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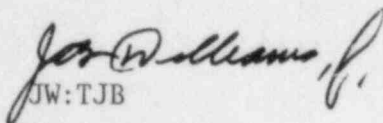
Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

The enclosed materials comprise Revision 5 to the Davis-Besse Course of Action (COA) submitted to you on September 10, 1985 (Serial No. 1182). This submittal provides Toledo Edison's response to concerns identified by the NRC Test Review Team during a meeting held at Davis-Besse on November 21, 1985 to discuss the System Review and Test Program (SRTP).

These concerns were related to the Selection of Systems for the System Review and Test Program portion of the COA. We believe that the clarifications provided in this submittal should adequately address your concerns. If you have any additional questions, please feel free to contact us.

Very truly yours,


JW:TJB

Enclosure

cc: DB-1 NRC Resident Inspector
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THIS LIST OF EFFECTIVE PAGES IS ISSUED FOR INFORMATION ONLY

VOLUME 1

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TABLE OF CONTENTS

SECTION I - INTRODUCTION

SECTION II.A

SECTION II.B.1

SECTION II.B.2

SECTION II.B.3

SECTION II.C.1

SECTION II.C.2

SECTION II.C.3

SECTION II.C.4

SECTION II.C.5

SECTION II.C.6

SECTION II.C.7

SECTION III - CONCLUSIONS

REFERENCES

ACRONYM GLOSSARY

EFFECTIVE PAGES

=====

PAGE 1

PAGE 11

PAGE 111

PAGE 1v

PAGES 01 - 08

PAGES 09 - 11

PAGES 12 - 31

PAGE 32

PAGE 33

PAGES 34, 34a, 34b,

PAGES 34c, 35

PAGES 36 - 37

PAGES 38 - 42

PAGE 43

PAGE 44

PAGE 45

PAGE 46

PAGES 47 - 56

PAGES 57 - 63

PAGES 64 - 72

PAGES 73 - 74

PAGES 75 - 77

PAGES 78 - 80

PAGES 81 - 82

PAGES 83 - 86

PAGES 87 - 89

PAGES 90 - 91

PAGE 92

PAGE 93

01 PAGE

PAGES 01 - 02

REVISION

=====

REV. 4

REV. 4

REV. 4

REV. 5

INITIAL ISSUE

INITIAL ISSUE

INITIAL ISSUE

REV. 4

INITIAL ISSUE

REV. 4

REV. 4

INITIAL ISSUE

INITIAL ISSUE

REV. 2

REV. 4

REV. 4

INITIAL ISSUE

INITIAL ISSUE

INITIAL ISSUE

INITIAL ISSUE

INITIAL ISSUE

REV. 4

INITIAL ISSUE

INITIAL ISSUE

REV. 3

INITIAL ISSUE

REV. 3

INITIAL ISSUE

REV. 4

INITIAL ISSUE

INITIAL ISSUE

VOLUME 2

=====

IV APPENDICES

APPENDIX B.1.1

D-B MGT. STRUC. ORG. CHART

NUC. ENG. DIV. ORG. CHART

PLANT MAINT. ORG. CHART

APPENDIX B.2.1

APPENDIX C.1.1

01 PAGE

PAGE 01

01 PAGE

02 PAGES

01 PAGE

PAGES 01 - 11

PAGE 01

PAGE 02

INITIAL ISSUE

REV. 4

INITIAL ISSUE

REV. 4

REV. 4

INITIAL ISSUE

INITIAL ISSUE

REV. 4

FINDINGS, CORRECTIVE ACTIONS, AND
GENERIC IMPLICATIONS REPORTS

PLAN NO. 1A & 1B/1C

PLAN NO. 1D

PLAN NO. 5, 6 & 7

PLAN NO. 8

PLAN NO. 9A/9B

PLAN NO. 15A

PLAN NO. 15B

CURRENT REV.

