Docket No. 50-346

License No. NPF-3

Serial No. 1-526

May 17, 1985

TOLEDO EDISON

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Vice President
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(419) 249-5221

Mr. C. E. Norelius, Director
Division of Reactor Projects
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Norelius:

Toledo Edison acknowledges receipt of your April 17, 1985 letter (Log No. 1-1152), and enclosures, Notice of Violation, and Inspection Report No. 50-346/85008 (DRS).

Toledo Edison believes that we have not been contrary to the requirements of Section XI of the ASME Code as stated in the Notice of Violation, in that Toledo Edison "failed to trend and evaluate leak rate data". Trend analysis is not explicitly required by ASME Code.

Following an examination of the item of concern, Toledo Edison herein offers information regarding this item.

1. Violation: Davis-Besse Technical Specification 4.0.5 requires that an inservice testing program for pumps and valves be established and conducted per the requirements of the appropriate edition of Section XI of the ASME Code. ASME Code subsections IWV-3426 and 3427 require that leakage rate measurements for Category A valves be compared with previous measurements and specific limits and that valves exhibiting specified leak rate increases or exceeding stated limits be tested at an increased frequency or undergo corrective action, respectively.

Contrary to the above, the licensee failed to trend and evaluate valve leak rate data per the requirements of Section XI.

This is a Severity Level V violation (Supplement 1). (85008-02)

MAY 20 1985

Response: (1) Corrective action taken and results achieved.

Item II.B.1.G, Category A Valve Leak Check Requirements for Containment Isolation Valves (CIV's), in the Inservice Test Program Safety Evaluation Report (SER) (Log 1521), dated May 18, 1984, states, "The licensee shall comply with Paragraph IWV-3426, Analysis of Leakage Rates, and IWV-3427, Corrective Action, unless relief is requested and granted." This SER item also gave these valves Category A status for the first time and concluded that Appendix J Type C testing meets the intent of IWV-3420 through 3425.

ASME Code Subsection, IWV-3426, states, "Leakage rate measurements shall be compared with previous measurements and with the permissible leakage rates specified by the plant owner for a specific valve." Additionally, IWV-3427 states, "If tests show a leakage rate increasing with time for valves six inches nominal pipe size or larger, and a projection based on three or more tests indicates that the leakage rate of the next scheduled test will exceed the maximum permissible leakage rate by greater than 10%, the valve shall be replaced or repaired."

Local Leak Rate testing per Surveillance Test ST 5061.02, Containment Vessel Local Leak Rate Test, 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.

Toledo Edison has, in the past, as a good engineering practice, compared the Surveillance Test ST 5061.02 leak rate data against Bechtel guidelines provided in a April 2, 1975 letter. The Bechtel guidelines provide a guide for what should be expected (reasonable leakage rate) and a maximum leakage rate for identifying those penetrations which are becoming problem areas. In most cases, if a value or penetration leak rate exceed the maximum leakage rate, corrective action was taken.

A comparison of penetration leakage rates following post maintenance is required per Surveillance Test ST 5061.02. This compares previous leakage rates to post maintenance leakage rates for acceptability.

(2) Corrective action to be taken to avoid further non-compliance.

Toledo Edison will revise Surveillance Test ST 5061.02 to clarify the requirement to compare leak rate measurements with previous measurement and with the permissible leakage rates.

Additionally, the corrective action guidelines specified in ASME Code Subsection IWV-3427 will be incorporated in Surveillance Test ST 5061.02.

(3) Date when full compliance will be achieved.

Full compliance will be achieved prior to the next refueling outage Local Leak Rate Testing.

Very truly yours,

RC Crouse/KKB

RPC:ECC:SGW:nlf
cc: DB-1 NRC Resident Inspector