

Docket No. 50-346

License No. NPF-3

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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 8, 1985 letter (Log No. 1-1126), and enclosures, Appendix A, Notice of Violation, and Inspection Report No. 50-346/85-01 (DRS).

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

1. Violation: Technical Specification, Section 6.8.3.c, requires the Station Review Board to review and the Station Superintendent to approve temporary modifications to safety-related procedures within 14 days of the date the modification was implemented.

Contrary to the above, during the period April-June, 1984, eight to ten percent of the temporary modifications to safety-related procedures were reviewed and approved more than 14 days after the date the modifications were implemented.

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

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

A review of the three specific examples cited did not fully support the finding as stated. Technical Specification 6.8.3.c requires full approval of a temporary modification within 14 days of implementation. Step 7.3.4.10 of Administrative Procedure AD 1805.00, Procedure Preparation and Maintenance, defines implementation as actual

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usage of the temporary modification. The temporary modification form has provisions to indicate distribution for those temporary modifications slated for immediate implementation (usage) and such temporary modifications must meet the 14 day requirement to ensure a timely review. However, if the temporary modification is not designated for immediate implementation, the modification is distributed for implementation after approval by the Station Review Board (SRB) and the Plant Manager and, therefore, satisfies Technical Specification requirements.

Temporary modifications (T-mods) 7922 and 7868 were not designated for immediate implementation, therefore, they had the required approvals by the SRB and Plant Manager prior to distribution and usage.

T-mod 7956 was implemented on May 8, 1984 and first reviewed by the SRB on May 18, 1984. The temporary modification was placed on hold by the SRB due to questions regarding single failure criteria as documented in SRB Minutes Number 1463 and subsequently exceeded the 14 day Technical Specification limit.

The SRB Chairman has instructed the Station Section Heads to expedite approval of temporary modifications, which are being routed in distinctive red covers. The Maintenance and Operations Department staffs were addressed by the Plant Manager on the item of noncompliance and the processing of temporary modifications.

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

Tracking of procedure modifications by the SRB Clerk has been transferred from a manual process to a computerized system. This process identifies to the SRB Clerk, upon inquiry, of temporary modifications approaching the 14 day limit.

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

Full compliance with corrective actions have been completed.

2. Violation: Technical Specification, Section 6.8.1.a, requires that procedures be established, implemented and maintained as required by Regulatory Guide 1.33 (November 1972), Appendix A, Section H.

Contrary to the above:

- a. Two examples were identified where uncontrolled technical manuals were used in lieu of approved procedures for the calibration of instrumentation required to verify compliance with the Technical Specifications. (346/85-01-2A)
- b. Numerous examples were identified where approved calibration procedures were not established for the calibration of M&TE. (346/85-01-2B)

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

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

The two examples cited in this violation were for instruments required for Technical Specification compliance, but are not on the Davis-Besse Q-List. Maintenance on these instruments has been governed by IC 2001.00, Test Equipment Calibration, which permits the use of uncontrolled vendor manuals.

Instrumentation identified on the Davis-Besse Q-List are treated as nuclear safety related and maintenance on the instrumentation is performed using approved procedures and nuclear safety related maintenance work orders. Vendor manuals used in conjunction with procedures for nuclear safety related maintenance are presently controlled.

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

A calibration program will be developed for permanently installed Technical Specification Compliance Instrumentation. This program will use approved procedures or controlled vendor manuals for the calibration of instrumentation required to verify Technical Specification compliance.

An administrative procedure is being developed to specify the method to validate vendor manuals available for maintenance activities and for inclusion into the controlled vendor manual system. The vendor manuals will be reviewed by Maintenance personnel to verify that the information is applicable and technically correct. The validation is expected to occur as part of scheduled maintenance on permanently installed equipment or instrumentation.

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

The administrative procedure identifying the method for validating vendor manuals will be completed by June 28, 1985.

It is expected that the calibration program for Technical Specification Compliance Instrumentation and controlled vendor manuals will be accomplished by April 30, 1987.

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

A major modification (M-8598) was generated to revise Administrative Procedure AD 1849.00, Measuring and Testing Equipment Control and Calibration, to include the requirements of the new calibration lab, and standardization of procedures and controls used for Maintenance and Test Equipment (M&TE).

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

Procedure IC 2100.00, Test Equipment Calibration, will be consolidated with MP 1410.03, Measuring and Test Equipment Calibration, to describe the controls to be used to ensure the proper calibration of all M&TE, the completion of all required calibration records, and the specific responsibilities of the individuals involved.

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

MP 1410.03, Measuring and Test Equipment Calibration, will be revised and implemented by June 28, 1985.

Full compliance will be achieved by January 1, 1986, with the implementation of the calibration laboratory.

3. Violation: Technical Specification, Section 6.8.2, requires that all procedures implemented pursuant to Technical Specification, Section 6.8.1.a, be reviewed by the Station Review Board and approved by the Station Superintendent.

Contrary to the above, maintenance instruction MC-71 was neither reviewed by the Station Review Board nor approved by the Station Superintendent prior to its use in a safety-related application.

This is a Severity Level V violation (Supplement I). (346/85-01-03)

Response:

- (1) Corrective action taken and results achieved.

Maintenance Instruction MI-71, Installation of Anchor Bolts, was converted into Maintenance Procedure MP 1408.00, and approved for use on August 28, 1984.

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

The existing Maintenance Instructions have been reviewed to determine those instructions that are frequently used in nuclear safety related activities. These frequently used instructions have been converted to Maintenance Procedures (MP's), which require review and approval by the Station Review Board and the Plant Manager, in accordance with Administrative Procedure AD 1805.00, Procedure Preparation and Maintenance, and AD 1844.00, Maintenance.

The remaining Maintenance Instructions that are applicable to nuclear safety related activities will be converted to Maintenance Procedures. Administrative controls specified in AD 1844.00 prevent the use of Maintenance Instructions for nuclear safety-related activities.

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

Full compliance will be achieved by December 1, 1985, with the conversion of safety-related Maintenance Instructions to Maintenance Procedures.

4. Violation: 10 CFR 50, Appendix B, Criterion V, as implemented by the Toledo Edison Nuclear Quality Assurance Manual, Section 17.2.5, including a commitment to ANSI N18.7-1972, requires that activities affecting quality be prescribed by appropriate procedures or instructions. ANSI N18.7-1972, Section 5.1.6.1, requires that maintenance that can affect the performance of safety-related equipment shall be properly preplanned and performed in accordance with written procedures.

Contrary to the above, the instructions provided in Maintenance Work Order Nos. 3-84-0826-01, 2-83-0062-02, and 1-84-1900-00 were not of sufficient detail for the type of activities being performed.

This is a Severity Level V violation (Supplement I). (346/85-01-04)

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

Administrative Procedure AD 1844.00, Maintenance, was modified by Temporary Modification (T-Mod) 9008 on March 23, 1984, to expand the licensed Senior Reactor Operator review of Maintenance Work Orders to verify that the description of work to be performed is clear and concise.

(2) Corrective action taken to avoid further noncompliance.

AD 1844.00, Maintenance, currently requires that Maintenance Work Order instructions be entered in adequate detail to describe and control the performance of the required maintenance.

Maintenance Staff personnel and Station Lead Support Engineers responsible for the preparation and approval of Maintenance Work Orders received training on AD 1844.00 during March, 1985.

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

Full compliance with corrective actions has been completed.

Very truly yours,

RP Crouse / jrm

RPC:SGW:dh/nlf

cc: DB-1 NRC Resident Inspector