

Docket No. 50-346

License No. NPF-3

Serial No. 1154

June 25, 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:

Toledo Edison is pleased to resubmit the attached "Integrated Living Schedule Program Plan for the Davis-Besse Nuclear Power Station" (ILSP Plan), to the Nuclear Regulatory Commission (NRC) for approval.

The attached ILSP Plan documents the process that Toledo Edison proposes to implement in conjunction with the NRC. We feel certain that this process will allow Toledo Edison and the NRC to; 1) optimize the allocation of Toledo Edison and NRC resources among those activities necessary to assure the continued safe, reliable and economic operation of Davis-Besse; and, 2) achieve the appropriate balance and prioritization between Toledo Edison initiated activities and NRC required activities, thereby providing a rational basis for planning, scheduling, and implementing necessary plant betterment projects at the Davis-Besse Nuclear Power Station.

As discussed with NRC personnel, Toledo Edison is continuing the development of the ILSP process and implementing program enhancements through the Performance Enhancement Program (PEP) Action Plans developed during 1984. The Draft ILSP Plan submitted as Serial No. 996, January 20, 1984, and the ILSP Plan submitted as Serial No. 1043, dated July 16, 1984, have been modified to incorporate NRC comments.

The most recent meetings of February 28, 1985 and April 24, 1985, were held with Mr. A. W. DeAgazio, of your staff, to discuss and incorporate the NRC legal comments on the July 16, 1984 submittal.

During the last meeting, Toledo Edison was informed that ILSP Plan compliance would be most likely monitored by Region III and/or the Site Resident Inspector. Significant discussion took place on the scope of a Regional audit and what documentation would need to be auditable.

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The mutually understood limit to such an audit is the Schedule Change Package produced semi-annually by Toledo Edison to update schedule progress and changes approved by Toledo Edison from the original ILSP schedule submittal scheduled for late July, 1985. Toledo Edison's License Amendment Request to be submitted under separate cover is based upon audits by the NRR. These audits would assure that the ILSP Plan required documentation exists and the Toledo Edison submitted schedule is acceptable. The audit specifically will not audit the process that produces the schedule, which is not under 10 CFR 50, Appendix B, or audit the basis for management decision.

If the schedule is acceptable to the NRC, and safety issues and non-safety issues are adequately addressed in the ILSP schedule, then Toledo Edison believes the process that produced the schedule is acceptable. If the schedule is unacceptable, the plan allows an evaluation period for the NRR to request additional data and/or request a change in a specific date, if warranted.

By October, 1985, design engineering and craft labor resources for Capital projects and major Operations/Maintenance (O/M) projects will be managed under the ILSP process philosophy. These resources and projects are the key to the success of our overall ILSP schedule.

We recognize the fully effective ILSP program will continue to evolve over the next two years with the further development of our Probabilistic Risk Assessment (PRA) based Safety Impact and Availability Models. These models, along with other PEP enhancements in the overall ILSP program, will not alter the basic concepts identified in the attached ILSP Plan.

We believe you will find the attached plan acceptable and consistent with the NRC's concept of the Integrated Living Schedule Program.

Very truly yours,



RPC:DBI:nlf

encl.

cc: DB-1 NRC Resident Inspector

TOLEDO EDISON COMPANY - DAVIS-BESSE NUCLEAR POWER STATION

INTEGRATED LIVING SCHEDULE PROGRAM PLAN

I. Introduction

A. Purpose

Toledo Edison Company (TED) determined that the effectiveness of the overall management of its Nuclear Mission would be enhanced if its budgeting, project management¹, planning and scheduling activities for plant improvement or modification ("Plant betterment") projects/issues, both TED and NRC initiated, were combined into a single integrated program. This integrated program has been designated as the "Integrated Living Schedule Program" (ILSP).

The purpose of this "Plan" is to establish, within the ILSP framework, a rational basis upon which TED and the United States Nuclear Regulatory Commission (NRC) will fulfill specific responsibilities as related to the Davis-Besse Nuclear Power Station (Davis-Besse).

B. Objectives

The primary objectives of the ILSP Plan are:

1. To optimize the allocation of TED and NRC resources among those activities necessary to assure safe, reliable and economic operation of Davis-Besse.
2. To achieve the appropriate balance and prioritization between TED initiated activities and NRC required activities, thereby providing a defensible and consistent basis for planning, scheduling and implementing necessary plant betterment projects at Davis-Besse.

