

DHB

Docket No. 50-346

License No. NPF-3

Serial No. 1-501

February 28, 1985



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

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

Dear Mr. Keppler:

Toledo Edison acknowledges receipt of your Inspection Report 50-346/85-02, dated January 30, 1985 (Log 1-1109), for the Davis-Besse Nuclear Power Station, Unit No. 1.

Attachment 1 to this letter provides our comments on the recommendations included in the Appendix to your inspection report. In some cases, our responses to your recommendations will duplicate those submitted in our response to the Systematic Assessment of Licensee Performance (SALP) (Serial 1-497, February 4, 1985). It will be noted when this is the case.

Should you have any questions concerning our comments, please contact Terry D. Murray, Assistant Vice President, Nuclear Operations.

Very truly yours,

R P Crouse

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cc: DB-1 NRC Resident Inspector

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ATTACHMENT 1

1. Recommendation: Establish a schedule for selecting and training a Lead Emergency Duty Officer (EDO).

Response: As identified in our SALP response (Serial 1-497 dated February 4, 1985), by March 15, 1985, a personnel requisition for a new Emergency Planning Supervisor/EDO will be approved. Shortly thereafter, the position will be posted internally and any qualified candidates interviewed. By April 15, 1985, Toledo Edison will have determined whether the new Emergency Planning Supervisor will be a current employee of the Company. A training schedule will be established within four weeks of the individual's assumption of the position.

However, in the event no qualified candidate is available in-house, Toledo Edison would need to hire from outside the current organization. In this case, recruiting and personnel availability would dictate the schedule. However, within four weeks of assuming the position of Emergency Planning Supervisor, a training schedule would be provided.

2. Recommendation: Include in the 1985 emergency preparedness exercise objective, a demonstration of both a Shift Supervisor and a Shift Technical Advisor (STA) functioning as interim EDO.

Response: The objectives for the 1985 annual emergency preparedness exercise will reflect the use of both the Shift Supervisor and the STA as an interim EDO, if this program is to be implemented before the July, 1985 exercise. If the program implementation is delayed, then it will not be used during the exercise and no such objective will appear in the 75-day submittal, due to the Nuclear Regulatory Commission (NRC) on May 1, 1985.

3. Recommendation: Develop and implement an action plan for reducing the use of consultants for providing specialized emergency preparedness training.

Response: A plan for the reorganization of the Emergency Planning Group has been submitted to Senior Management for approval. This reorganization calls for a technical upgrade of the Emergency Planning Supervisor position and the addition of a technical Onsite Emergency Planner. After these positions are approved and filled, an action plan will be developed for the implementation of emergency preparedness training taught by the Toledo Edison Emergency Planning Staff and the phasing out of general consultant teaching support.

4. Recommendation: Hire one or more qualified instructors to coordinate and administer post-1985 specialized emergency preparedness training. Assign such personnel to Nuclear Training rather than Nuclear Services.

Response: The proposed reorganization of the Emergency Planning Group (see No. 3 above), identifies that the Emergency Planning Supervisor and Onsite Emergency Planner will assume teaching duties for a portion of the emergency plan training program.

Due to the Nuclear Training Department's near term effort to meet the INPO accreditation goals, it is not preparing to assume any major responsibility for emergency plan training in the 1985-86 period.

5. Recommendation: Proceduralize the tracking system aspect of the emergency planning staff's scheduling and planning system, including the administrative mechanisms intended to ensure that timely corrective actions are taken on all items being tracked.

Response: As identified in our February 4, 1985 SALP response (Serial 1-497), the Emergency Planning Activity Scheduling System is currently under development and will be used to identify and maintain commitments, required activities, and routine activities. The system will be formally implemented for all future commitments by September 30, 1985, and will have in place procedures for identification, tracking, and correction of action items.

6. Recommendation: In addition to items identified in NRC inspection reports and the licensee's drill and exercise critiques, the emergency planning staff should also track the implementation of corrective actions being taken on training session recommendations and audit observations.

Response: The Emergency Planning Activity Scheduling System is being designed to track all emergency preparedness activities including NRC and INPO commitments, drill and exercise critique items, required performance tests, required training, and Quality Assurance audit finding reports. When the system is fully utilized, training session recommendations and audit observations identified for inclusion in the emergency planning program will be tracked.

7. Recommendation: Adequate performance of emergency duties should be included in the performance objectives of persons assigned to the emergency response organization.

Response: Toledo Edison identified in its SALP presentation to NRC Region III that the Management by Objective (MBO) program was being implemented. The program, as implemented at Toledo Edison, is used to develop an individual's performance where changes are required.

A memorandum will be issued by the Assistant Vice President, Nuclear Operations, to the Nuclear Mission Directors identifying that duties prescribed in the Emergency Plan be discussed during the MBO process and a mutual understanding of Emergency Plan responsibilities gained. Additionally, establishment of new objectives for performance changes are necessary when it is identified that satisfactory performance is not being achieved.

8. Recommendation: Timely completion of all emergency preparedness training for staff personnel should be included in the performance objectives of supervisors of personnel assigned to the emergency response organization.

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Response: On February 4, 1985, a memo was sent to all Nuclear Mission employees from the Assistant Vice President, Nuclear Operations, identifying that attendance at all scheduled training classes, including Emergency Plan Training, was required. The Assistant Vice President, Nuclear Operations is to be notified personally of any non-attendance at scheduled training. This action addresses our concern over attendance and timely completion of required training programs, including emergency preparedness.

JH:nlf