

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-346/79-17

Docket No. 50-346

License No. NPF-3

Licensee: Toledo Edison Company
Edison Plaza
300 Madison Avenue
Toledo, OH 43652

Facility Name: Davis-Besse Nuclear Power Plant, Unit 1

Investigation At: Bethesda, Maryland and Oak Harbor, Ohio

Investigation Conducted: June 29 and 30, 1979

Investigator:

G. A. Phillip

8-6-79
(Date)

Reviewed By:

C. E. Norelius
C. E. Norelius, Assistant to
the Director

8/7/79
(Date)

R. F. Warnick
R. F. Warnick, Chief
Reactor Projects Section 2

8-8-79
(Date)

Investigation Summary

Investigation on January 29 and 30, 1979 (Report No. 50-346/79-17)

Areas Investigated: Because NRR expressed concern that the licensee had failed to bring to the staff's attention a reportable event which may have affected the staff's evaluation of the licensee's compliance with the Commission's May 16, 1979 confirmatory order, reviewed pertinent records and procedures and interviewed personnel. The investigation involved 12 investigation-hours by one NRC investigator.

Results: The investigation revealed no indication that the licensee had made any effort to withhold information from the NRC staff. No items of noncompliance were identified.

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REASON FOR INVESTIGATION

On June 28, 1979, Region III became aware that the Office of Nuclear Reactor Regulation (NRR) had become concerned that the licensee may have withheld pertinent information from staff members who were evaluating the licensee's compliance with the Commission's confirmatory order of May 16, 1979 and initiated an investigation of the matter.

SUMMARY OF FACTS

On June 28, 1979, Region III became aware of NRR's concern that information regarding a May 21, 1979 reportable occurrence relating to the failure of auxiliary feedwater (AFW) pressure switches contained in Licensee Event Report (LER) No. 79-062, transmitted to the NRC on June 15, 1979 had not been made available earlier to NRR staff members evaluating compliance with the Commission's confirmatory order of May 16, 1979. The staff had finalized a safety evaluation report on June 27, 1979. Specifically, LER 79-062 was not included in the licensee's May 23, 1979 submittal concerning the overall reliability of the AFW system and was not brought to the staff's attention during a June 8, 1979 site visit or during almost daily contacts during the period May 21-June 27, 1979.

Region III conducted an investigation of this matter on June 29 and 30, 1979. The investigation determined that licensee personnel who prepared the May 23 submittal were unaware of LER 79-062 prior to that date and that licensee management personnel who attended the June 8 site meeting were at that time unaware of LER 79-062. It was further determined that the licensee's position is that LER 79-062 involved a component failure and was not a system failure as defined in the May 23 submittal. Even after they were aware of LER 79-062 they did not bring it directly to the staff's attention since they did not consider it as altering their position regarding AFW system reliability.

The investigation revealed no indication that the licensee had made any effort to withhold information from the staff.

It was also ascertained that Region III inspection personnel who had been at the Davis-Besse site during the period May 21-June 27, 1979 were not aware of LER 79-062 prior to the licensee's issuance of it on June 15, 1979.

DETAILS

1. Personnel Contacted

Toledo Edison Company

Lowell E. Roe, Vice President, Facilities Development
Eugene C. Novak, General Superintendent, Power Engineering and Construction
Fred Miller, Plant Nuclear Systems Engineer
Ted J. Myers, Nuclear Licensing Engineer
Terry D. Murray, Station Superintendent
Steve Quennoz, Technical Engineer
Dean Hitchens, Lead Instrument and Control Engineer

Office of Nuclear Reactor Regulation

D. F. Ross, Deputy Director, Division of Project Management
R. A. Capra, Light Water Reactor Branch No. 3
G. R. Mazetis, Division of System Safety
F. D. Thatcher, Division of System Safety

Region III Office of Inspection and Enforcement

K. R. Baker	L. A. Reyes
F. T. Daniels	M. D. Riden
R. J. Greer	J. F. Streeter
A. G. Januska	T. M. Tambling
J. F. Menning	I. T. Yin

2. Background Information

On March 30, 1979, Davis-Besse Unit 1 began a planned maintenance outage which was originally planned to last about one week. In view of the series of events at the Three Mile Island facility which began March 28, 1979, Toledo Edison (TECo) decided to extend the outage to perform reviews to obtain assurance that an event similar to that experienced at Three Mile Island would not occur at Davis-Besse.

