED. TED will be prepared to discuss the nature of the proposed changes, the impact of the proposed change on other "Implementation Schedule" projects and re-evaluation of any projects previously decelerated.

- d) Category D items - as part of the semi-annual update of the Long Range Plan (See Section IV), TED will advise the NRC of changes to Category D items. All changes to Category D scheduled completion dates will be effective 30 days following the quarterly update notification to the NRR Project Manager and will remain so unless subsequently modified as a result of mutual discussions with the NRC and TED.

3. NRC Responsibilities

It is recognized that formal NRC regulatory actions may: 1) impose a new regulatory requirement with a fixed date; or 2) establish a firm date for a previously identified regulatory requirement. In addition, the NRC may identify new regulatory issues that could ultimately be determined to be plant specific to Davis-Besse requiring plant modifications, procedural change, or staffing changes.

In taking any of the actions identified above, the NRC, to the extent consistent with its' overall regulatory responsibilities and, unless public health or safety require otherwise, will recognize TED's ILSP process as set forth in this Plan. Specifically, to the extent possible, the NRC will not specify completion dates, but will request TED to incorporate the "new" requirement into its ILSP process and to respond to the NRC regarding completion of the requirement consistent with its priority relative to the items already in the Implementation Schedule and Long Range Plan.

For new items deemed by the NRC to be significant enough to warrant inclusion in the then existing Implementation Schedule, the NRC shall request a response from TED within 60⁴ days. This response shall identify the proposed completion date for the activity, the basis for that date, the impact on the Implementation Schedule and any compensatory actions TED proposes to initiate. TED shall also specify the latest date for receipt of NRC concurrence that would still allow the proposed schedule to be met. If the NRR Project Manager does not agree with the TED new or revised project completion dates, he/she shall inform TED of the disagreement and basis therefore, within 30 days of the date of the information from TED. Upon said notification TED and the NRC will negotiate mutually agreeable completion dates.

For new regulatory items considered by the NRC to be applicable for inclusion in the Long Range Plan, TED shall inform the NRC of the Proposed schedule as part of the semi-annual update (See Section IV).

In making judgments concerning whether a new requirement should be considered to be included in the Implementation Schedule, or Long Range Plan, the NRC will maintain cognizance of the activities TED has already committed to accomplish, the timing relative to budget cycle and outage schedule when the new requirement is being imposed and the responsibilities of the NRC as mandated by the Atomic Energy Act and the Energy Reorganization Act.

⁴ It is mutually understood that the desirable response time to commit to a completion date is 60 days, but a minimum extension of 30 days shall be granted by the NRC to TED upon the receipt of an extension request from TED. The request shall identify the reason(s) and time required to produce and commit, to a reasonable completion date. It is further understood that the requested response time and the extensions granted shall be in accordance with the applicable sections of the Code of Federal Regulations.

IV. Program Implementation and Enforcement

A. Responsibility -

The primary TED interface with the NRC regarding this Plan and its implementation will be the Nuclear Licensing Manager.

The primary NRC interface with TED regarding this Plan and its implementation will be the NRR Project Manager for Davis-Besse.

TED will copy both the Director, Division of Engineering and Technical Programs in Region III and the Site Resident Inspector on correspondence relevant to the Plan. However, for purposes of consistency and accountability, the imposition of new NRC regulatory requirements that are to be considered for inclusion in the ILSP - Implementation Schedule, or Long Range Plan shall be formally submitted to TED through NRC Headquarters.

B. Schedule Enforcement -

Neither the Implementation Schedule nor the Long Range Plan are considered to be formal parts of this Plan, or associated license amendment. However, consistent with applicable NRC regulations, Category A items represent formal regulatory commitments. In addition, consistent with the provisions of Section III - B.2 of this Plan, for Category B items and specific Category C items TED is required to notify NRC of completion schedule changes thereto. In this regard, enforcement of these schedule commitments under applicable NRC requirements* should be consistent with the provisions of the Plan and apply to completion dates only, and not to intermediate activity schedule dates.

*NOTE: It is mutually understood that scheduling does not fall under the licensee's QA Program and therefore is not applicable to Appendix B. An audit by the NRC should be limited to identification that the schedules for the TED ILSP Plan exist and that the supporting correspondence for changes to the schedule is maintained.

