



Docket No. 50-346

License No. NPF-3

Serial No. 1134

April 12, 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:

This is in response to your letter dated January 25, 1985 (Log No. 1686) that requested Toledo Edison's response to a questionnaire on Regionalization. Attachment 1 to this letter is our response as it relates to the Davis-Besse Nuclear Power Station Unit No. 1.

Very truly yours,

RPC:RFP:lah

cc: DB-1 NRC Resident Inspector

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Survey for Licensees Regarding
Regional Review of Licensing Actions

The responses to the following questions are made in the context of the Regional reviews specifically related to Toledo Edison. The reviews assigned by Nuclear Reactor Regulation (NRR) to the Region to date have not been those of significant safety concerns.

Question 1: Has the overall safe operation of your facility been enhanced by having selected licensing action technical reviews conducted in the Region? If so, how?

Response: To date, none of the issues that have been forwarded to the Region for review would have resulted in any significant difference in the overall effect on the safe operation of the facility. Therefore, no enhancement in the overall safe operation of the facility has been realized.

Question 2: Have you been generally satisfied with the time response of licensing actions when Regional reviewers are involved?

Response: Each licensing action is unique and it is difficult to predict the length of time required to accomplish. However, recognizing that the reviews which have been forwarded for Regional review have not been seen to be of a critical nature, timely response has not been seen as either a problem or an advantage.

Question 3: Did improved communications between your staff and the NRC result from the Regional review process?

Response: The Regional review process has not resulted in any overall significant improvement in communications between the NRC and Toledo Edison. Prior to regionalization, the NRR Project Manager would coordinate communications through an individual in the utility. This insured a mutual understanding of priorities, importance and actions. In some cases, Regional review activity contacts have been made directly with the utility independent of either NRC or utility coordinator. This has, at times, lead to confusion on licensing action priorities, efficiency and requests for additional information.

Question 4: Has the Regional review process resulted in fewer technical disagreements between your staff and the NRC over licensing actions?

Response: For those items reviewed to date by the Region, there has been no apparent reduction in the number of technical disagreements over licensing actions. Most disagreements associated with technical reviews originate in lack of understanding of the issues involved or the effect of the issues on the specific plant. In several instances, the Region reviewers do not appear to be as familiar with the plant safety design basis as reviewers in NRR. Additionally on reviews concerning a very limited scope activity, it seems to be a tendency in the Regional case to go beyond the scope of the review requested by NRR. Both of these items tend to result in disagreements during the review, some technical, some administrative.

Question 5: Have you been generally satisfied with the types of licensing activities being reviewed in the Regions?

Response: Based on the types and significance of the reviews being forwarded to the Region for Davis-Besse, Toledo Edison has not been significantly dissatisfied with the types of licensing activities being reviewed in the Region.

Question 6: Can you suggest licensing actions that are not being reviewed in the Regions, that in your opinion, should be?

Response: In our opinion, the depth of historical and technical expertise available to NRR as well as the overall understanding of prioritization needs on both sides makes NRR the more appropriate reviewer for the majority of licensing actions. No additional types of actions are recommended for Regional assignment.

Question 7: Can you identify any licensing actions that were reviewed in the Regions that, in your opinion, should have been reviewed by Headquarters?

Response: See the response to Question 6.

Question 8: Has the Regional review process brought pressures to bear that would not ordinarily be experienced from Headquarters reviews; e.g., enforcement concepts, etc.?

Response: TED has seen no evidence that pressures such as enforcement concepts have been brought to bear on Regional reviews. However, a person normally tasked with an enforcement orientation has difficulty divorcing those aspects from a technical review.

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Question 9: Would you say that the overall quality of the licensing review process has improved, stayed the same, or degenerated as a result of Regional involvement?

Response: Although Regional activities have not degraded the overall quality of the licensing process, TED believes that the overall quality is maintained better by NRR. From a documentation aspect, the depth and quality of NRC safety evaluations is noticeably lacking in the Regional review. From a coordination concept, the Regional activities have had a mildly adverse effect on the efficiency of regulatory interactions.

If Regional assignments continue, these areas should be evaluated for improvement.