Because of Three Mile Island, the NRC issued Bulletins 79-05, 79-05A and 79-05B on April 1, 5 and 21, 1979, respectively. These bulletins required several actions by all operating B&W designed power reactors one of which was Davis-Besse, Unit 1. After a series of discussions between the NRC staff and the licensees concerning possible design modifications and changes in operating procedures, TECo agreed in letters dated April 17 and May 4, 1979 to implement several actions prior to startup from the maintenance outage. On May 16, 1979 the Commission issued a Confirmatory Order regarding the TECo commitment.

NRR created a Bulletin and Order Task Force to evaluate the licensee's compliance with the order and to prepare a Safety Evaluation Report (SER) as a basis for the lifting of the order by the Commission. The SER was finalized on June 27, 1979 and on June 29, NRR and I&E personnel were scheduled to meet with the Commission to provide the information required by the Commission in making a decision to lift the order. On June 27, 1979, the Bulletin and Order Task Force became aware of LER 79-062. NRR and I&E mutually agreed to postpone the meeting with the Commissioners since there was a possibility the LER would affect the SER and a question arose concerning the failure of the licensee to inform the task force of the LER.

3. Introduction

On June 28, 1979, Region III was informed that NRR staff members who comprised the Bulletin and Order Task Force had raised concerns that the licensee had not brought pertinent information to their attention. On June 27, 1979 the Bulletin and Order Task Force had finalized the SER regarding the licensee's compliance with the Commission's Confirmatory Order on May 16, 1979. On the same day, June 27, 1979 the task force became aware by chance of the information contained in LER 79-062, which reported the failure of AFW suction pressure switches during a test conducted on May 21, 1979. This LER was transmitted routinely to the Commission by letter dated June 15, 1979.

The Task Force regarded the substance of LER 79-062 as possibly making a statement in the SER invalid. The SER contained a reference to there being only three LER's, i.e., three failures of the AFW system since January 1978. This statement was based upon statements by the licensee in Enclosure 1 of a May 23, 1979 submittal concerning the reliability of the AFW system.

It was indicated that the licensee had not made the Task Force personnel aware of LER 79-062 although they had been in almost daily contact with the licensee since May 21, 1979 and some Task Force personnel had visited the Davis-Besse site on June 8, 1979. It was indicated that although it was understandable that the May 23 submittal had been sent initially without any mention of LER 79-062, no apparent effort had been made by the licensee subsequently to modify its contents.

4. Interviews with NRR Personnel on June 29, 1979

During a visit to the NRR offices on June 29, 1979, three members of the Bulletin and Order Task Force; D. F. Ross, R. A. Capra and G. R. Mazetis, were interviewed.

The Task Force members confirmed that since the issuance of the Confirmatory Order on May 16, 1979, there had been almost daily

telephone contacts between task force members and the licensee. In addition, licensee personnel had visited the NRR offices and the above-mentioned Task Force personnel had visited the Davis-Besse facility on June 8, 1979. No information about LER 79-062 had been provided by the licensee during these contacts.

It was indicated that the site visit on June 8, 1979 had consisted of a tour of the plant in the morning to see various modifications that had been made to the AFW system and an afternoon meeting to discuss the details of the order and to clear up any loose ends. It was indicated that during these discussions the licensee had emphasized the high reliability of the AFW system and had cited the fact that there had been only three failures since January 1978 as evidence of its reliability.

It was also indicated that the content of the licensee's May 23, 1979, submittal, which referred to each of the LER's relating to the three AFW system failures, had been discussed. None of these discussions elicited any mention of the May 21 test failure reported in LER 79-062.

