

Docket No. 50-346

License No. NPF-3

Serial No. 1164

July 9, 1985



Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz
Operating Reactor Branch No. 4
Division of Operating Reactors
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Stolz:

By letter dated April 2, 1985 (Log 1726), the NRC staff requested additional information to complete evaluation of Toledo Edison Company's (TED) response to Generic Letter 83-28 submitted to the NRC on November 7, 1983 (Serial 1000). Specifically, the NRC requested TED's response relative to Item 4.4 and 4.5, Reactor Trip System Reliability, for Davis-Besse Nuclear Power Station Unit No. 1.

Attachment 1 provides TED's response to the requested additional information with respect to Items 4.4, 4.5.2 and 4.5.3. Attachment 2 provides a clarification of Item 4.5.1 as requested per a May 16, 1985, telecon with Mr. A. DeAgazio (NRC/NRR Project Manager) and Mr. T. Taylor (NRC Region III). Attachment 2 also addresses proposed technical specifications for testing of the silicon controlled rectifiers in accordance with Generic Letter 85-10 dated May 23, 1985 (Log 1756).

Very truly yours,

Joe Williams, Jr.
Senior Vice President, Nuclear

JW:SGW:DLM

cc: DB-1 NRC Resident Inspector

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REQUEST FOR ADDITIONAL INFORMATION - RESPONSE TO GENERIC LETTER 83-28

Item 4.4: Your response states that TED will not comply with this requirement. We note that procedures have been developed by B&W which can be applied both to existing and new B&W reactors; therefore, we need additional information regarding your assertion that safety-related maintenance and test procedures cannot be implemented on Davis-Pesse 1. Please provide such additional information or implement safety-related test and maintenance procedures for the SCR's.

Response: In December, 1983, through the B&W Regulatory Response Group, Toledo Edison committed to modify the Control Rod Drive Control System (CRDCS) within a single cabinet chassis to provide for independent testing of the trip signal to the silicon controlled rectifiers (SCR's). This test capability was installed during the 1984 Refueling Outage. Accordingly, Toledo Edison will apply safety-related maintenance and test procedures to the reactor trip feature that interrupts power to the control rods through the silicon controlled rectifiers.

Item 4.5.2: Your response is incomplete. Please indicate what hardware changes would be required to apply safety-related test and maintenance procedures to the SCR trip devices.

Response: As specified in Item 4.4 above, modifications have been completed.

Item 4.5.3: Your response is incomplete. TED shall supply complete information on the Owner's Group analysis program, complete information covering the plant specific concerns of implementing the results of the Owner's Group program, and any change to the Technical Specifications.

Response: Toledo Edison provided information specific to Davis-Besse Unit 1 from the Owner's Group analysis program in our letter of February 15, 1985 (Serial 1126). In addition, the Babcock & Wilcox Owner's Group provided information on the Item 4.5.3 in a letter to Mr. H. Thompson dated April 8, 1985. These two submittals demonstrate that the current on-line test interval for the Reactor Trip System (RTS) is consistent with high RTS availability. Consequently, no changes to technical specifications are deemed necessary.

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In a telephone conference on May 16, 1985 with A. DeAgazio (NRC/NRR Project Manager) and T. Taylor (NRC Region III), it was requested that Toledo Edison clarify its response to Item 4.5.1, in particular the frequency of testing the shunt trip devices. In our initial response of November 7, 1983 (Serial 1000), Toledo Edison identified that independent testing of the shunt trip device would be performed on an eighteen month cycle. Our letter of June 22, 1984 (Serial 1054), identified the modification that was implemented on the shunt trip device and that surveillance testing would be accomplished by performing a CHANNEL FUNCTIONAL TEST of the Control Rod Drive Trip Breaker on a monthly basis. Additionally, a license amendment application was submitted on May 29, 1985 (Serial 1155) which provides for testing to independently confirm the operability of the shunt and undervoltage trip devices.

In addition, as a result of Generic Letter 85-10, Technical Specifications for Generic Letter 83-28, Items 4.3 and 4.4, Toledo Edison will submit proposed technical specifications for testing of the silicon controlled rectifiers trip signals. The appropriate test interval will be established in this submittal. The schedule for this submittal will be worked out with A. DeAgazio (NRC/NRR Project Manager) as specified in Generic Letter 85-10.