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Docket Number 50-346

License Number NPF-3

Serial Number 1-1080

August 23, 1995

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Subject: Response to Inspection Report 50-346/95005

Gentlemen:

Toledo Edison has received Inspection Report 95005 (Log Number 1-3595) and the enclosed Notice of Violation; the response to which is provided below.

Reply to a Notice of Violation (346/95005-03(DRP))

Alleged Violation

10 CFR Part 50, Appendix B, Criterion V, states, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings... and shall be accomplished in accordance with these instructions, procedures, or drawings."

Administrative procedure DB-MN-00001, Conduct of Maintenance, Section 6.5.4.f.1 specified that "Personnel performing maintenance tasks shall ensure they have the proper tools and approved consumables to do the task correctly and safely."

Administrative procedure DB-MN-00001 also specified in Section 6.9.3.a that "Procurement of supplies and equipment for maintenance shall be performed in accordance with... NG-HS-00505, Controlled Materials Program."

Administrative procedure NG-HS-00505 specified in Section 6.4.1 that "The requester (of approved controlled materials) shall review the Controlled Material Contaminant Evaluation (CMCE) and ensure that the approved product usage, category designation, and any restrictions are applicable to the proposed usage of the controlled material."

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Operating Companies
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Contrary to the above, on April 6-7, 1995, several controlled materials that were not approved for unrestricted use under the licensee's Controlled Materials Program were found stored in the auxiliary building and/or in use during maintenance activities without any restrictions placed on their use.

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

Toledo Edison Response

1. Reason for the Violation.

Initial concerns regarding the inadequate control of consumable materials were documented by the Nuclear Regulatory Commission (NRC) in Inspection Report (IR) 95004 dated May 15, 1995, as an unresolved item (URI 346/95004-01). The discussion of this issue in IR 95004 identified several consumable materials that were stored and/or in use in the auxiliary building, but had not been approved for unrestricted use in accordance with the Davis-Besse Controlled Materials Program.

The cause of this violation was inadequate knowledge of maintenance personnel regarding the requirements of procedure NG-HS-00505, Controlled Materials Program, as they apply to the Controlled Materials Contaminant Evaluation (CMCE) Index. The CMCE Index identifies controlled consumable materials which have been evaluated and characterized for use on and/or in various plant systems.

A contributing factor to this violation was that training of maintenance personnel regarding the use of the CMCE Index was not as detailed as necessary. In addition, NG-HS-00505 is cumbersome, contains minor inaccuracies, and lacks adequate interface with other station procedures.

2. Corrective Actions Taken and Results Achieved

Potential Condition Adverse to Quality Report (PCAQR) 95-0296 was initiated on April 7, 1995, to document the inadequate control of consumable materials.

The suspect materials were immediately removed from their storage locations and a notice was issued temporarily banning the use and issue of these specific consumable materials. In addition, signs were posted at the tool rooms informing employees of their responsibilities regarding consumable material verification prior to use.

A memorandum was issued by the Superintendent - Mechanical Maintenance on April 28, 1995, which discussed compliance with the requirements of the Controlled Materials Program and the CMCE Index. Required reading of this memorandum was completed by appropriate station personnel on May 30, 1995.

A Quality Assessment surveillance of the Controlled Materials Program was conducted April 25 through May 18, 1995 (SR-95-ENVMG-01). One finding report was issued which documented Controlled Materials Program discrepancies identified during the surveillance. Additional discrepancies associated with approved consumable materials listed in maintenance procedures were incorporated into PCAQR 95-0296.

3. Corrective Actions to Prevent Recurrence

The Continuing Training Program for Maintenance personnel will be revised to provide more detail regarding the use and requirements of the CMCE Index. Initial training of Maintenance personnel will be completed by October 30, 1995.

Enhancements to the Controlled Materials Program are in progress. These enhancements include reduction in scope, process simplification, improved user compatibility and improved interface with other station procedures. The program discrepancies identified in SR-95-ENVMG-01, including those incorporated into PCAQR 95-0296, are being pursued in concert with this effort. Revision of the Controlled Materials Program will be completed by December 15, 1995.

4. Date When Full Compliance Will Be Achieved.

Full compliance was achieved on April 7, 1995, when the original suspect materials identified in PCAQR 95-0296 were removed from their storage locations in the auxiliary building and restricted from use and issue.

Should you have any questions or require additional information, please contact Mr. William T. O'Connor, Manager - Regulatory Affairs, at (419) 249-2366.

Very truly yours,



AVA/eld

cc: L. L. Gundrum, NRC Project Manager
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Utility Radiological Safety Board