Although one Task Force member was under the impression that a first draft of the staff's SER had been written and a copy possibly provided to the licensee at the June 8, 1979 meeting, another Task Force member advised that he had a handwritten draft of the SER with him at the meeting but did not use it and no copies were furnished to the licensee.

The Director of the Task Force advised that a meeting was being held that day, June 29, with the licensee to discuss the technical details of LER 79-062. Prior to this meeting he indicated that the test which resulted in the failure of the suction pressure switches was the first time this test was required. The technical specifications require the test to be performed once every 18 months. He indicated that at the present time there was only one data point regarding the reliability of these switches, and this was a failure. The significance of the failure would be determined when more information was obtained during the meeting to be held that day. He indicated that some changes to the technical specification requirements would probably result from the meeting.

He indicated that a letter dated June 29, 1979 expressing NRR's concern about the failure of the licensee to bring LER 79-062 directly to the attention of the Task Force was being transmitted to the licensee. A copy of the letter was obtained and is attached to this report as Exhibit A.

On June 29, 1979, F. D. Thatcher, Instrumentation and Control, Division of System Safety was contacted by telephone. He advised that LER 79-062 had been shown to him by another member of his group

as a matter that might be of general interest to him. He did not evaluate its significance because he was not familiar with the Davis-Besse systems. It occurred to him, however, that the Task Force should be aware of it. Since he did not know whether they were aware of it, he brought it to their attention on June 27, 1979.

5. Interview with Lowell E. Roe, Vice President, TECo

On June 29, 1979, Lowell E. Roe, Vice President, Facilities Development, TECo was interviewed at Bethesda, Maryland.

Roe stated that the normal procedure was followed by the licensee in issuing LER 79-062. He said there had been no effort or intent to withhold information from the Commission or more specifically from the B&O Task Force. He pointed out that the LER was transmitted some six days earlier than required and this would not have been done if there had been any desire to withhold information from the Commission.

He said the reportable matter was first documented by the preparation of a deviation report regarding the failure of the switches during a test by the individual conducting the test. He said copies of some deviation reports are routed to him but he was unsure as to whether he gets all of them. He indicated he usually glances at those he receives and then discards them. He does not recall having seen this particular LER but, if he did, it had no impact on him.

Roe said he recalled seeing a draft of the LER on about June 11, 1979. He made a comment via telephone to the engineer who had prepared it to the effect that it should contain more information. He eventually receives a copy of LER's in their final form. He said he was not aware of the LER at the time he met with the Task Force personnel at the site on June 8.

Regarding the June 8 meeting, he said there was no formal agenda nor were any formal notes kept concerning the topics discussed during the meeting. It was his recollection, however, that there was little or no discussion of LER's. He recalled however, that TECo personnel had stressed the reliability of the AFW system during a discussion of the possible need for the use of a startup feedwater pump.

Regarding the May 23, 1979 submittal, Roe said that the technical content was prepared by personnel in the corporate office and he reviewed it in final form before signing the transmittal letter. At that time he was unaware of LER 79-062. He indicated he has become familiar with the content of that LER in the last few days and it is the licensee's position that it would not have altered the May 23 submittal. He said the switch failures were component failures rather than system failures as defined in the May 23 submittal. For

this reason he did not feel it would be necessary to modify the May 23 submittal in the light of the LER. Roe went on to say that in preparing the May 23 submittal all LER's pertaining in any way to the AFW system had been reviewed. Several of them were not included since they had no impact on the reliability of the system to deliver water to a steam generator.

He indicated that while he is concerned about any problems relating to the AFW system he did not regard the switch failures as a significant concern. He said that if this particular test had not been performed, other tests, which must be conducted before the unit is returned to operation, would have shown that the system was not functioning properly and through an ensuing investigation the switch failures would have been detected.

