

Docket No. 50-346

License No. NPF-3

Serial No. 1-482

November 30, 1984



RICHARD P. CROUSE
Vice President
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Mr. C. E. Norelius, Director
Division of Reactor Projects
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Norelius:

Toledo Edison acknowledges receipt of your November 2, 1984 letter (Log No. 1-1053), and enclosures, Appendix A, Notice of Violation, and Inspection Report No. 50-346/84-20 (DRP).

Following an examination of the items of concern, Toledo Edison herein offers information regarding these items:

1. Violation: Technical Specification 6.8.1 states, in part, "written procedures shall be established, implemented and maintained covering the activities referenced in Appendix "A" of Regulatory Guide 1.33, November, 1972. Section 1 of Appendix A of Regulatory Guide 1.33, November, 1972 is Administrative Procedures.

Contrary to the above, Administrative Procedures were not adhered to in that:

- a. The inoperability of the #2 Control Room Emergency Ventilation System (CREVS) Freon compressor was not reported to the shift supervisor during the performance of TP 641.00 as required by Administrative Procedure AD 1839.00.
- b. The shift supervisor was not informed of the fact that the pressure door connecting the two Auxiliary Feedwater Pump rooms was left open and unattended, potentially rendering both AFW pumps inoperable as required by Administrative Procedure AD 1839.

- c. A Test Leader for the performance of test procedure TP 641.00 was not assigned as required by Administrative Procedure AD 1801.00.
- d. A chronological log was not maintained to document test activities during the performance of test TP 641.00 as required by Administrative Procedure AD 1801.00.
- e. Proper administrative control of the "Control Copy" of test procedure TP 641.00 was not maintained as required by Administrative Procedure AD 1801 in that the test procedure was removed from the station for a period of four days.
- f. A deviation report identifying procedural violations was not generated as required by AD 1807.00.

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

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

- a. The No. 2 Control Room Emergency Ventilation System was declared inoperable on August 11, 1984, when operating in the water cooled condenser mode. Since the air cooled condenser mode provides 100% cooling capability, the train itself was not rendered inoperable.
- b. A sign was placed on the Auxiliary Feedwater Pump Room water tight door notifying personnel that the door is not to be left open and unattended as this would render the Auxiliary Feedwater Pumps inoperable.
- c, d, e. A Test Leader was assigned to TP 641.00 and the individual was trained in his responsibilities with respect to test performance. Additionally, a chronological log and control copy of the test procedure is being maintained for TP 641.00 as required by procedure AD 1801.00, Station Modification Acceptance Test Program. The Station Instrument and Control Shop personnel and Maintenance staff were instructed on the specific requirements of procedure AD 1801.00. They were additionally instructed on the necessity for informing the Shift Supervisor of test deficiencies

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and operability considerations per procedure AD 1839.00, Station Operations, and the reportability requirements of AD 1807.00, Control of Conditions Adverse to Quality.

f. DVR 84-166 was generated on November 5, 1984 identifying the procedural violations.

(2) Corrective action taken to avoid further noncompliance.

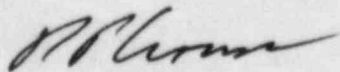
A listing will be prepared for all test procedures that have been identified as requiring acceptance testing during the 1984 refueling outage. Each test procedure will be reviewed to ensure that a cognizant individual has been assigned as test leader, and that this individual understands the requirements of AD 1801.00, AD 1807.00, and AD 1839.00.

Additional training for the Station staff on the above mentioned administrative procedures will be provided as longer term corrective action.

(3) Date full compliance will be achieved.

The longer term training will be conducted by July 1, 1985.

Very truly yours,



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