

Docket No. 50-346

License No. NPF-3

Serial No. 1-516

April 17, 1985



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 March 18, 1985 letter (Log No. 1-1137), and enclosures, Appendix, Notice of Violation, and Inspection Report No. 50-346/85-05(DRS).

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

1. Violation: 10 CFR 50, Appendix B, Criterion V, as implemented by the Toledo Edison Nuclear Quality Assurance Manual, Section 17.2.5, requires that activities affecting quality be prescribed by documented instructions and procedures and accomplished in accordance with those instructions and procedures.

Contrary to the above, the licensee's followup actions with regard to overdue vendor audit finding responses were not in accordance with procedure QAI 4184.

This is a Severity Level V violation (Supplement I). (346/85-05-01)

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

Vendor audit finding reports were reviewed to identify those vendors that have not responded to an open audit finding. Those vendors with overdue responses for open audit finding reports were solicited for responses and the communications were documented.

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Additionally, a review of QAI 4184, Audit Activities, was performed. The instruction clearly requires follow up and documentation by a Quality Assurance staff member when a response to an audit finding report is not received by the scheduled response date. Therefore, no procedural changes are required for QAI 4184.

- (2) Corrective action taken to avoid further noncompliance.

On February 4, 1985, and April 1, 1985, Toledo Edison Quality Assurance Auditors were counseled on the audit follow up requirements of QAI 4184.

- (3) The date when full compliance will be achieved.

Full compliance with corrective actions has been achieved.

2. Violation: 10 CFR 50, Appendix B, Criterion XVI, as implemented by the Toledo Edison Nuclear Quality Assurance Manual, Section 17.2.16, requires that conditions adverse to quality be promptly identified and corrected.

Contrary to the above, on January 23, 1985, there were 121 open deviation requests of which 43 were identified prior to 1984.

This is a Severity Level V violation (Supplement I). (346/85-05-02)

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

Toledo Edison has taken various actions over the past several years in an effort to resolve Deviation Reports (DVR's) and provide timely closeouts.

An Open DVR Log was initiated by the Technical Section, and distributed to the Station Review Board (SRB) and Davis-Besse Section Heads to identify the backlog of open DVR's.

In mid-1984, the Technical Section hired an individual whose responsibility is to follow up with cognizant individuals identified on the Open DVR Log for resolution of the DVR. These actions have resulted in reducing the number of open DVR's prior to 1984.

Toledo Edison has implemented as of January, 1985, a DVR Tracking System on the Davis-Besse Maintenance Management System (DBMMS). This system currently provides a computerized listing of all open corrective actions. The system will be modified to permit the generation of reports to personnel to review those DVR corrective actions for which they are responsible.

The actions since mid-1984 have yielded positive results and these results are continuing. Your inspection report identified 43 open DVR's identified prior to 1984 and 78 open DVR's identified in 1984 as of January 23, 1985. Toledo Edison has reduced the number of DVR's identified prior to 1984 to 31 and those identified in 1984 to 50, as of the end of March, 1985. As part of the Toledo Edison Nuclear Mission Performance Program for 1985, a goal has been established for maintaining the ratio of closed DVR's to new DVR's greater than one. It is expected this ratio will remain high as the back log is being reduced.

(2) Corrective action taken to avoid further noncompliance.

In March, 1985, the Station Review Board established a subcommittee whose responsibilities include an early review of DVR corrective actions. This subcommittee meets with the DVR cognizant individual to identify the proper approach to the corrective actions required. This should result in a reduction in the average time that it takes to resolve and complete all corrective action.

The measure of the adequacy of the DVR program should not be the number of open DVR's, but more appropriately the adequacy of the resolution to the DVR.

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- (3) The date when full compliance will be achieved.

Toledo Edison has taken the necessary corrective actions and achieved full compliance in that the actions taken above have resulted in a reduction of the backlog of open DVR's and are expected to provide timely resolution of future DVR's.

It is expected that by August, 1985, the existing backlog will be reduced to an acceptable level.

Very truly yours,

R O Croft/ton

RPC:DJM:JRL:SGW:nlf
cc: DB-1 NRC Resident Inspector