Roe said that he felt TECo has always been open in its dealings with the NRC. He indicated that the June 29, 1979 letter from NRR expressing concern about this matter had been hand delivered to him and that TECo would respond to it in writing the same day. A copy of a letter dated June 29, 1979 from Roe to the NRC was subsequently obtained and is attached to this report as Exhibit B.

6. Interview with Eugene C. Novak, General Superintendent, Power Engineering and Construction, TECo

On June 29, Eugene Novak, General Superintendent, Power Engineering and Construction, TECo was interviewed at Bethesda, Maryland. Novak stated that the May 23, 1979 submittal was prepared by personnel in his organization and that when he reviewed it prior to its transmittal he was unaware of LER 79-062. He said he did not become aware of the LER until June 9, the day following the meeting he attended with Task Force personnel at the site. He said that when he saw the first draft of the LER he considered the contents inadequate and spoke by telephone to the Plant Superintendent about it. He said that although he would normally route draft LER's to other personnel in his organization for their review and comment, he did not do so in this instance. Instead he made some comments on his copy and returned it to the author for further work.

Novak said a second draft of the LER was telecopied to him on June 14 and he assigned it to C. Domeck, Nuclear Project Engineer and F. Miller, Plant Nuclear Systems Engineer for review. The results of their review were telephoned to the site and the LER was issued June 15, 1979.

Novak said that after he became aware of the LER he did not regard it as being a matter which would modify the statements in the May 23 submittal regarding the reliability of the AFW system. He said he considered the LER from that standpoint and concluded this was a component failure and did not meet the reliability criteria set

forth in that submittal. He went on to say that he did not regard the LER as a matter of significance that should be specifically brought to the Task Force's attention.

7. Interview with Ted J. Myers, Nuclear Licensing Engineer, TECo

On June 29, 1979, Ted J. Myers, Nuclear Licensing Engineer, TECo was interviewed at Bethesda, Maryland. Myers stated that he attended an NRR meeting with representatives of all B&W reactor licensees held soon after the events at Three Mile Island. During that meeting NRR emphasized the failure rate of steam driven AFW pumps. During a subsequent meeting between TECo and NRR staff members on May 8, 1979, the licensee offered to demonstrate the reliability of the Davis-Besse AFW system in response to the NRR staff's view that special electric pumps be added to the AFW system. The licensee's view was that these pumps were not needed and their installation would involve other complications they would prefer to avoid. The agreement to submit information regarding AFW system reliability, along with several other items, was confirmed in a letter dated May 18, 1979 from NRR to TECo.

Myers stated that personnel in Power Engineering in the TECo corporate office prepared the May 23 submittal regarding AFW system reliability. In this connection all LER's relating to the AFW system were reviewed. Several LER's were eliminated as not meeting the definition of a failure and therefore were not included in determining the failure rate stated in the May 23 submittal. He indicated these LER's involved subsystem failures but no system failure on demand.

Myers stated that he did not recall ever seeing LER 79-062 in draft form or in final form prior to June 27. If he had seen it, he had no reaction to it. He would not have and did not now regard this LER as affecting the content of the May 23 submittal. He said he first became aware of the switch failures reported in LER 79-062 on June 27 when he received a call from NRR concerning it. He said that even if he had been aware of it, he doubts that he would have mentioned it to the NRR Task Force personnel with whom he had frequent contacts.

8. Interview with Terry D. Murray, Station Superintendent, TECo

On June 29, 1979, Terry D. Murray, Station Superintendent at the Davis-Besse site was interviewed at Bethesda, Maryland. Murray stated that copies of all deviation reports are distributed to him but he did not recall seeing the one prepared on May 21 regarding the failure of the pressure switches tested on that date. He said he did not recall anyone discussing the matter with him or reporting it orally to him. He indicated that during normal operations such things would probably be brought to his attention but this was an unusually busy time. During this outage several plant and procedure

modifications were being made as a result of the event at Three Mile Island. If he had been made aware of it, it did not make any particular impression on him. He indicated that he reviews deviation reports from the standpoint of their impact on plant operations. Since the plant was shutdown, the failure of these switches would not be regarded by him as being operationally significant.

