

Docket No. 50-346

License No. NPF-3

Serial No. 1137

April 3, 1985



RICHARD P. CROUSE
Vice President
Nuclear
[419] 249-5221

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

Dear Mr. Stolz:

On September 6, 1984, (Serial No. 1076), the Toledo Edison Company (TED) submitted the Appendix R Compliance Assessment Report (CAR). This report documented the level of compliance of the Davis-Besse Nuclear Power Station Unit No. 1 (DB-1) to the requirements of 10 CFR 50 Appendix R. Additionally within that report, plant modifications were proposed to bring the plant into compliance to the regulations.

With regard to those proposed modifications, within Serial No. 1076, it was stated that TED intends to prioritize the proposed modifications and revise the Summary Level Planning Worksheet to show a realistic schedule for completing the proposed modifications. The intent of this letter is to discuss the factors that have delayed the modification prioritization efforts and to provide a revised date that the prioritized modification schedule can be forwarded to you.

The original schedule for completing modification prioritization was based upon two factors: 1) the completion of the modification conceptual design for the "most important to nuclear safety" modifications; and 2) the prioritization of all proposed modifications through the use of a Davis-Besse specific Fire Risk Assessment. Delays have occurred in both of these activities. The primary reasons for these delays are itemized below.

1. The numerous technical issues requiring immediate attention during the 1984-1985 refueling outage necessitated the temporary shift of manpower to support those activities.
2. The resulting lack of manpower has impacted the conceptual design development effort in addition to the in-house technical review of the draft Fire Risk Assessment.
3. While conceptual design activity continues to receive high priority attention, the on-going Fire Protection resolution effort requires a

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significant amount of resources. These activities include but are not limited to:

- Continued Fire Protection analyses
- Plant walkdowns
- Fire Protection procedures revision
- Performance Enhancement Program (PEP) Fire Protection Action Plan support

4. A study of modification alternatives and the determination of the full acceptability of the final proposed modification alternatives has taken longer than anticipated.

While this modification prioritization activity is proceeding somewhat slower than expected, Toledo Edison is making no change to the commitment of achieving full compliance to Appendix R within three refueling cycles, in order of the most significant fixes per our ILSP process, defined in Serial No. 1043 dated July 16, 1984.

Based upon the current summary level schedule and work progress, a realistic implementation schedule for modifications to be completed through the end of 1986 will be provided to you no later than September 27, 1985. We feel that this is reasonable considering the time required to develop detailed schedules under our Integrated Living Schedule Program (ILSP) schedule and the relative significance of the other Davis-Besse modification and programmatic issues competing for resources.

As discussed with members of the NRC Staff, detailed implementation schedules for major ILSP projects are not developed until well into the design process. Since this is still 6-12 months away on some individual modifications that could be completed by the end of 1986, a realistic schedule is not yet available.

As part of the continuing ILSP schedule revision and statusing process, the NRC will be updated on the fire protection project on a semi-annual basis.

In an effort to reach an agreement as to the acceptability of the Toledo Edison Fire Protection resolution program, Toledo Edison would support a meeting with appropriate members of the NRC Staff. We would appreciate the opportunity to discuss our progress and demonstrate our commitment to the problem resolution.

My staff looks forward to continued interaction with you on this high priority issue.

Very truly yours,

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cc: DB-1 NRC Resident Inspector