C. Plan Content

This Plan contains four (4) sections as identified below:

Section I - Presents the purpose, objectives and content for the Plan.

1 Project management includes Nuclear Facility Engineering, Material Management, Nuclear Projects, Station Management, Licensing, Quality Assurance, Nuclear Safety, and Security.

- Section II - Describes the ILSP as it is being implemented by TED.
- Section III - Identifies the "schedules" that will be generated by TED as part of the ILSP process. This Section also specifies the process and responsibilities of TED and the NRC with regard to modifications of the "schedules".
- Section IV - Specifies the basis for TED and NRC implementation and enforcement of this Plan.

II. Description of TED Program

A. General

The ILSP process has been incorporated by TED into the normal management activities of the Nuclear Mission. In this regard, TED has defined the ILSP as stated below:

The Integrated Living Schedule program optimizes the implementation of plant betterment activities to best use the limited resources of both the NRC and TED. By utilizing a rational process of identifying, integrating, prioritizing, planning and scheduling plant betterment activities, considering safety, regulatory, reliability, operability and economic factors as well as financial, hardware and human constraints, it optimizes the allocation of resources for assuring the safe, reliable, economic operation of Davis-Besse.

Figure 1 shows a simplified flow diagram of the ILSP process. The activities shown on Figure 1 can be separated into functional areas of: 1) Issue/project evaluation; 2) Prioritization activities; 3) Planning and Scheduling; and 4) Implementation.

While each of these functions was always a part of TED's management activities, the integration of these functions into a single coherent program makes the effectiveness of the whole program greater than the sum of the parts. This plan addresses such an integrated program.

Considering the functional areas of activity in a general way, issue/project evaluation includes those activities associated with performing conceptual engineering, safety and economic assessments of both NRC and TED identified issues (plant betterment projects).

An important aspect of the issue/project evaluation function is the "technical" integration that takes place during these activities. Basically, technical integration entails determining how issues or projects affect each other and defining whether combinations of issues or projects could reduce the

scope of planned activities and result in an improved plant design.

Prioritization activities are a critical component of TED's ILSP. These activities are intended to provide a consistent and appropriate basis for planning and scheduling the major plant betterment projects recognizing a set of appropriate prioritization factors (e.g., safety, reliability, economics, etc.).

The planning and scheduling function includes those activities required to produce a comprehensive, prioritized and resource loaded schedule of plant betterment projects determined by TED to be applicable to Davis-Besse. This function must be capable of accommodating the output of the prioritization activities as well as to rationally impose the resource and other practical constraints that govern TED's ability to perform the plant betterment projects in the most cost-effective manner. Additionally, this function must have the capability to accommodate additions to and modifications of schedules.

The implementation portion of TED's ILSP refers to the actual implementation of the plant betterment projects and to the use of the ILSP in the management of TED's budget process.

B. TED Program

1. ILSP Management -

Implementation of the ILSP process at TED involves key personnel in the Nuclear Mission (See Figure 2) and has resulted in the modification to TED-Nuclear Mission procedures and policies to formally internalize the program. While the Senior Vice President, Nuclear is ultimately responsible for the program, day-to-day responsibility for assuring that the program is functioning has been assigned to the Davis-Besse Work Scope Committee (DBWSC).

The DBWSC is composed of at least six members, including as a minimum; the Assistant Vice President, Nuclear Operations; the Plant Manager; and the Directors responsible for Engineering, Licensing and Nuclear Safety, and Nuclear Projects; and the ILSP Manager. The DBWSC is responsible for directing the preparation of the overall ILSP schedule and to review proposed changes to schedules developed through the ILSP, recommending to the Senior Vice President, Nuclear what action should be taken. The DBWSC is also the management entity responsible for recommending the annual

capital budget projects and major² operation and maintenance projects to the Senior Vice President, Nuclear. In essence, the DBWSC represents a senior management committee providing an overview and centralized management of the ILSP.

