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Docket Number 50-346

License Number NPF-3

Serial Number 1-1115

January 27, 1997

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

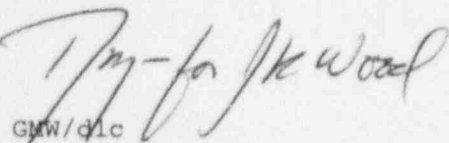
Subject: Response to NRC Inspection Report Number 50-346/96006

Ladies and Gentlemen:

Toledo Edison has received Inspection Report 96006 (Log Number 1-3777) and the enclosed Notice of Violation. The violation involves three separate events regarding test control. The Response to the Notice of Violation is attached.

Should you have any questions or require additional information, please contact Mr. James L. Freels, Manager - Regulatory Affairs, at (419) 321-8466.

Very truly yours,

  
JMW/dlc

cc: A. B. Beach, Regional Administrator, NRC Region III  
A. G. Hansen, NRC Project Manager  
S. Stasek, DB-1 NRC Senior Resident Inspector  
Utility Radiological Safety Board

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Reply to Notice of Violation (50-346/96006-01A, -01B, & -01C(DRP))

Alleged Violation

10 CFR 50, Appendix B, Criterion XI, "Test Control," states, in part, that, "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. The test program shall include, as appropriate...operational tests during nuclear power plant...operation, of structures, systems, and components. Test procedures shall include provisions for assuring that all prerequisites for the given test are met...and the test is performed under suitable environmental conditions. Test results shall be documented and evaluated to assure that test requirements have been satisfied."

- a. Administrative procedure DB-DP-00013, "Surveillance and Periodic Test Program" (Revision 04), defined a test deficiency as, "Any deviation from a test procedure requirement or acceptance criteria which is identified during the conduct of a test, or during the review of the test results."

Paragraph 6.3.8 of DB-DP-00013, stated, in part, that "Test deficiencies...shall be documented on the Test Deficiency List (Form)..."

Contrary to the above, on September 25, 1996, while performing surveillance DB-SP-03161, "Auxiliary Feedwater Train 2 Level Control, Interlock, and Flow Test," (Revision 04), NRC inspectors identified that an operator failed to identify and document test deficiencies when, on two occasions, he misoperated a stopwatch used to stroke time a valve.

- b. Surveillance procedure DB-SP-03338, "Containment Spray Train 2 Quarterly Pump and Valve Test" (Revision 02), specified in notes preceding steps 4.11 and 4.27 that, "For valve CS1531...the stroke time will be measured with a stopwatch at the motor control center (MCC) while the valve is stroked from the Control Room."

Contrary to the above, on September 6, 1996, during performance of DB-SP-03338, NRC inspectors identified that the stroke time for valve CS1531 was measured from the control room and not at the MCC on two occasions.

- c. Contrary to the above, NRC inspectors identified surveillance procedures DB-SS-03254, "Emergency Ventilation System Train 1 18-Month SFAS Drawdown Test" (Revision 02), and DB-SS-03255, "Emergency Ventilation System Train 2 18-Month SFAS Drawdown Test" (Revision 02), used to verify the integrity of the auxiliary building active pressure boundary (NPB), failed to establish adequate test controls to confirm the proper functioning of NPB floor drain wafer check valves. Although soluble plastic material was routinely used to seal one or more floor drains in the auxiliary building (including floor drains within the NPB) for contamination control purposes, placement/removal of the plastic was not otherwise tracked or controlled. DB-SS-03254 and DB-SS-03255 did not include prerequisites to verify the floor drains within the NPB were free of plastic prior to conducting drawdown testing.

This is a Severity Level IV violation (Supplement 1).

Reason for Violation Example a.