On a semi-annual basis, commencing approximately six (6) months following approval of this Plan, TED will update the Implementation Schedule and Long-Range Plan and advise NRC of their status. Specifically, TED will:

- ° Summarize progress in implementation of Category A and B projects.
- ° If applicable, summarize the reasons for schedule changes associated with Category A and B projects.
- ° Identify item or completion date changes to the Implementation Schedule and Long-Range Plan since the last update.

C. Plan Modification

The licensee and the NRC recognize that the Plan itself may require further modification. Accordingly, TED will perform the necessary reviews, consistent with NRC regulations, associated with proposed plan modifications and if determined necessary will submit a license amendment application to the NRC for approval of the proposed changes. In such cases, the changes will be made effective upon amendment issuance by the NRC.

Figure 1

Toledo Edison Company
INTEGRATED LIVING SCHEDULE PROGRAM
Simplified Process Flow

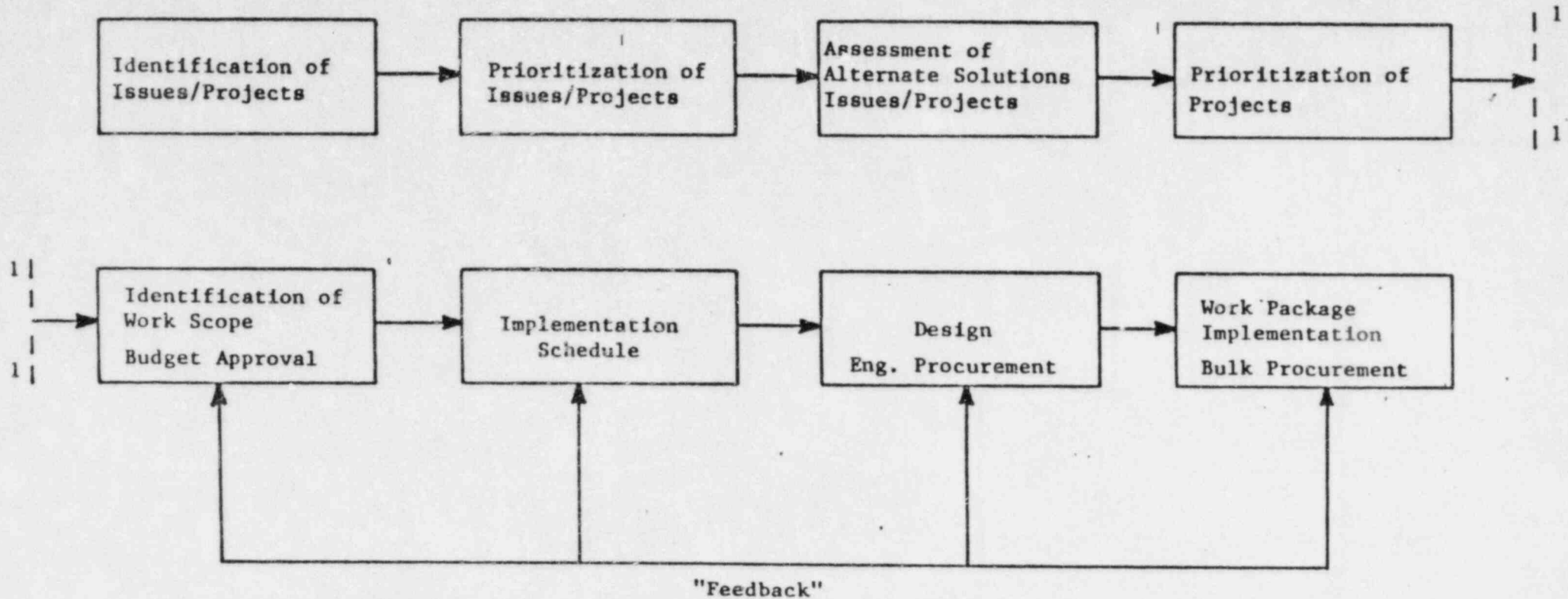
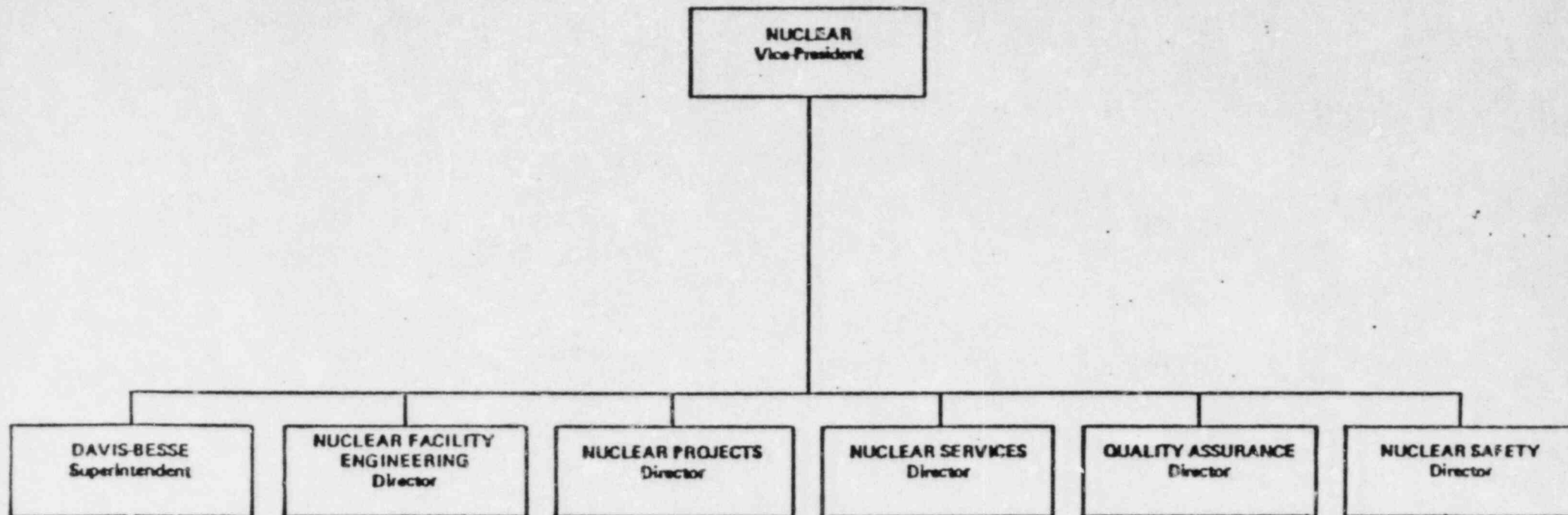