2. Issue/Project Evaluation

TED utilizes a "Facility Change Request" (FCR) process that involves the preparation of an FCR for proposed plant betterment projects. In addition, Summary Level Planning Worksheets (SLPW) will be developed to evaluate projects/issues. The FCR and SLPW process includes preparation and review of documentation supporting the need for the FCR (capital and major maintenance FCR's) and the evaluation of alternatives for addressing the specific issue. As part of TED's formal FCR process, required safety reviews, safety evaluations and assessments are also performed. TED will modify, or develop procedures to integrate the activities of the FCR process into the ILSP. In addition, TED has supplemented the existing FCR review process with specific activities in the ILSP process. These activities are intended to achieve "technical integration" and improve the planning and scheduling input data. This extension of the FCR process and its coordination with the ILSP, forms an integrated system of TED resource management directed at improved plant safety and performance.

For major operational issues/projects that do not require FCR's, such as nuclear program changes, training, and organizational development activities, SLPW's will be (managed, developed, prioritized and implemented) under the ILSP process.

3. Prioritization

The prioritization function has been developed as part of the evolution of the ILSP process at TED. In this regard, TED considers the prioritization process to be dynamic and expects to make improvements to the process as better information (e.g., plant specific safety impact and reliability models) and improved methodologies become available.

The prioritization activities are performed under the auspices of the DBWSC. Specifically, a "Prioritization

2 The ILSP encompasses all capital projects, but only operations and maintenance projects which exceed \$100,000 in cost and require engineering resources or significant plant space. Operations and maintenance items not fitting these criteria are not included in the ILSP and will be tracked under other TED systems (i.e., commitment tracking system, etc.).

Subcommittee" reporting directly to and guided by the DBWSC has been established. The subcommittee is composed of designated individuals from the Station and the Nuclear Safety and Licensing, Nuclear Projects, and Nuclear Facility Engineering Divisions. Individuals are assigned to the subcommittee by the DBWSC. In making such assignments, the DBWSC assures that a broad spectrum of expertise and experience is represented on the subcommittee. Additions or changes to the subcommittee's membership can be made on a permanent, or temporary basis as deemed necessary by the DBWSC. It should be emphasized that a specific intent of the committee concept is to establish a broad-based highly experienced team that will perform the prioritization function in a consistent, rational and defensible manner.

Applicable issues and plant betterment projects being considered for inclusion in the ILSP are prioritized by the subcommittee with respect to the following prioritization attributes:

- a. Nuclear Safety
- b. Personnel Safety
- c. Regulatory Impact
- d. Plant Performance
- e. Operations Enhancement

The subcommittee assigns a priority designation to each issue/project for each of the prioritization attributes identified above. Specific criteria are predetermined for each prioritization attribute to guide the deliberations of the subcommittee.

In summary, the prioritization process is accomplished using identified criteria within the framework of a formal process that utilizes a highly qualified and experienced group of individuals.

In addition to the prioritization function, the subcommittee also provides a forum for overviewing the validated* SLPW's for each project and for identifying opportunities for better technical integration among issues/projects.

* NOTE: A validated SLPW is one which has been reviewed and signed off by each cognizant individual/department indicating the plan is valid based on the available data and project assumptions.

4. Planning and Scheduling

TED utilizes a Project/2 computerized planning and scheduling system. The planning and scheduling function is performed under the direction of the Nuclear Projects Division.

Figure 3 illustrates the basic summary level planning information that is input to the system. Through the combined usage of Project/2 and other software programs, the ILSP planning and scheduling process has the capability to plan and appropriately schedule multiple projects and activities considering the relative priorities of the projects and allowing the imposition of planning constraints. In this regard, as part of the planning process, the DBWSC can identify constraints (e.g., number of crafts onsite, maximum number of workers in an area, etc.) that are input to the planning and scheduling activities to achieve a realistic output of what can be accomplished over a specific time period (i.e., budget year, planned outage period, etc.).

TED updates the Project/2 system information on a regular basis to manage the implementation of projects and to identify schedule problems, or opportunities to accomplish additional activities. The status of the activities are regularly reported to the DBWSC by the Nuclear Projects Division with recommendation of actions that the DBWSC should consider taking. This process allows TED to make appropriate changes to project schedules when they are affected by activities such as unscheduled outages, strikes, delays in procurement or installation, modifications to fuel cycle schedules.

5. Implementation

The implementation function of the ILSP involves both the actual implementation of the projects included in the schedule and the relationship of the ILSP process to TED's annual budgeting process.