REV. 3

REV. 3

REV. 3

REV. 2

REV. 2

REV. 3

REV. 3

PLAN NO. 16		REV. 4
PLAN NO. 18		REV. 2
PLAN NO. 26		REV. 5
PLAN NO. 27		REV. 4
APPENDIX C.1.2	PAGE 01	INITIAL ISSUE
FINDINGS, CORRECTIVE ACTIONS AND		
GENERIC IMPLICATIONS REPORT		
PLAN NO. 12		REV. 2
APPENDIX C.1.3	PAGE 01	INITIAL ISSUE
FINDINGS, CORRECTIVE ACTIONS AND		
GENERIC IMPLICATIONS REPORT		
PLAN NO. 10		REV. 3
APPENDIX C.1.4	PAGES 01 - 02	INITIAL ISSUE
APPENDIX C.2.1	PAGES 01 - 03	INITIAL ISSUE
	PAGES 04 - 06	REV. 4
	PAGES 07 - 12	INITIAL ISSUE
APPENDIX C.2.2	PAGES 01 - 04	INITIAL ISSUE
APPENDIX C.2.3	PAGES 01 - 02	REV. 4
	PLUS ANALYSIS 182 PGS ** REV. 4	
	(including separator pages)	
APPENDIX C.3.1	PAGES 01 - 12	INITIAL ISSUE
FIGURE C.3.1.1 THRU		INITIAL ISSUE
FIGURE C.3.1.17		INITIAL ISSUE
APPENDIX C.3.2	PAGE 01	REV. 3
COVER LETTER DATED 7-16-85		INITIAL ISSUE
	PAGES 01-34 & 66	INITIAL ISSUE
	PAGES 35 - 85	NOT ISSUED*
COVER LETTER DATED 9-20-85		REV. 3
	PAGES 01 - 22	REV. 3
APPENDIX C.3.3	PAGES 01 - 06	REV. 4
LIST OF ATTACHMENTS	01 PAGE	REV. 4
PLUS TABLES OF ANALYSIS		
SFAS	27 PAGES	** REV. 4
SFAS	18 PAGES	** REV. 4
SFRCS CASE I	04 PAGES	** REV. 4
SFRCS CASE II	04 PAGES	** REV. 4
SFRCS CASE III	04 PAGES	** REV. 4
SENSOR INPUTS	01 PAGE	** REV. 4
NOTES	01 PAGE	** REV. 4
APPENDIX C.4.1	PAGES 01 - 27	REV. 4
APPENDIX C.4.2	PAGES 01 - 04	REV. 4
APPENDIX C.5.1	PAGE 1	REV. 4
	PAGES 01 - 30	** REV. 4
	44 PAGES	** REV. 4
APPENDIX C.7.1	PAGES 01 - 08	REV. 4
	PAGES 9, 9A, 9B	REV. 5
	PAGES 10, 11	REV. 4
	PAGES 12, 12A	REV. 5
	PAGES 13 - 15	REV. 4
	PAGES 16, 16A	REV. 5
	PAGES 17 - 18	REV. 4
	PAGES 19 - 20	REV. 3
	PAGES 21 - 28	REV. 4
	PAGE 29	REV. 3

APPENDIX III.1	PAGE 01	REV. 4
COMMITMENT TRACKING REPORTS		
PRE-STARTUP REPORT	25 PAGES	** REV. 4
POST-STARTUP REPORT	12 PAGES	** REV. 4
SUMMARY SCHEDULE - LEVEL 2	01 PAGE	** REV. 4
APPENDIX III.2	PAGE 01	REV. 4
TED RESPONSE TO NRC MAINT. SAFETY		
EVALUATION REPORT (SER), PAGE 1		
TED RESPONSE TO NRC MAINT. SER PAGES 1-20		
ATTACHMENT 1	85 PAGES	
ATTACHMENT 2	12 PAGES	
ATTACHMENT 3	155 PAGES	
TED RESPONSE TO REQUEST FOR ADDITIONAL		
INFORMATION (32 QUESTIONS)	COVER PAGE	** REV. 4
Q1, Q2	1 PAGE	** REV. 4
Q3	5 PAGES	** REV. 4
Q4	2 PAGES	** REV. 4
Q5	2 PAGES	** REV. 4
Q6	6 PAGES	** REV. 4
Q7	4 PAGES	** REV. 4
Q8	1 PAGE	** REV. 4
Q9	14 PAGES	** REV. 4
Q10 a - d	25 PAGES	** REV. 4
Q11	4 PAGES	** REV. 4
Q12	7 PAGES	** REV. 4
Q13 a - d	117 PAGES	** REV. 4
Q14	3 PAGES	** REV. 4
Q15	9 PAGES	** REV. 4
Q16	2 PAGES	** REV. 4
Q17	89 PAGES	** REV. 4
Q18	76 PAGES	** REV. 4
Q19	1 PAGE	** REV. 4
Q20	874 PAGES	** REV. 4
Q21	5 PAGES	** REV. 4
Q22	2 PAGES	** REV. 4
Q23	16 PAGES	** REV. 4
Q24	5 PAGES	** REV. 4
Q25	1 PAGE	** REV. 4
Q26	2 PAGES	** REV. 4
Q27	8 PAGES	** REV. 4
Q28	2 PAGES	** REV. 4
Q29	7 PAGES	** REV. 4
Q30	2 PAGES	** REV. 4
Q31	1 PAGE	** REV. 4
Q32	16 PAGES	** REV. 4
TED RESPONSE TO NRC EVALUATION OF		
ROOT CAUSE FINDING REPORTS	COVER PAGE	** REV. 4
ACTION PLAN 1A & 1B/1C	2 PAGES	** REV. 4
ACTION PLAN 1D	2 PAGES	** REV. 4
ACTION PLAN B	1 PAGE	** REV. 4
ACTION PLAN 9A/9B	7 PAGES	** REV. 4
ACTION PLAN 10	1 PAGE	** REV. 4
ACTION PLAN 12 & 27	7 PAGES	** REV. 4
ACTION PLAN 18	1 PAGE	** REV. 4
ACTION PLAN 26	5 PAGES	** REV. 4

