

Docket No. 50-346

License No. NPF-3

Serial No. 1-452

July 23, 1984



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

Mr. C. E. Norelius, Director
Division of Project & Resident Programs
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Norelius:

Toledo Edison acknowledges receipt of your June 25, 1984 letter (Log No. 1-980), referencing your review of our response (Serial No. 1-412) and corrective actions taken on noncompliance item No. 1, identified in Inspection Report No. 50-346/83-24.

Your letter of June 25, 1984 acknowledged that respiratory training given was adequate, however, the training was not in accordance with the administrative framework of procedures and the Toledo Edison Nuclear Quality Assurance Manual.

Toledo Edison herein offers additional information regarding this item:

1. Violation: Technical Specification 6.8.1.a requires written procedures be established, implemented and maintained covering the activities referenced in Appendix "A" of Regulatory Guide 1.33, November, 1972.

Regulatory Guide 1.33, November, 1972, Appendix A Section 7.e(5) requires Radiation Protection Procedures be established, implemented, and maintained covering respiratory protection.

Health Physics Procedure HP 1605.02.11, Section 6.2.2.4, requires "Each individual certified to use respiratory protection equipment shall complete a refresher training session and be recertified annually."

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Contrary to the above, a maintenance individual was authorized to use respiratory equipment by Chemistry & Health Physics Department in mid-December of 1983 even though the individual's certification expired on October 26, 1983.

This is considered a Severity Level V violation.

Response: (1) Corrective action taken and results achieved.

Health Physics personnel have been instructed not to conduct any respiratory training. No respiratory training has been given by personnel outside of the Nuclear Training Department since December 20, 1983.

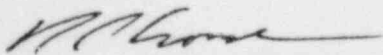
(2) Corrective action taken to avoid further noncompliance.

No respiratory training will be given by personnel outside of the Nuclear Training Department unless approved by the Nuclear Services Director, in accordance with procedure NSP/NT-003, Management of Mission Training Offered Outside Nuclear Training Department.

(3) The date when full compliance will be achieved.

Full compliance was achieved by May 1, 1984, with the implementation of NSP/NT-003. Additionally, all respiratory training has been given by the Nuclear Training Department since December 20, 1983.

Very truly yours,



RPC:DWB:SGW:nlf
cc: DB-1 NRC Resident Inspector