First, with respect to the actual implementation of capital projects included in the schedule, TED has established a formal project management process that resides with the Nuclear Projects Division. Each project is assigned to a specific project coordinator who reports to a designated project manager. The status of discrete activities (e.g., engineering, equipment status, construction, etc.) are monitored relative to the Project/2 planning networks by the project coordinator and reported to the project manager. Regularly scheduled project status reports are issued and as stated previously, the DBWSC is notified of circumstances that could affect the adopted ILSP "schedule".

The utilization of a formal project management process that has available the comprehensive planning and scheduling information provided by the Project/2 system, yields a high degree of confidence that the planned projects will be accomplished in accordance with TED's ILSP commitments.

A second area of ILSP implementation that should be acknowledged in this Plan relates to the development of budgets. Capital, operations and maintenance budget items must be approved by the TED Board of Directors prior to expenditure of funds for the projects.*

*NOTE: The TED budget cycle for Operations & Maintenance expenses begins in August each year and ends with the Board of Directors approval of the budget, typically the 3rd Tuesday in December. The annual capital budget cycle also ends with the December Board of Directors Meeting, but begins in June. However, due to the dynamics of the ILSP process, TED is currently evaluating a more frequent capital budget review which would provide a mechanism for "Implementation Schedule" (see Section III. A. for definition of the "Implementation Schedule") baseline modification, as necessary. The "Implementation Schedule" baseline modifications would reflect changes to project cost and schedule completion, based on the conceptual design, design, procurement, outage, and non-outage implementation plans or progress. As resources become available to accomplish the higher priority jobs in the "Long Range Plan" (See Section III A for definition of the "Long Range Plan"), projects will be integrated from the "Long Range Plan" into the "Implementation Schedule" on a priority basis, consistent with available resources.

Therefore, at the beginning of the budget approval process, the DBWSC supported by the Prioritization Subcommittee and the Nuclear Projects Division prepares a recommended budget, based upon the ILSP process, and submits it to the Senior Vice President, Nuclear. The actual implementation of the ILSP recommended activities cannot be initiated until the TED Board of Directors approves the recommended budget. Furthermore, if changes (i.e., cost increases, or the addition of new projects) are made to the ILSP recommended projects (See Section III) subsequent to the approval of the budget, approval of the modified budget must be obtained.

III. Schedule Identification and Modification

A. Schedule Identification -

The basic output of the TED-ILSP process will be a schedule that has rationally planned and prioritized applicable plant betterment activities as identified by TED, or required by the NRC and other agencies (i.e., INPO, EPA, FAA, OSHA, etc.). In this regard, TED has determined that this schedule will be comprised of two components, designated as the "Implementation Schedule" (IS) and the "Long Range Plan" (LRP).

Essentially TED has divided the overall schedule into two components to explicitly recognize the differences between budgeted projects (IS) to which funds have been committed and unbudgeted projects (LRP) that are available for funding in the following budget years unless a situation warrants a change during the current budget year.

The IS will include capital and major Operations and Maintenance projects approved by the TED Board of Directors in the current years budget. TED will present bar chart schedules extending over the estimated full duration for each of the projects. The LRP will identify known, but currently unbudgeted capital and major Operations and Maintenance activities. Projects included in the LRP will have projected schedules that extend over the full duration of the project similar to those in the IS. However, since LRP projects are by definition not budgeted in the current year, the earliest "start" date for the project would be January 1 of the following year. The level of confidence regarding the scheduled completion dates for projects included in both the IS and LRP will be directly related to the amount of conceptual and/or detailed engineering completed at the time the SLPW is prepared. TED will indicate the schedule completion confidence level for each of the projects included on the IS and LRP.

Included in both the IS and the LRP will be a variety of plant betterment activities, which from a regulatory perspective, have differing significance. In recognition of this fact, the types of activities that may be included have been categorized as follows:

1. Category A - Activities that have implementation dates mandated by NRC rules, orders or license conditions.
2. Category B - Davis-Besse specific NRC requirements that are not in Category A, but have been budgeted and included in the IS.
3. Category C - TED identified plant betterment activities that are included in the IS or LRP.
4. Category D - Davis-Besse specific NRC requirements that are not budgeted, but are included in the LRP.

