

Docket No. 50-346

License No. NPF-3

Serial No. 1-523

April 30, 1985



RICHARD P. CROUSE
Vice President
Nuclear
(419) 249-5221

Mr. James G. Keppler, Regional Administrator
Region III
United States Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

In the March 4, 1985 response (Serial No. 1-502) to the Davis-Besse Systematic Assessment of Licensee Performance (SALP), Toledo Edison committed to provide the program plan and schedule for the system-by-system review of the Updated Safety Analysis Report (SAR).

Attachment 1 provides the methodology by which the review will be conducted. It is expected that this review will be completed by July 1, 1987.

Very truly yours,

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cc: DB-1 NRC Resident Inspector

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SAR REVIEW PROGRAM

I. INTRODUCTION

In order to broaden our understanding of the design, operating, and licensing bases of Davis-Besse, Toledo Edison has initiated a long term program to document and disseminate as much of this important information as practical. The first step of this program will be the review of the Updated Safety Analysis Report (SAR). The SAR review will be performed on a systematic basis with an overall objective of correcting errors in the SAR and extracting important operational and design information for incorporation into other user oriented information systems. The review is to be conducted by experienced Toledo Edison personnel familiar with the design, operation, and licensing bases of the plant.

II. OBJECTIVES

The SAR review process is an ambitious project with several important objectives. The objectives for this project are listed below in order of decreasing importance:

- A. The line-by-line review of the SAR for potential errors and development of proposed changes.
- B. The compilation of system functions identified in the SAR.
- C. The compilation of component functions identified in the SAR.
- D. The compilation of procedural requirements and operational restrictions identified in the SAR.
- E. The identification of component quality classification using the newly developed safety classification system (4Q).
- F. The compilation of all system functions not identified in the SAR.

The foregoing represents the minimum set of objectives to be accomplished by the review process. An additional objective to be accomplished, as time permits, is as follows:

- G. The compilation of all component functions not identified in the SAR.

The SAR review is to be performed on a system-by-system basis. The systems to be reviewed include all safety related systems and major non-safety related systems on a predetermined sequence.

While the majority of the SAR will be reviewed by the system-by-system approach, portions of the SAR are not amenable to this approach. Those sections of the SAR will be reviewed separately at the conclusion of the system-by-system review.

III. SAR REVIEW METHODOLOGY

The key activity of this project is the SAR review meetings to be held for each system. The reviewers will be assembled as a group to evaluate all portions of the SAR relative to the subject system at one time.

A. Personnel

The personnel selected for the SAR review are experienced individuals with a background in engineering and/or operations. To provide an engineering input, two of the following three people will participate in each review meeting:

Fred Miller
John Wood
Sushil Jain

To provide operational input, two of the following four people will attend each review meeting:

Mike Derivan
Bill O'Connor
Louis Simon
Jacque Lingenfelter

Substitutions for the specific personnel listed above may be made with the joint concurrence of the Plant Manager and Nuclear Facility Engineering Director.

Additionally, for each system review, a designated Engineering System Expert and a designated Station System Expert will participate in the meeting.

Finally, one or more individuals dedicated to monitoring and managing the review process will be in attendance. This individual(s) is designated as the Process Manager.

Other individuals as deemed appropriate may also be invited to the meeting.

B. Documentation

The following information should be available for the review:

- 1) One complete controlled copy of the SAR
- 2) Uncontrolled copies of the SAR sections to be reviewed.
- 3) One controlled copy of System Procedures
- 4) One controlled copy of Technical Specifications
- 5) One controlled copy of P&IDs (one full set with both as-builts and DCNs for implementation)
- 6) One controlled copy of electrical one line diagrams
- 7) One controlled copy of elementary electrical diagrams
- 8) One controlled copy of piping isometrics

C. Pre-meeting Activities

To effectively use the time available in the SAR review meetings, certain pre-meeting activities will be performed. These activities include the definition of system boundaries, the selection of specific SAR sections and pages to be reviewed, and compilation of any additional reference documentation deemed necessary. The pre-meeting activities will normally be performed by the Engineering System Expert and the Station System Expert, and coordinated by the Process Manager.

D. SAR Review Meeting

The following activities are to be accomplished during the SAR review meeting for a given system:

1. A review of the identified system boundaries.

2. A line-by-line review of the appropriate SAR sections to accomplish the objectives identified in items A through D of Section II.
3. The identification of component quality classification boundaries using the 4Q system.
4. The identification of additional system and component functional information.

E. Post Meeting Activities

The review activities identified in the previous section will generate factual information to be compiled and distributed, and lists of action items requiring further research and/or problem rectification. Section IV contains a general discussion of the factual information to be distributed to the Mission.

Three major categories of action items will be identified during the SAR review process. The first of these will require additional research to determine or clarify certain factual information.

The second category will require additional research and, if necessary, correction of potential deviations between the existing plant design and the SAR description. Correction of such deficiencies would be accomplished by either modification of plant design or performance of the safety evaluation to modify the SAR.

The third category of action items would require the comparison of existing procedures to operational restrictions and procedural requirements identified in the SAR. Differences identified will be corrected by modifying the procedure or performing a safety evaluation to modify the SAR.

The responsibility for the action items may be assigned to any Nuclear Mission personnel. Coordination of action item resolution is to be performed by the Process Manager.

F. Process Manager

The primary function of the Process Manager, as described above, is to monitor and manage the SAR review program. This individual(s) will coordinate all administrative activities, such as reference document control, process instruction preparation and maintenance, record keeping activities, and the preparation and maintenance of the review schedule. The technical responsibili-

ties of the Process Manager consist primarily of assuring that the review process is consistently applied to each system. This would include, for example, assuring that the system boundary definitions are established during the pre-meeting activities in accordance with guidelines established for that activity. Similarly, the Process Manager would make sure that guidelines established for documenting system and component functional information are consistently applied.

IV. DISTRIBUTION OF INFORMATION

The objective of distributing SAR review information is to provide Mission personnel with the information pertinent to their activities. Some of the information generated during the SAR review process will be disseminated in the form of revisions to the SAR and corrections to Mission procedures. The addition of information to, or the modification of, procedures, and/or changes to the plant design, initiated by the SAR review process will be forwarded to the Training Department for evaluation with respect to required training program changes in accordance with established procedures. Information on system and component functions are to be compiled and distributed for use by Nuclear Mission personnel.

V. SCHEDULE

The review of systems and other SAR sections not system related should be completed within 1½ to 2 years. The assumptions used to develop this estimate are as follows:

1. Review meetings will be held on an approximately weekly basis.
2. One meeting each month will be set aside as a makeup session or to allow members of the SAR review group to meet with a larger group of individuals to discuss other aspects of the longer term program to document the Davis-Besse design bases.
3. Review of a single system is expected to require from 1/2 to 2 meetings, depending on the system complexity.
4. A total of 55 systems are currently being considered for review.
5. Review of the non-system related SAR sections is expected to take 5 to 10 meetings.

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Systems are to be reviewed in approximately the order of safety significance, i.e., safety related systems will be reviewed first followed by major non-safety related systems. Regular SAR review meetings should begin in June of 1985; therefore, the review project should be completed during the first half of 1987.

The post meeting activities, including deficiency resolution and information distribution, will lag behind the SAR review meetings. The extent of this lag will depend upon the amount of information generated and the number of action items created. The post meeting activities will, however, be conducted in parallel with the SAR review meetings. As the process for these activities becomes more clearly defined, this lag time should decrease.

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