FIGURE 2

TOLEDO EDISON COMPANY - NUCLEAR MISSION ORGANIZATION CHART



ACTIVITY NO's.

1

STUDY AND CONCEP. ENG.	% COMPLETE _____	DURATION WKS _____
BPC _____	MHS _____	
TED _____		
OTHER _____		

FIGURE 3

Serial No. 1043

July 16, 1984

TOLEDO EDISON COMPANY

ILSP -

AND SCHEDULING INPUT INFORMATION

2

DESIGN ENG.	% COMPLETE _____	DURATION WKS _____
BPC _____	MHS _____	
TED _____		
OTHERS _____		

3

LONG LEAD MATERIALS	% COMPLETE _____	DURATION WKS _____
BPC _____	MHS _____	
TED _____		
OTHERS _____		

4

BULK MAT'S	% COMPLETE _____	DURATION WKS _____
BPC _____	MHS _____	
TED _____		
OTHERS _____		

5

NON OUT. IMPLEM.	% COMPLETE _____	DURATION WKS _____
MOD. ELEC. _____	MHS _____	
PIPE F. _____		
OTHER _____		
BPC FCN ALL _____		
TED SUPPORT _____		

6

OUTAGE IMPLEM.	% COMPLETE _____	DURATION WKS _____
MOD. ELEC. _____	MHS _____	
PIPE F. _____		
OTHER _____		
BPC FCN ALL _____		
TED SUPPORT _____		

7

TURNOVER & TEST	% COMPLETE _____	DURATION WKS _____
L & C. _____	MHS _____	
ELEC. _____		
OTHER _____		

8

DOCUMENT CLOSEOUT	% COMPLETE _____	DURATION WKS _____
BPC _____	MHS _____	
TED _____		

PROJECT ASSUMPTIONS: _____

CONSTRAINTS: _____