B. Schedule Modifications

1. General

A fundamental aspect of the TED-ILSP process is the recognition that the IS and LRP must be continually revised to reflect changes in activities and completion schedules. These changes will be required to accommodate new or changed regulatory requirements; new TED identified plant betterment projects; newly identified projects with high

safety significance; or to reflect schedule accelerations or unavoidable delays resulting from IS projects maturing through the ILSP process as shown in Figure 1. Therefore, this plan identifies the process for developing schedule modifications and the explicit actions of both TED and the NRC regarding such changes.

As described previously, TED has centralized the management of the ILSP with the DBWSC and will be regularly monitoring the status of the ILSP schedule and plan through its internal project management process. Therefore, in the event delays to scheduled activities occur, the DBWSC will be aware of the situation, and will be responsible to assure that the appropriate actions are taken.

These actions include:

- a. Compensatory actions to achieve completion of the delayed project;
- b. Accelerating or decelerating completion of other budgeted projects;
- c. Recommending incorporation of projects from the LRP into the budgeted IS, or vice versa;
- d. No changes to any projects except for the delayed project;
- e. Some combination of the previously stated actions. Furthermore, as noted in Section III.B.2, opportunity exists for the NRC and TED to discuss schedule changes for projects considered significant from a regulatory and/or safety perspective, or other projects which impact the completion of projects significant to regulatory/safety perspective.

With regard to the incorporation of a new (or revised) regulatory requirement, or new (or revised) TED plant betterment activity, TED will address the new (or revised) activity consistent with its ILSP process. Specifically, upon completion of the necessary evaluations and documentation, the new activity will: 1) be submitted to the prioritization subcommittee for action; 2) be incorporated, based upon its priority designations, into the IS, or LRP. If the activity is determined to be an IS item, the Nuclear Projects Division will inform the DBWSC of whether it can be accomplished without exceeding the currently approved budget, what additional budget may be required, or what planned projects could be rescheduled to allow the new activity to be performed in light of the adopted planning constraints. If the new activity is determined to be a LRP item, the Nuclear Facility Engineering Division will

incorporate the project into the existing LRP. The DBWSC will recommend appropriate action to the Senior Vice President, Nuclear and assure that the TED actions are satisfied.

2. TED Actions

TED has the following actions regarding coordination with the NRC of modifications to the IS and the LRP:

- a. Category A items - Scheduled completion dates for Category A items, whether on the IS or the LRP will be modified only upon receipt of prior approval from the NRC, in accordance with applicable NRC regulations.

TED will inform the NRR Project Manager for Davis-Besse when serious consideration is being given to requesting a change in the completion dates³ for Category A items.

- b. Category B items - TED will inform its NRR Project Manager when a change is made to the scheduled completion date for a Category B item. TED will provide the NRC with written notification of a change including the basis for the change and any compensatory action initiated.

NRC may request further explanation or documentation (i.e. detailed schedules, etc.), or discussion concerning such changes. In this event, discussions will be

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- 3 The IS and the LRP will contain sufficient detail to identify those items with completion dates keyed to fuel cycle (planned) outages. For such items, a change in outage period shall not be considered a schedule modification. In addition, for items in the IS and LRP, changes to project completion dates prior to completion of design (SLPW Activity 2) shall not be considered a schedule modification.
 - 4 For purposes of responsibility discussions in this Plan, changes to scheduled dates for intermediate activities (SLPW Activities 1-6) that do not jeopardize, or change the scheduled completion date (SLPW Activity 7), do not require prior NRC approval, or notification. Activity 7 is called turnover and test. When Activity 7 is completed, TED considers implementation complete (system declared operational); startup & test complete; new procedures developed, approved; operator training complete and DCN's available on drawings. All completion dates given by TED on the IS and LRP represent the projected date for completion of SLPW Activity 7. It should be noted that TED considers punch list items and final document closeout (SLPW Activity 8) to occur after project completion. Closeout is typically scheduled over a seven-month period following the completion of Activity 7. TED maintains a schedule status of IS tasks in Activity 8. Although this is not part of the semi-annual submittal, this schedule status can be made available for NRC review.

initiated with the NRR Project Manager. However, all changes in Category B scheduled completion dates will be effective 30 days following written notification to the NRR Project Manager and will remain so unless subsequently modified as a result of mutual discussions between the NRC and TED. TED will be prepared to discuss the nature of the proposed changes, the impact of the proposed change on other IS projects and re-evaluation of any projects previously decelerated.

