

OCT 17 1985

CONFIRMATORY ACTION LETTER

Docket No. 50-346

CAL RIII-85-13

Toledo Edison Company
ATTN: Mr. Joe Williams, Jr.
Senior Vice President
Nuclear
Edison Plaza
300 Madison Avenue
Toledo, OH 43652

Gentlemen:

This letter confirms the matters discussed during a meeting at the Davis-Besse site on October 9, 1985, between Mr. Carl J. Paperiello and others of this office and you and others of your staff and a subsequent telephone discussion between Mr. J. Harrison of my staff and Mr. D. Wuokko of your staff on October 16, 1985, relating to piping systems support inspections/walkdowns and resulting engineering evaluations and corrective actions. The supports covered under this effort are those located on nuclear safety-related and seismic Category 1 piping systems within the scope of IE Bulletin 79-14. With regard to the matters discussed, we understand that you plan to accomplish the following:

1. Phase I - Prior to Restart

a. Actions

- (1) Complete inspections/walkdowns utilizing Toledo Edison Company (TED) procedures on the piping system supports identified in Item 1.b and all other safety-related piping system supports inside containment not listed in Item 1.b, and issue nonconformance reports (NCRs) as appropriate.
- (2) Resolve any resulting NCRs for those piping system supports listed in Item 1.b including the completion of any necessary corrective actions to achieve piping system operability based on FSAR commitments/IE Bulletin 79-14 interim allowable stresses.
- (3) Screen any resulting NCRs for safety-related piping system supports inside containment not listed in Item 1.b and resolve those NCRs that are determined to be significant relative to system operability.
- (4) Complete and close engineering evaluations for all open Facility Change Requests (FCRs) that relate to completed modifications which could impact piping system operability listed in Item 1.b.

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- (5) From the results obtained from actions delineated in Items 1.a.(2) and 1.a.(3), provide a basis for not performing inspections/walkdowns and resolution of resulting NCRs for all safety-related piping system supports not listed in Item 1.b.

b. Systems

(1) Outside Containment:

- High Pressure Injection
- Low Pressure Injection/Decay Heat Removal
- Auxiliary Feedwater*
- Auxiliary Feedwater Turbine Steam Supply*

(2) Inside Containment:

- High Pressure Injection
- Low Pressure Injection/Decay Heat Removal
- Auxiliary Feedwater*
- Containment Spray (accessible portion)
- Core Flood
- Hydrogen Dilution
- Pressurizer Relief

* The results of reviews and engineering evaluations for these systems do not have to be considered when determining the operability basis (see Item 1.a.(5)) of safety-related piping systems not listed in 1.b.(1) and 1.b.(2) above.

2. Phase II - After Restart

- a. Complete inspections/walkdowns utilizing TED procedures on all safety-related piping system supports outside containment not listed in Item 1.b and issue NCRs as appropriate.
- b. Resolve all outstanding NCRs issued as a result of the inspections/walkdowns on all safety-related piping system supports including any necessary corrective actions relating to system operability based on FSAR commitments/IE Bulletin 79-14 interim allowable stresses. All NCR evaluations and corrective actions will be completed as soon as reasonably possible and comply with applicable action statements in the Technical Specifications, including prompt reporting.
- c. Complete and close engineering evaluations for all open FCRs that are related to piping system modifications completed as of the date of this letter, which impact the operability of all safety-related piping systems.

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3. Phase III - By The End Of The Next Refueling Outage

Restore all safety-related piping systems to FSAR commitments.

If TED determines that specific supports should be exempted from inspection/evaluation based on adverse location; e.g., high radiation areas, inaccessability, etc., TED shall request such exemptions for these supports from Region III and provide the bases for the exemptions.

Please advise us immediately if your understanding of these items differs from that set forth above.

Sincerely,

James G. Keppler
Regional Administrator

cc: L. Storz, Plant Manager
DCS/RSB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
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