

JUL 15 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:

Thank you for your letter dated May 17, 1985, informing us of the steps you have taken to correct the violation which we brought to your attention in Inspection Report No. 50-346/85008(DRS), forwarded by our letter dated April 17, 1985.

With regard to your response, we reviewed the Safety Evaluation Report dated May 18, 1984, item II.B.1.g and the requirements delineated in the 1977 Edition of Section XI of the American Society of Mechanical Engineers' Boiler and Pressure Vessel Code, Subsections IWV-3426 and IWV-3427. While trending of valve leak rates is not explicitly required by the Code, it would be impossible to determine whether leak rates projected "based on three or more tests" would indicate "that the leakage rate of the next scheduled test" would exceed the acceptance criteria. In your response, you stated that "local leak testing was conducted during the 1984 Refueling Outage and provided the first leakage rate measurements to be compared under the new requirement to comply with the ASME Code Subsection IWV-3426 and 3427". 10 CFR 50.55a(g).4.i states that inservice testing shall comply with the appropriate edition of the ASME Code, which in this case is the 1977 Edition including Addenda through Winter 1978, unless specific relief is granted by the Commission. Although the Safety Evaluation Report was issued in May, 1984, you committed to the 1977 Code in your revised submittal dated May 15, 1980. The requirements of IWV-3426 and IWV3427 are quite clear and evaluations of the three tests conducted prior to the 1984 test must be analyzed per the Code criteria. While the staff agrees that the comparison of leak test data obtained via Surveillance Test ST 5061.02 against the Bechtel guidelines is a good engineering practice, such comparisons are required per Subsection IWV-3426. The requirements of IWV-3426 and IWV-3427 apply to all valves requiring leak rate measurements, including pressure isolation valves. Revisions to procedures regarding the evaluation and trending for valves requiring leak testing in addition to ST 5061.02, must be initiated. It was noted during the inspection that no method nor provision for the evaluation required by the Code was planned to be implemented.

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Therefore, we do not agree with your position that you have not been contrary to the requirements of Section XI of the ASME Code. Your actions in this regard will be reviewed in subsequent inspections.

Your cooperation with us is appreciated.

Sincerely,

for *Carl Paperella*
R. L. Spessard, Director
Division of Reactor Safety

cc w/ltr dtd 5/17/85:
T. D. Murray, Station
Superintendent
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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