- c) Category C items - As part of the semi-annual update of the IS and LRP (See Section IV), TED will advise NRC of changes to Category C items. With the exception of the situation indicated below, prior notification to the NRR Project Manager of changes to items in this category will not be required.

If, however, TED modifies a Category C IS item completion date that was previously the basis for modifying the completion date for a Category A item, TED will provide the NRC with written notification of the change. The written notification will include the basis for the change and any compensatory action initiated. All changes in these type Category C schedule completion dates will be effective 30 days following written notification to the NRR Project Manager and will remain so unless subsequently modified as a result of mutual discussions with the NRC and TED. TED will be prepared to discuss the nature of the proposed changes, the impact of the proposed change on other IS projects and re-evaluation of any projects previously decelerated.

- d. Category D items - as part of the semi-annual update of the LRP (See Section IV), TED will advise the NRC of changes to Category D items. All changes to Category D scheduled completion dates will be effective 30 days following the semi-annually update notification to the NRR Project Manager and will remain so unless subsequently modified as a result of mutual discussions with the NRC and TED.

Completion dates of Category A,B,C or D items may be tied to the projected end date of a planned refueling outage. Since the start and finish dates of a refueling outage are not fixed and could be either accelerated or delayed, due to various conditions, TED will identify each item on the schedule submittals, whose completion date is tied to a specific refueling outage.

3. NRC Actions

It is recognized that formal NRC regulatory actions may: 1) impose a new regulatory requirement with a fixed date; or 2) establish a firm date for a previously identified regulatory requirement. In addition, the NRC may identify new regulatory issues that could ultimately be determined to be plant specific to Davis-Besse requiring a nuclear program change (i.e., procedural, staffing, etc.) or a plant system modification, or both.

In taking any of the actions identified above, the NRC, to the extent consistent with its' overall regulatory responsibilities and, unless public health or safety require otherwise, will recognize TED's ILSP process as set forth in this Plan. Specifically, the NRC will not specify completion dates, but will request TED to incorporate the new requirement into its ILSP process and to respond to the NRC regarding completion of the requirement consistent with its priority relative to the items already in the IS and LRP.

The response time normally required to evaluate a new requirement through the TED ILSP process is approximately three to six months⁵. This time is necessary to evaluate each new requirement (issue) consistent with Plan Section III.B.1.

For new regulatory items considered by the NRC to be applicable for inclusion in the IS or LRP, TED shall inform the NRC of the proposed schedule as part of the semi-annual update (See Section IV). If this six month update is not sufficiently responsive, the NRC may request an expedited schedular commitment for a specific regulatory item.

IV. Program Implementation and Enforcement

A. Actions -

The primary TED interface with the NRC regarding this Plan and its implementation will be the Nuclear Licensing Manager.

The primary NRC interface with TED regarding this Plan and its implementation will be the NRR Project Manager for Davis-Besse.

TED will copy both the Director, Division of Engineering and Technical Programs in Region III and the Site Resident Inspector

5 The NRC typically requires licensees to commit to a completion date in 60 days. When this is not possible, TED will submit an extension request. The request shall identify the reason(s) and time required to produce and commit, to a reasonable completion date.

on correspondence relevant to the Plan. However, for purposes of consistency and accountability, the imposition of new NRC regulatory requirements that are to be considered for inclusion in the ILSP - IS or LRP shall be formally submitted to TED through NRC Headquarters.

B. Schedule Enforcement -

Neither the IS nor the LRP are considered to be formal parts of this Plan, or associated license amendment. However, consistent with applicable NRC regulations, Category A items represent formal regulatory commitments. In addition, consistent with the provisions of Section III - B.2 of this Plan, for Category B items and specific Category C items TED is required to notify NRC of completion schedule changes thereto. In this regard, enforcement of these schedule commitments under applicable NRC requirements* should be consistent with the provisions of the Plan and apply to completion dates only, and not to intermediate activity schedule dates.

*NOTE: The ILSP Plan and associated management procedures do not fall under the licensee's QA Program and Appendix B does not apply. An audit of the ILSP by the NRC should be limited to identification that the schedules for the TED ILSP Plan exist and that the supporting documentation required by this plan and the supporting correspondence for changes to the schedule is maintained.

