

JUL 8 1985

Docket No. 50-346

Toledo Edison Company
ATTN: Mr. Richard P. Crouse
Vice President
Nuclear
Edison Plaza
300 Madison Avenue
Toledo, OH 43652

Gentlemen:

We recently received an NRC interpretation regarding independent verification of tagging equipment out of service. Even though the interpretation, a copy of which is attached, relates to another Region III facility, it does impact the validity of a violation identified in NRC Inspection Report No. 50-346/84-09 for the Davis Besse facility. As a result, we are deleting Violation No. 346/84-09-02 from our records.

Although independent verification of proper system line-up on safety-related systems and components at the time they are removed from service is not required through your commitment to ANSI N18.7-1972, we continue to believe that the verification is an important and prudent activity which should be accomplished. Accordingly, we hope that you continue your activities in this regard.

We regret any inconvenience this may have caused. If you have any questions on this matter, please contact Mr. Frank Hawkins (312-790-5555) of my staff.

Sincerely,

"Original Signed by R. L. Spessard"
R. L. Spessard, Director
Division of Reactor Safety

Attachment: As Stated

cc w/Attachment:
S. Quennoz, Plant Manager
DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
Harold W. Kohn, Ohio EPA
James W. Harris, State of Ohio
Robert H. Quillin, Ohio
Department of Health

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PDR ADOCK 05000346
Q PDR

RIII
Choules/lc
7/5/85

RIII
Hawkins
7/8

RIII
Jackiw

RIII
Keyes
7/8

RIII
Spessard
7/8

RIII
Keyes
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

June 6, 1985

MEMORANDUM FOR: R. L. Spessard, Director
Division of Reactor Safety
Region III

FROM: Hugh L. Thompson, Jr., Director
Division of Licensing
Office of Nuclear Reactor Regulation

SUBJECT: ZION 1 AND 2 -- INDEPENDENT VERIFICATION OF TAGGING
EQUIPMENT OUT OF SERVICE

TIA Task No. 85-17 requests our assistance in providing to Region III (1) our interpretation of requirements of NUREG-0737 Section I.C.6 relative to independent verification of tagging equipment out of service and (2) our assessment of whether Zion verification practices satisfy I.C.6. The documentation regarding this matter is composed of a February 23, 1985 memorandum from R. L. Spessard to H. L. Thompson, with enclosures. We have reviewed that documentation and provide below our evaluation.

We note that the word "should" as used in the ANSI Standard is defined to mean a recommendation. A similar connotation applies to the word "should" as used by the NRC staff. The words "where appropriate" are undefined in the ANSI Standard and thus are vague as to their precise meaning.

The licensee correctly notes that the 1972 version of the ANSI Standard, to which the licensee is committed, requires "independent verification, where appropriate, to ensure that necessary measures, such as tagging equipment, have been implemented correctly." These same words are continued in the 1976 version of the Standard (5.2.6). Thus, in our view, the licensee was not committed to provide independent verification of tag-out of equipment important to safety unless he chose to interpret the words "where appropriate" as including such equipment.

Common sense and actual experience tell us, however, that unsafe conditions can develop when the wrong equipment is tagged out of service as well as when equipment is being put back into service. Therefore, we believe that independent verification is needed to assure that the proper equipment has been tagged out. That position is reinforced, we believe, by the 1982 version of ANSI/ANS 3.2. The applicable section (5.2.6) of this version presents a significantly stronger, more positive, statement concerning this matter than did the 1972 version to which the licensee had committed. The appropriate portion is quoted below.

"When a system important to safety is removed from service, independent verification shall be provided to the extent necessary to assure that the proper system was removed. This may be accomplished by checking appropriate equipment and controls, or by indirect means such as observation of indicators and status lights. This requirement may be waived if the only way of accomplishing it would result in significant radiation exposure."


CONTACT:
J. Norris
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June 6, 1985

We note that the licensee has committed to "require independent verification of proper system line-up on safety-related systems/components at the time the equipment is removed from service", see the licensee's letter of February 19, 1985; Enclosure 5 to Mr. Spessard's 2/28/85 request to Mr. Thompson. It appears that Commonwealth Edison Company has seen the desirability of such verification.

In summary, we feel that commitment to ANSI N18.7-1972 does not commit a licensee to independent verification of equipment tag out. The wording of the Standard certainly suggests that such independent verification be performed, but it does not require it. The wording of NUREG-0737 also strongly suggests that independent verification of equipment tag out be performed, but does not require it. We, thus, conclude that the licensee is correct in his contention that the charge of noncompliance is incorrect and should be withdrawn. At the same time, however, we feel that independent verification of the correctness of tag-out of equipment important to safety is an important step that should be taken by all licensees. We are pleased to note that Commonwealth Edison has committed to change the procedures at all of its nuclear stations to require such independent verification in the future.


Hugh L. Thompson, Jr., Director
Division of Licensing
Office of Nuclear Reactor Regulation

cc:

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