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Docket Number 50-346

License Number NPF-3

Serial Number 1-979

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United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Subject: Response to Initial Systematic Assessment of Licensee  
Performance (SALP) 9 Report (IR 91001)

Gentlemen:

Toledo Edison Company (TE) has reviewed the initial SALP 9 Report  
(Inspection Report No. 50-346/91001) for the Davis-Besse Nuclear Power  
Station, covering the period July 1, 1990 through November 30, 1991.

The SALP transmittal letter (Log Number 1-2601), dated February 5,  
1992, stated that TE may provide written comments to the NRC within 30  
days after the March 3, 1992, SALP 9 meeting.

Attached are TE's comments concerning the SALP 9 Report.

If you should have any questions regarding this matter, please contact  
Mr. E. W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,

KAF

Attachment

cc: A. B. Davis, Regional Administrator, NRC Region III  
J. B. Hopkins, NRC/NRR DB-1 Senior Project Manager  
W. Lewis, DB-1 NRC Senior Resident Inspector  
Utility Radiological Safety Board

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Operating Companies  
Cleveland Electric Illuminating  
Toledo Edison

TEHD

## RESPONSE TO INITIAL SALP 9 REPORT

### 1. ASME Code

On Page 12, in the Engineering/Technical Support (E/TS) analysis section (paragraph 2), the initial SALP report states: "The licensee's application of the American Society of Mechanical Engineer's (ASME) Code at times lacked thoroughness, most notably in an application dealing with steam generator tube plugging. In this case, an ASME Code relief focused on an automatic welding process without sufficient recognition of the unique plug and weld design. Misinterpretations of the ASME Code also were noted in the submittal of the licensee's second 10-year inservice testing program for pumps and valves."

As presented, this statement in the SALP Report incorrectly creates the perception of a general weakness in the understanding and thorough application of ASME Code requirements. The facts surrounding the examples provided in the SALP Report do not support the conclusion reached. In fact, activities accomplished during the SALP 9 period demonstrated a general strength in both understanding and application of ASME Code requirements.

An example of thorough ASME Code application during the SALP 9 period involved a proposed alternative to Section XI of the ASME Code. It involved inspections of the outside diameter weld surfaces of the core flood and reactor vessel nozzles. This effort by TE avoided at least 60 Rem anticipated from using the inspection techniques specified in the ASME Code.

Toledo Edison's commitment to proper interpretation and application of the ASME Code was exemplified by the formation of a Davis-Besse ASME Code Committee. This committee has been successful in reviewing and advising TE personnel/departments on ASME Code queries. In addition, TE has been active in obtaining and maintaining the National Board Inspection Nuclear Repair (NR), Valve Repair (VR), and Repair (R) Stamps for added Code compliance.

#### A. Steam Generator Tube Plug

Toledo Edison contracted ABB/Combustion Engineering (CE) to perform steam generator inspections and steam generator tube plug installations for the seventh refueling outage. In one steam generator tube location where a backup plug was required, a welded plug was specified because of insufficient clearance for a mechanical plug. During its review of CE's methodology for installation of the backup plug, TE identified that the automatic welding process for steam generator tube plugging is not sanctioned by Section XI of the 1986 edition of the ASME Code. Although the automatic welding process is sanctioned by the 1989 edition of the ASME Code, the NRC has not yet endorsed that edition.

Toledo Edison's attention to detail and Code knowledge was manifested in TE's request for relief from ASME Code Section XI to permit machine welding of steam generator plugs in a letter dated September 3, 1991 (Serial 1978).

Prior to submittal of the relief request, as part of its independent design verification process, TE reviewed the acceptability of the plug design specification. In addition, CE was requested to submit a letter of justification and a stress report for the proposed weld design and plug material INCO 82. Based on reviews of the ASME Code, the information supplied by CE, and the successful performance of the INCO 82 welded plug in other plants, TE concluded that the weld design and plug material were acceptable and in compliance with the 1986 edition of Section XI of the ASME Code. Since the only departure from ASME Code requirements was in the area of the automatic welding process, the relief request (Serial 1978) centered on the welding process; other technical information was not intended to be included.

Notwithstanding the above, the NRC's review of the relief request focused on the plug material and weld design. As a result, the NRC questioned CE's material selection and weld design of the backup plug. Follow-up information and test reports were sent to the NRC to support the use of INCO 82 with the proposed weld design in steam generator tube plugging applications.

The NRC accepted the automatic welding process, proposed plug material, and weld design in its Safety Evaluation Report (SER) dated October 31, 1992 (Log 3614). Although the plug material and weld design issues were resolved, the NRC requested information be provided by the end of the eighth refueling outage on long term corrosion of INCO 82 in steam generator tube plugging applications.

In conclusion, characterizing TE as having a lack of thoroughness based on the steam generator tube plugging issue is inappropriate. The SALP 9 final report should be revised to accurately characterize the issue.

B. 10 Year Inservice Testing (IST) Program

Toledo Edison submitted the second 10 year IST program on March 22, 1990. Toledo Edison identified areas where compliance with ASME Code requirements was considered impractical or burdensome. In these cases, relief was requested. The issue does not involve misinterpretation or omission of ASME Code requirements, it involves the adequacy of justification for Code relief. This is different than misinterpretation or omission. The final SALP 9 report should be revised to include this clarification.

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2. Engineering Staff Knowledge Deficiencies

On Page 13, in the E/TS analysis section (paragraph 1), the initial SALP report states: "Although some knowledge deficiencies were noted in the engineering department, the overall effectiveness of training in the engineering area...was good."

Based on statements made by the NRC at the SALP 9 meeting at Davis-Besse on March 3, 1992, it is TE's understanding that the final SALP 9 report will be revised to remove the reference to "knowledge deficiencies".