

Docket No. 50-346

License No. NPF-3

Serial No. 1-541

July 1, 1985



Mr. James G. Keppler, Regional Administrator
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

On June 9, 1985, the Davis-Besse Nuclear Power Station, Unit 1 (DBNPS) experienced a plant trip resulting in the loss of auxiliary feedwater flow to the steam generators and other equipment anomalies. A Confirmatory Action Letter (CAL-85-06) dated June 10, 1985 (Log 1-1183), was issued to Toledo Edison.

It is Toledo Edison's understanding, based upon discussions with your Mr. Wayne Shafer, NRC Region III Branch Chief, that the NRC Fact Finding Team concurrence on our proposed corrective action(s) is not required. Our understanding of Item 1 of the CAL is as follows:

Toledo Edison is to hold in abeyance any work in progress (electrical or mechanical) and/or any work planned on equipment that malfunctioned during the event, such as dismantling or disturbing existing evidence, until the NRC Fact Finding Team has had an opportunity to evaluate the event.

In addition, prior to the start of any work activities, Toledo Edison will:

- a. Provide the NRC with plans to investigate each failure prior to troubleshooting activities.
- b. Upon completion of the investigation, the NRC shall be notified as soon as practical when the determination of the root cause of the malfunction/failure has been identified.

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- c. Notify the NRC as soon as practical of plans and schedule for corrective action work, prior to the work being performed.

Work on the below listed equipment has been held in abeyance per the Confirmatory Action Letter until the NRC Fact Finding Team's review of Toledo Edison generated Action Plans for investigation of malunions/failures.

Prior to the NRC Fact Finding Team review, Toledo Edison held in abeyance all work on the following equipment:

- Main Feed Pump Turbines and Controls
- Steam & Feed Rupture Control System and Associated Instrument Channels
- Auxiliary Feed Pump Turbines and Controls
- Main Steam Isolation Valves, Controls, Actuating Circuits and Pneumatic Supplies
- Startup Feedwater Valve SP 7A and Controls
- Source Range Nuclear Instrumentation Channels
- Turbine Bypass Valve (TBV) SP-13A2, and any other components for which there is found an indication of water hammer damage. Traps and drains associated with #2 TBV header: MS 2575, MS 737, MS 739, ST 3, ST 3A.
- Power Operated Relief Valve, Controls and Actuation System
- Main Steam Safety Valves and Atmospheric Vent Valves
- Auxiliary Feedwater Valves AF 599 and AF 608, Actuators, and Controls
- Main Steam Valve MS 106 and Controls
- Service Water Valve and Controls on Auxiliary Feedwater Alternate Supply

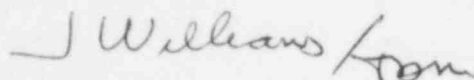
Toledo Edison has agreed to limit other work activities in the proximity of this equipment so as not to affect this equipment. This is as requested by the NRC Fact Finding Team for the June 9, 1985 Event at the Davis-Besse Nuclear Power Station.

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In a June 12, 1985, meeting with the NRC Fact Finding Team and Region III representatives, Toledo Edison was requested to walk down the Main Steam System (outside of containment) and if additional damage was found to equipment, that this equipment be held in abeyance. Toledo Edison completed a walkdown of the Main Steam System and the results are documented in procedure QCIP-037. No additional damage to equipment was identified.

Toledo Edison is striving to meet all the requirements of the NRC Fact Finding Team in a timely manner. We are prepared to fully support the NRC in the fact finding investigation.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J Williams, Jr.", followed by a horizontal line.

Joe Williams, Jr.
Senior Vice President, Nuclear

JW/SGW/bjs

cc: DB-1 NRC Resident Inspector
Dr. E. Rossi, NRC Fact Finding Team Leader