The cause of this violation was a failure of the individual performing the test to follow procedures. The individual performing the test overlooked the requirement specified in DB-DP-00013 that any deviation shall be documented on the Test Deficiency List. The Notice of Violation states that the operator "misoperated" the stopwatch, when in fact, the stopwatch malfunctioned during the test performance. This has been a recurring problem at the Davis-Besse Nuclear Power Station (DBNPS), and a Potential Condition Adverse to Quality Report (PCAQR 96-1346) was initiated on October 16, 1996, to document this issue. New stopwatches are being purchased to alleviate this problem. Because of this common problem and (in the operator's mind) the minor impact of this problem on the performance of the test, the operator did not feel it was necessary to initiate a Test Deficiency when the stopwatch malfunctioned. However, since the stopwatch malfunction did impact plant equipment in that the particular test must be re-performed to meet the acceptance criteria, a Test Deficiency should have been written.

Corrective Actions Taken and Results Achieved

The requirement to initiate a Test Deficiency for any deviation from a test procedure requirement or acceptance criteria was verbally communicated to all on-shift licensed Senior Reactor Operators by Operations Management for dissemination to all operations personnel. This action was completed on November 20, 1996.

Corrective Actions to Prevent Recurrence

No further actions beyond the verbal communication by Operations Management of the requirements for documenting test deficiencies is required.

Date When Full Compliance Will Be Achieved

Full compliance was achieved following completion of training of all on-shift operations personnel on November 20, 1996.

Reason for Violation Example b.

The applicable procedure steps directed the operator to close the valve while measuring the time for the valve to stroke closed. The information detailing where the operator was to measure the stroke time was contained in a note prior to the procedure steps. The operator performing the valve stroke failed to read the note regarding the required location for performing the valve stroke. It is acceptable to place information in a note that provides further clarification of the procedure step, as long as information is not required to properly perform the procedure step. In this example, this information was necessary to properly perform the procedure step, and therefore should have been contained within the procedure step.

Corrective Actions Taken and Results Achieved

The failure to apply the information in the note was realized prior to test completion, so a test deficiency was initiated, and the applicable steps were performed again, with the valve stroke time being measured from the breaker contactors.

Corrective Actions to Prevent Recurrence

Procedures DB-SP-03337 and DB-SP-03338, Containment Spray Train 1 and 2 Quarterly Pump and Valve Tests were revised to include the required stroke time location in the procedure steps. These procedure revisions were complete on January 23, 1997.

Date When Full Compliance Will Be Achieved

Full compliance was achieved September 6, 1996, when the applicable steps were performed again, with the valve stroke time being measured from the breaker contactors.

Reason for Violation Example c.

Soluble plastic material is routinely used to seal floor drains in the auxiliary building for contamination control purposes. The fact that this plastic could conceal a malfunctioning floor drain wafer check valve may not have been considered during development of the Emergency Ventilation System drawdown tests, and therefore no guidance was given in the tests to remove the plastic prior to test performance.

Corrective Actions Taken and Results Achieved

The Emergency Ventilation System is designed to drawdown the negative pressure area with an opening as large as 345 square inches. Based on prior drawdown testing, the total baseline opening of the negative pressure boundary is approximately 302 square inches. This leaves approximately 43 square inches available to accommodate other openings in the negative pressure boundary. The failed floor drain wafer check valve represented only an additional 13 square inch opening. Based on this, when this issue of testing with the floor drains covered was raised on July 29, 1996, it was determined that the Emergency Ventilation System would still be capable of performing its intended function. This was confirmed by satisfactorily performing DB-SS-03255 for Emergency Ventilation System Train 2 on July 30, 1996, with the floor drains not covered. DB-SS-03254 was satisfactorily performed for Emergency Ventilation System Train 1 on August 24, 1996, also with the floor drains not covered.

Corrective Actions to Prevent Recurrence

Procedures DB-SS-03254 and DB-SP-03255 are being revised to add a step to verify that all floor drains within the negative pressure boundary are free of plastic prior to conducting drawdown testing. These procedure revisions will be completed by February 28, 1997.

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Attachment 1

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Date When Full Compliance Will Be Achieved

Full compliance was achieved on July 30, 1996, when DB-SS-03255 was satisfactorily performed with the floor drains in the negative pressure boundary not covered.