On a semi-annual basis, commencing approximately six (6) months following approval of this Plan, TED will update the IS and LRP in a Schedule Change Package and advise NRC of their status. Specifically, the TED Schedule Change Package will:

- ° Summarize progress in implementation of Category A and B projects.
- ° If applicable, document the reasons for schedule changes associated with Category A and P projects (i.e., documentation to include detailed schedules and the DBWSC approved prioritization list).
- ° Identify item or completion date changes to the IS and LRP since the last update.

The updated IS and LRP schedules submitted as part of the Schedule Change Package represent summary level schedule information. This is necessary since many items in the schedule are studies or projects in early stages of conceptual design (SLPW Activity 1) or detailed design (SLPW Activity 2). Upon completion of detailed design, it normally takes 8 to 16 weeks to prepare the detailed implementation schedule (SLPW Activities 4-7). Occasionally, in evaluating the TED Schedule Change Package, TED recognizes that the NRR Project Manager may request to see a specific project's detailed implementation schedule to formally approve the overall IS and LRP schedule submittal.

C. Plan Modification

The licensee and the NRC recognize that the Plan itself may require future modification. Upon license amendment approval of the TED Plan, future revisions to the Plan will not require a license amendment, but will be formally submitted to the NRR Project Manager. This submittal will accompany the schedule updates of the IS or will be submitted separately at a mutually convenient time. Proposed changes will be discussed with the NRR Project Manager and NRR comments incorporated, prior to the formal Plan revision submittal. The Plan revision shall become effective 30 days following formal (written) notification to the NRR Project Manager.

D. NRC Actions

Formal notification of the acceptance or comments pertaining to future Schedule Change Packages or Plan modifications will be issued by the NRC within 30 days of the submittal.

