



A Centenor Energy Company

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Docket Number 50-346

License Number NPF-3

Serial Number 1-885

June 26, 1989

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

Subject: Revised Response to Generic Letter 88-05, Boric Acid Corrosion of Carbon Steel Reactor Pressure Boundary Components in Pressurized Water Reactor (PWR) Plants (TAC Number 68915)

Gentlemen:

Pursuant to 10CFR50.54(f), Toledo Edison provided response to Generic Letter 88-05, Boric Acid Corrosion of Carbon Steel Reactor Pressure Boundary Components in PWR Plants on May 27, 1988, (Serial Number 1527). On page 2 of the attachment to the response, paragraph D stated the following:

- D. Control Rod Drive (CRD) Flanges - The CRD flanges are currently inspected for leakage each refueling outage as a corrective maintenance. Currently, gaskets are replaced on joints which have indication of leakage. This work is incorporated into the Preventative Maintenance (PM) Program as a refueling outage PM.

Toledo Edison has identified that the last sentence should read as follows:

This work is "to be" incorporated into the Preventive Maintenance (PM) Program as a refueling outage PM.

The work in paragraph D has not been incorporated into the PM Program at this time, however, the flanges have been inspected each refueling outage since April 1982. Toledo Edison is currently developing a PM Program that will be implemented by June 1989.

Subsequent to the Generic Letter response, Toledo Edison has determined that the process for identifying boric acid corrosion needs additional enhancements. This determination has been documented in Toledo Edison Potential Conditions Adverse to Quality Report (PCAQR) 89-0058, initiated on January 27, 1989. Toledo Edison has appointed a task force specifically chartered to improve the boric acid corrosion control process. The outcome of this task force is expected to combine all applicable aspects of the various

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programs described in Toledo Edison's May 27, 1988, response into a specific Boric Acid Corrosion Program. A draft procedure for implementation of the Boric Acid Corrosion Program has been developed. The overall program is planned to be implemented by September 1989. This program will satisfactorily implement the requirements of Generic Letter 88-05.

On June 1, 1989, Toledo Edison held a conference call with the Nuclear Regulatory Commission (NRC) to discuss the program enhancements described above. The Company identified that it would support an audit as scheduled on June 14 - 15, 1989, but felt that deferral of such an audit until completion of the programmatic enhancements was preferable. Subsequent to that call, the NRC notified Toledo Edison that the June audit would be deferred to September 1989 but due to contract and budget restraints further deferral would not be possible. Toledo Edison will support the September audit.

If you have any questions concerning this matter, please contact Mr. R. W. Schrauder, Nuclear Licensing Manager, at (419) 249-2366.

Very truly yours,



RTH/dlm

cc: P. M. Byron, DB-1 NRC Senior Resident Inspector
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