TOLEDO EDISON
A Centerior Energy Company

DONALD C. SHELTON
Vice President - Nuclear
(419) 249-2300

Docket No. 50-346

License No. NPF-3

Serial No. 1-785

February 29, 1988

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

Subject: Response to Inspection Report 87027

Gentlemen:

Toledo Edison has received Inspection Report 87027 (Log No. 1-1736, dated January 28, 1988) pertaining to a routine unannounced inspection by Mr. J. Ulie for the period October 19 through 23, 1987 and January 5, 1988 and provides the following response:

Violation

87027-07: Amendment No. 18 of Plant Operating License No. NPF-3 in Paragraph 2.C(4) requires the licensee to complete those modifications identified in Section 1 of the Safety Evaluation (SE) dated July 26, 1979 including those modifications specified in Table 1 of the SE. Section B of Table 1 required the licensee to complete these modifications by April 22, 1980.

Contrary to the above, the licensee failed to complete the modifications identified in Sections B.9, 10, 12, and 13 of Table 1 of the SE as follows:

a. The cable tray supports at column 9-F above elevation 603' 0" did not have the required fire proofing installed.

b. The required additional fire detectors had not been installed in the Demineralizer Room (Room 233) and Fuel Handling Area Room (Room 300).

c. An emergency lighting unit was not installed in the Room 241 passage.

IE01
1/0

d. The Kaowool around the conduits in the Service Water (SW) Valve Room and Component Cooling Water (CCW) Pump Room was found incomplete in that 37 of 63 circuits requiring fire wraps inspected were considered unsatisfactory due to missing Kaowool, damaged Kaowool or missing bands.

Response: 87027-07

Acceptance or Denial of the Alleged Violation

Toledo Edison accepts the alleged violation.

Reason for the violation

Regarding item a, on October 9, 1987 a review of correspondence pertaining to License Condition 2.C(4) determined that the required structural steel cable tray supports located at Column line F-9 and elevation 603'0" were missing. This deficiency was identified by Toledo Edison and documented in a Potential Condition Adverse to Quality.

Regarding items b,c and d on July 9, 1986, as a result of on-going design document reviews, discrepancies were identified between the requirements of License Condition 2.C(4), transmitted in License Amendment 18, dated July 26, 1979, and actual plant conditions in the areas of Kaowool wraps, emergency lighting, and fire detection.

The information regarding the above deficiencies was reported to the NRC in Special Report 86-030, dated August 18, 1986. The report was provided in accordance with Technical Specification 3.7.10.

Corrective Actions Taken and Results Achieved

a. A Suppression system is installed in the Turbine Building adjacent to the subject cable trays supports. Toledo Edison is currently reviewing the extent to which this system protects the cable tray supports. The results of this review will be submitted by March 15, 1988.

Toledo Edison will evaluate the necessary fire protection required for these cable trays supports and will implement the necessary resolution prior to power ascension following the sixth refueling outage. Toledo Edison has an hourly fire patrol in the fire area and this patrol will remain in place until the necessary resolution for these cable tray supports has been implemented.

A revision to Special Report 86-30 will be submitted by March 15, 1988 to discuss the lack of fire proofing on these cable trays.

b. Room 233, Demineralizer Room, is inaccessible except for shield plugs from the room above and is a High Radiation Area. This room contains a minimal fire loading (400 BTU/square foot), with all circuits routed in conduit. The TED Fire Protection Engineers review of the room concludes that no detection is necessary due to the unique nature of the room as discussed in Special Report 86-30.

Room 300, Fuel Handling Area, has local equipment detection but no area detection. A review of this area indicates a need for the area detection in accordance with the License condition. A hourly fire watch patrol has been provided for Room 300 and will remain in effect until modifications can be made to install area-wide detection.

c. A new emergency lighting unit in Passage 241 was installed in 1987. The power supply for the light is provided from a battery unit located in Room 227. A conduit extends from the battery pack to the lighting unit. The lighting unit is directed such that light shines towards the east end of Passage 241 along its entire length.

d. The Kaowool fire wrap deficiencies were identified in the Component Cooling Water Pump Room (Fire Area T) and the Service Water Valve Room (Fire Area II). Both Fire Areas contain fire detection and automatic suppression systems. Additionally, hourly fire patrols were in effect at the time the deficiencies were identified and will remain in place until they are corrected.