FIGURE 1

Toledo Edison Company
INTEGRATED LIVING SCHEDULE PROGRAM
Simplified Process Flow

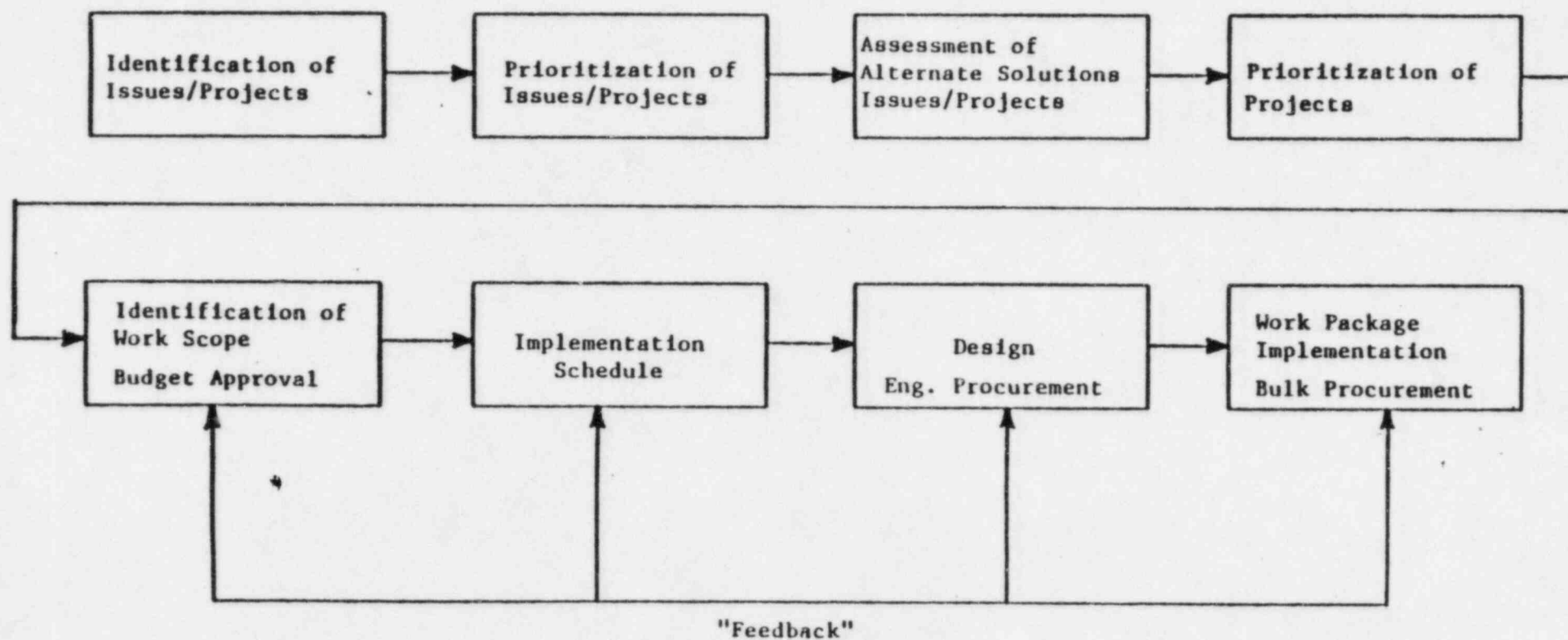
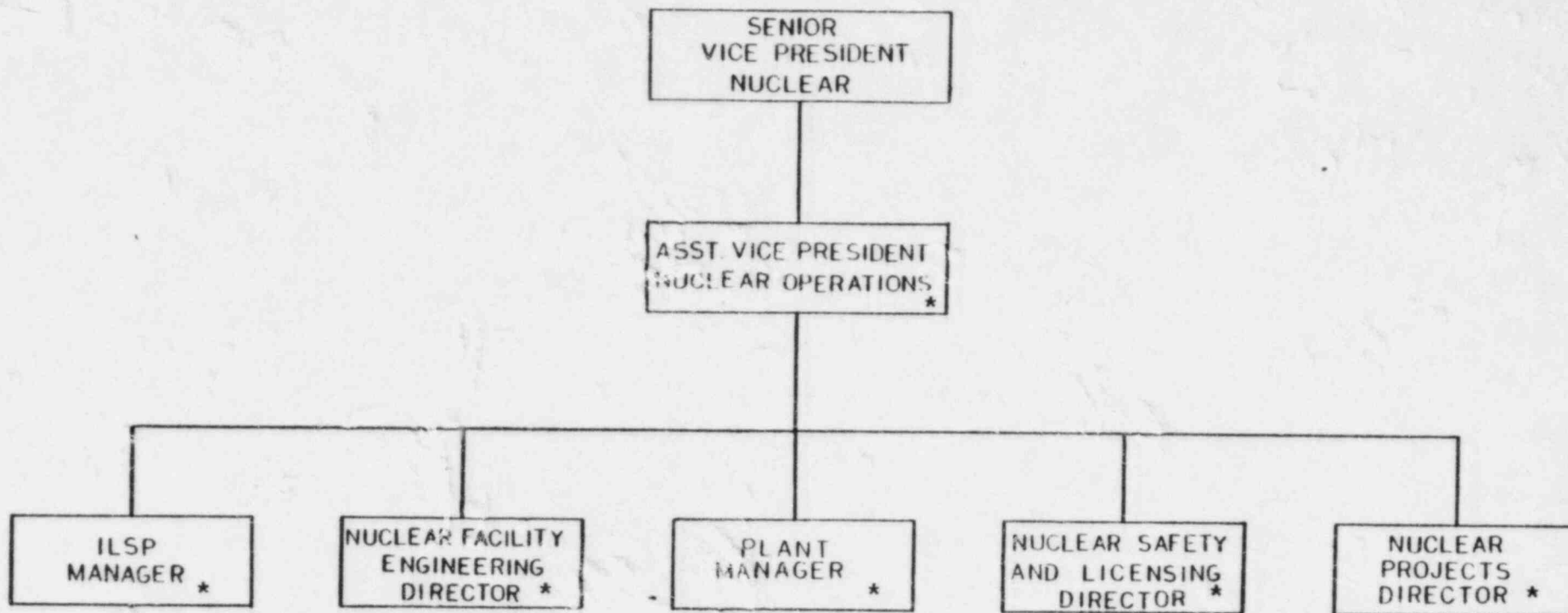


FIGURE 2

DAVIS-BESSE WORK SCOPE COMMITTEE (DBWSC)



* DAVIS-BESSE WORK SCOPE COMMITTEE MEMBERS

EFFECTIVE DATE JULY 1, 1985

FIGURE 3

SUMMARY LEVEL PLAN

SUMMARY LEVEL PLAN																																							
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