Murray indicated that it was his recollection that he had not seen the first draft of LER 79-062 until June 9, the day after the Task Force members visited the site on June 8. If he had been aware of the switch failures at that time he probably would not have mentioned it to the Task Force since he did not consider it as affecting the AFW system reliability. Murray confirmed that Power Engineering receives copies of draft LER's for review and comment. Through contacts with Power Engineering after the first draft of LER 79-062 was distributed he was aware they were familiar with its content.

Murray indicated he was aware that Power Engineering was engaged in a system reliability study and that he had provided them with some information they requested by telephone. Through these contacts he was familiar with the approach being taken in which LER's were discussed in the study. He said he did not recall seeing the May 23 submittal and was uncertain whether a copy was sent to him. During a subsequent conversation with Murray at the Davis-Besse site on June 30, he confirmed that a copy had been sent to the site and it had been routed to various site personnel.

Murray observed that Power Engineering personnel were the primary contacts with NRR and he would expect them to inform NRR of any significant information.

9. Interview with Steve Quennoz, Technical Engineer, Davis-Besse

On June 30, 1979, Steve Quennoz, Technical Engineer, at Davis-Besse was interviewed at the Davis-Besse plant.

Quennoz stated that in accordance with plant procedures, deviation report No. 79-077 which reported the failure of pressure switches during a test on May 21, 1979 was brought to him for evaluation. He determined that the matter did not require immediate reporting to the NRC but that an LER must be submitted in thirty days. He entered that information on the report form and assigned Instrument and Control as the responsible section to investigate the matter, to determine the corrective action and to prepare the JER.

Quennoz advised that there was a high volume of maintenance work going on at that time. There were also plant modifications being made as well as extensive procedural changes. Plant personnel were working long hours to complete these tasks. He said that under normal conditions he probably would have discussed the switch failures

with Murray or at least have brought them to his attention during a staff meeting. Under the existing circumstances however, with so much going on he and other supervisory people avoided bothering the Plant Superintendent with items that did not appear to be particularly significant.

Quennoz said he was familiar with NRC Bulletins 79-05, A and B and in response to them worked extensively on procedural changes. He said beginning about the first of June he spent two weeks in Bethesda with NRR personnel working on these procedures. He indicated it did not occur to him to mention the switch failures to the NRR personnel with whom he was working. Since he was in Bethesda he did not attend the June 8 meeting at the site with NRR personnel. He said he was unaware that Power Engineering was doing a AFW system reliability study. He indicated he had recently seen the May 23 submittal to NRR and it was his opinion LER 79-062 does not require any changes in its content.

Regarding the processing of the LER, he said he recalled that the first draft was inadequate and a second draft was prepared by Instrument and Control. He advised that in addition to being reviewed by various groups, including some in the corporate office, all LER's must be reviewed and approved by the Station Review Board (SRB) before they are transmitted to the NRC. The second draft of LER 79-062 was telecopied to Power Engineering on June 14 for completion of their review by June 15. After a mistake was detected by Power Engineering and corrected, the SRB reviewed and approved the LER on June 15, 1979.

10. Telephone Conversation with Fred Miller, Plant Nuclear Systems Engineer, TECo

On June 30, 1979, Fred Miller, Plant Nuclear Systems Engineer, Power Engineering and Construction, TECo was contacted at his residence by telephone. Miller stated that he first saw LER 79-062 on June 15. He indicated it had been telecopied to Power Engineering from the site. He found an error or two in it and informed the plant of them by telephone. After the errors were corrected, the LER was dispatched to the NRC later that day.

Miller confirmed the information previously obtained concerning the May 23 submittal. He indicated that even if he had information regarding the switch failures when he was working on that submittal, he would not have included it. He indicated he had so informed a Task Force member during a recent telephone conversation with him.