The Kaowool deficiencies noted in Inspection Report 87027 were reported to the NRC in Special Report 86-030. The deficiencies were identified during Preventive Maintenance Activity 1941. Preventive Maintenance Activity 1941 was performed to ascertain the adequacy of corrective actions resulting from Inspection Report 83-16. The degradations were of a minor nature and to some degree expected due to the fragile nature of Kaowool.

Periodic Test PT 5116.17, Fire Protection System Wrap Periodic Test, has been implemented to ensure that Kaowool wraps are maintained in an acceptable manner. Additionally, Administrative Procedure AD 1835, Plant Cleanliness Inspection Program, has been re-emphasized to personnel performing it. AD 1835 includes monthly checks on the overall Kaowool condition in the plant.

Due to the recurring problems Davis-Besse has encountered with Kaowool fire wrap, a more durable material will replace existing Kaowool wraps.

Date When Full Compliance Will be Achieved

a. Full compliance will be achieved upon the implementation of the necessary fire protection for the subject cable tray supports scheduled to be completed prior to power ascension following the sixth refueling outage.

b. Toledo Edison has determined that area wide detection is needed in Room 300. Installation of area wide detection in Room 300 will be completed prior to power ascension following the sixth refueling outage. Full compliance will be achieved for Room 233 upon deletion of this item in License Amendment 18 under the Generic Letter 86-10 process.

c. Full compliance was achieved when a new emergency lighting unit was installed in 1987.

d. As stated in the Toledo Edison response to Inspection Report 83-16 (Serial No. 1-678, dated November 7, 1986), Davis-Besse will be in compliance with 10CFR50, Appendix R, prior to power ascension following the sixth refueling outage, including replacement of kaowool.

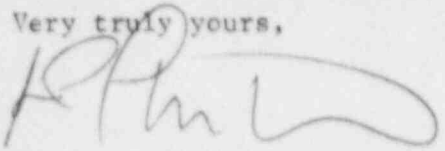
Open Item 8727-02: As a result of deficiencies identified during a fire brigade drill, the overall meeting of the standards described in Emergency Plan Drill Procedure No. EP-AD-0200 was determined to be unsatisfactory.

Response: 87027-02 Toledo Edison has reviewed the fire brigade drill and was not satisfied by its performance. However, the deficiencies identified in the inspection report would not have prevented the fire brigade from accomplishing its objective, namely, to safely extinguish a fire. The deficiencies identified by the inspector, and Davis-Besse's drill observers have been reviewed to improve future fire brigade performance. Future fire brigade drills will be closely monitored to assure a high level of performance.

Fire brigade complements have been reorganized to ensure adequate leadership experience in each fire brigade. The assured experience will provide each fire brigade with a level of brigade leadership more capable of directing brigade efforts. All fire brigades were drilled following the inspectors visit to determine their level of proficiency. The results of the additional drills demonstrated adequate fire brigade performance.

Toledo Edison feels the reorganization of fire brigade teams, with respect to experience levels will improve the ability of the fire brigade to perform its intended function. Additionally, a new fire brigade procedure will be approved by April 30, 1988. Training for all fire brigade members will be completed by June 30, 1988. A fire command course will be provided to fire brigade captains in two courses. The first course, which contains command training, will be completed by April 30, 1988. The second course, which contains general fire protection information will be completed by the end of 1988. Toledo Edison expects the command course to further improve fire captain leadership capabilities.

Very truly yours,



FHS:bam

cc: DB-1 Resident Inspector
A. B. Davis, Regional Administrator