* CONTAINS PROPRIETARY INFORMATION

** REV. 4 = INITIAL ISSUE, ISSUED IN REV. 4

NOTE: INITIAL ISSUE DOES NOT CONTAIN FOOTNOTES

TABLE OF CONTENTS

	<u>PAGE</u>
Appendix C.4.2 - Effect of Physical Security Provisions on Operations	1
Appendix C.5.1 - Specific Actions Related to Control Room Deficiencies	1
Appendix C.7.1 - Selection of Systems for the System Review and Test Program.	1
- Development and Implementation of the Restart Test Program	22
- System Review and Test Program Results.	29
Appendix III.1 - Actions to be Implemented by Toledo Edison.	1
• Pre-Startup Commitment Tracking Report	
• Post-Startup	
• Summary (Level 2) Schedule of Activities to be Completed Prior to Restart	
Appendix III.2 - NRC Questions and TED Responses	1
• TED Response to NRC Maintenance	
• Safety Evaluation Report Regarding The Maintenance Improvement Program at Davis-Besse	
• TED Responses to Request for Additional Information - 32 Questions	
• TED Responses to NRC Evaluation of Root Causes Findings Reports	

scenario. The purpose of the Containment Radiation Monitoring System is similar to the Post Accident Sampling System in that it is to be used to evaluate post accident containment conditions. This system has no active role with respect to accident initiation, control, or mitigation.

Systems and components included in Technical Specifications which were not selected for review are Seismic and Meteorological Monitoring, Radiological Liquid and Gaseous Effluent Monitoring, 345 KV Electrical, Containment Air Locks and Snubbers.

Seismic Monitoring System

Previous problems identified with the seismic monitoring system were resolved during the last (fourth) refueling outage. The system was upgraded in order to meet the NRC guidelines set forth in Regulatory Guide 1.12, Revision 1. A review of the surveillance testing performed since the system modifications indicate no significant or recurring problems. In addition, the services of the vendor have been retained on a semiannual basis for servicing of the new equipment to ensure continued operability of the system. NRC Inspection Report Item (50-346/82-01-18) concerning the need for upgrading the system's capability, writing appropriate procedures, and providing training was recently closed out and supports this position. Therefore, based on the recent system upgrade and performance, as well as the fact that the system performs no active safety function, Toledo Edison believes that this system poses no concern relative to plant operations or the public health and safety.

Meteorological Monitoring System

The meteorological monitoring system performs no active safety function. The operability of the meteorological instrumentation ensures that sufficient meteorological data are available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measures to protect the health and safety of the public.

A review has been conducted of the operational history of the meteorological monitoring equipment for the past two years and the results indicate that dose assessment capability was available approximately 99.6% of the time. This is well in excess of the 90% availability criterion specified in Regulatory Guide 1.23. Additionally, in accordance with the Toledo Edison Emergency Plan, the meteorological monitoring system capability is backed up by the ability to obtain the necessary information from the National Weather Service (Cleveland) or the Fermi Nuclear Power Plant (Monroe). Therefore, based on the systems recent performance and the provision for backup capability, this system poses no concern relative to plant operations or to the public health and safety.