11. Interview with Dean C. Hitchens, Lead Instrument and Control Engineer, Davis-Besse

On June 30, 1979, Dean C. Hitchens, Lead Instrument and Control Engineer at the Davis-Besse site was interviewed at the site. Hitchens stated

that the deviation report regarding the switch failures was assigned to his group for handling. He said he was not involved in it initially, however, because he was on vacation. After he returned on June 5 he assumed responsibility for it. The first draft was not sufficiently detailed and he received several critical comments from those to whom it had been routed for review. He said he rewrote it and telecopied the revised version to Power Engineering. After an error they found in it was corrected, the SRB approved it, and it was sent to the NRC on June 15. He said that although he was aware that the AFW was receiving a lot of attention he was unaware of the May 23 submittal at the time he was working on the LER. He advised that the switch failures were handled as a component failure which required a 30-day report. He stated he did not attend the June 8 meeting with NRR personnel.

12. Record Review

During the June 30 site visit, the file pertaining to LER 79-062 was reviewed and no inconsistencies were noted. The SRB record of the June 15 meeting, in which the LER was approved, was also reviewed. Station procedures regarding the handling of deviation reports were also reviewed.

13. Management Discussion

At the conclusion of the site visit on June 30, the Plant Superintendent was advised that the investigation had revealed no evidence or no indication that the licensee had made any effort to withhold any information from the staff.

14. Interviews With Region III Inspectors

Subsequent to the investigation, all Region III inspectors who had visited the Davis-Besse site during the period May 21-June 27, 1979 were interviewed to determine when the NRC first became aware of LER 79-062. It was determined through these interviews that none of the inspectors were aware of the switch failures prior to the issuance of the LER on June 15, 1979.

Attachments:

Exhibit A - 6/29/79 ltr NRR to TECO

Exhibit B - 6/29/79 ltr TECO to NRR

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Cocket No. 50-346

JUN 29 1979

POOR ORIGINAL

Mr. Lowell E. Roe
Vice President, Facilities
Development
Toledo Edison Company
Edison Plaza
300 Madison Avenue
Toledo, Ohio 43652

Dear Mr. Roe:

This letter is to express our concern over the failure of Toledo Edison Company (TECO) to bring to the attention of the NRC Staff members evaluating the Company's compliance with the Commission's confirmatory order of May 16, 1979, Reportable Occurrence (RO) 79-062 at Davis-Besse 1. We have several questions, set forth below, relating to TECO management's awareness of this event, and the reason for failure to discuss this event in communications with the NRC Staff documenting the actions taken in response to the May 16 Order.

By letter of April 27, 1979, TECO committed, among other things, to "continue to review all aspects of [the auxiliary feedwater] system to further upgrade components for added reliability and performance." The commitment was confirmed and required by paragraph IV(1)(a) of the Commission's May 16, Order.

On May 21, 1979 Reportable Occurrence 79-062, involving inoperable auxiliary feedwater (AFW) suction pressure switches and out-of-tolerance pressure setpoints, occurred. This was reported to NRC's Region III, Office of Inspection and Enforcement by letter (LER 79-062) of June 15, 1979. Despite, however, numerous meetings and exchanges of correspondence between TECO and NRC concerning the reliability of the AFW system, the event was not brought to the attention of the members of the Staff's Bulletins and Orders Task Force evaluating compliance with the May 16, Order. To the contrary, by letter of May 23, 1979 from L. Roe (TECO) to R. Reid (NRC) identified only three LER's since January 1978 involving the AFW system; no mention was made of the May 21, 1979 event.

Similarly Messrs. D. Ross, G. Mazetis, and R. Capra of NRC visited Davis-Besse 1 and talked with L. Roe, T. Murray (The Station Superintendent) and other TECO personnel on June 8, 1979. The subject of AFW LER's was on the meeting agenda and the NRC Staff was again informed that there had been only 3 LER's since January 1978. Again, no mention was made of the May 21 event.