Radiological Liquid and Gaseous Effluent Monitoring Instrumentation

The monitoring instruments which make up the Radioactive Liquid and Gaseous Effluent Monitoring Systems are subjected to frequent surveillance tests, which have indicated no generic or major problems. Both liquid and gaseous effluent monitoring capabilities are examined annually in conjunction with the NRC's Confirmatory Measurement Program. The demonstrated conformance of these systems to Technical Specification requirements leads Toledo Edison to conclude that a review of these systems is not required.

Certain monitors are included in the review of systems that were selected for inclusion in the SRTP. The main condenser off-gas monitors and main steam line radiation monitors are included in the scope of the steam generator system review. This is an example of extending the scope of the review to appropriately reflect key associated functions. 5

The waste gas system oxygen monitor which is part of the Gaseous Effluent Monitoring Instrumentation will be addressed as part of the supervisory review of the Gaseous Radwaste System.

- The system is in continuous operation such that the system functional operability is monitored on an ongoing basis. The redundant Spent Fuel Pool pump and cooler can be placed in service if problems are detected with the string that is in operation.

The principal safety function of the fuel handling area ventilation system is to mitigate a fuel handling accident. Since fuel will not be handled until the next refueling outage, a review of this system can be performed in the longer term, i.e., following restart.

Miscellaneous Containment Isolation

While the Safety Features Actuation System (SFAS) is included in the scope of the SRTP, the actuated valves do not constitute a single system, but rather are a part of other defined systems. As such, not all active valves identified in Table 3.6-2 of Technical Specification 3/4.6.3, Containment Isolation Valves, have been specifically included in the SRTP review. However, all active containment isolation valves will be demonstrated to be operable prior to restart through performance of the following Surveillance Tests (ST):

ST 5031.07	Integrated SFAS or 18 Month Test
ST 5031.18	Steam & Feedwater Rupture Control System Integrated Test
ST 5031.20	Main Steam Isolation Valves Response Time Test
ST 5062.02	Containment Spray Refueling Test
ST 5064.02	Atmospheric Vent Valve Operability Test

For those containment isolation valves not included in the scope of the 31 systems, a supervisory test review of these tests consistent with the review conducted on the isolation valves of the 31 systems will be performed. The results of this review will be submitted to the IPRC.

ECCS Room Sump Pumps

Although the ECCS room sump pumps are "Q" listed, they are not required to operate to mitigate any Design Basis Accident Sequence. Their primary service is to collect leakage that is potentially radioactive and direct it toward waste collection tanks. Sump pumps are sized for limited leakage from pump and valve packing, and for flange and tubing connector leaks. The pumps are not sized or designed for massive flooding; water tight curbing, compartments and doors provide major flood protection. Failures of sump pumps coupled with equipment leakage in sumps is detected by operators on normal rounds. Consequently ECCS equipment operability is not dependent on the operation of the sump pumps and they have not been included in the review program.

The presence of water or indications that water had previously been present in the ECCS rooms and in other plant locations was identified during the course of the STRP. Toledo Edison has conducted a review and evaluation to determine the extent of water, sources, and significance of water in six different plant locations. This review and evaluation included both ECCS pump rooms. The following results were identified:

- ECCS Room #1: No water was found. Stains indicate that there was ground water seepage, but that the seepage is no longer active.

- ECCS Room #2: There appears to be a minor groundwater leak into a floor drain. The maximum leakage appears to be less than a quart per day.

5

Based on these inspections and the normal rounds conducted by the operators, Toledo Edison anticipates no challenge to the normal operation of the ECCS room sump pumps.

Buildings and Structures

Toledo Edison has elected to focus the emphasis of the program on systems and components that perform active functions. The program therefore encompasses fluid, electric, and instrumentation systems where operability is of most significance and where assurance that the function can be performed is most relevant to the findings of the June 9 event. Passive structures have had little history of problems and the findings of the June 9 event did not indicate that the functional operability of structures was an immediate concern. Therefore safety related structures including Containment, Auxiliary Building, Intake Structure, Diesel Building, Service Water Tunnel, and Intake Canal Forebay Dikes, have been excluded from the program.