Mr. Lowell E. Roe

POOR ORIGINAL

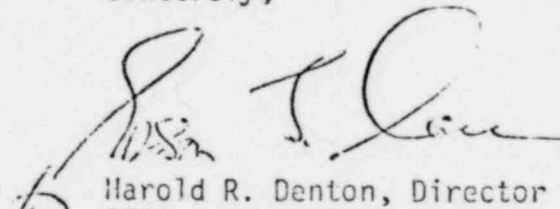
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JUN 27 1979

A Staff Safety Evaluation (SE) containing the evaluation of TECO's compliance with the Commission's May 16 Order was finalized on June 27 and provided to you on that date. On page 6 of that SE we discuss "the 3 failures of AFW system components from January 1978 to date" of which NRR had knowledge. Additional evaluation, and supplementation of the SE will be required in light of LER 79-062. In addition to the required technical evaluation from TECO needed to comply with the terms of the Order, we will require answers to the following questions concerning TECO's policies and practices with respect to informing TECO management and NRC about potentially unsafe conditions:

1. At the time of the May 23 submittal stating that only 3 AFW failures had occurred since January 1978, was Mr. Roe aware of RO 79-062? If not, explain why not, and when was he made aware of it. If the answer is yes, explain why the event was not discussed in the May 23 letter. Also explain why TECO did not supplement the May 23 letter to discuss the May 21 event or raise the matter in the numerous discussions with NRC concerning AFW reliability.
2. Explain why the May 21 event was not brought up at the June 8, 1979 discussions between NRC and TECO personnel on AFW LERs. We have been informed that at the June 8 meeting the Station Superintendent, Terry Murray, was unaware of RO 79-062. Is this correct? If the answer is yes, explain the TECO policy about timeliness of reporting potentially unsafe conditions to DB-1 and TECO management. Also, discuss who within TECO management was informed of RO 79-062 and when and how were they so informed.

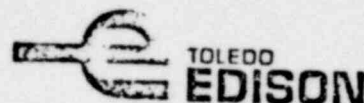
Sincerely,


Harold R. Denton, Director
Office of Nuclear Reactor
Regulation

998 057
Exhibit A

Page 2 of 2

Docket No. 50-346
License No. NPF-3



June 29, 1979

LOWELL E. ROE

Vice President
Facilities Development
(419) 259-5242

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

Dear Mr. Denton:

Your letter of June 29, 1979 requested certain information concerning Toledo Edison policies and practices with respect to informing TECo management and the NRC about Davis-Besse Nuclear Power Station Unit 1 operations. Specifically, the letter raises certain questions concerning Toledo Edison handling of Reportable Occurrence 79-062. This involved a discovery on May 21, 1979 of inoperable auxiliary feedwater suction pressure switches and out-of-tolerance pressure setpoints.

The answers to your specific questions are as follows:

1. I was not aware, at the time of the May 23 submittal, of the existence of Reportable Occurrence 79-062.

As clearly stated in the data included in the May 23 submittal, the reliability analysis related to the ability of an auxiliary feedwater pump to deliver water to a steam generator. Reportable Occurrence 79-062 was a component failure that would not have impaired the ability of an auxiliary feedwater pump to deliver water to its steam generator and therefore would not have been included in our analysis no matter when this condition might have been discovered.

It must also be kept in mind that at the time of the calibration check which led to RO 79-062, the status of the station (Mode 5) did not require that the auxiliary feedwater system be operable. Prior to entering an operating mode that would have required the auxiliary feedwater system to be operable, a functional test to prove operability is required.

2. At the time of the June 8 discussion between NRC and TECo personnel at the Davis-Besse Station when the NRC review team inspected and reviewed a number of aspects relating to the Commission's Order of May 16, 1979 and our responses relating to this Order, the Station Superintendent, myself and others at the meeting were not aware of Reportable Occurrence 79-062. In accordance with the normal station procedures as found in AD1807.00 "Control of Conditions Adverse to Quality", the circumstances leading to RO 79-062 were properly documented and evaluated to be a 30 day reportable event. For such a reportable event, there is no requirement or need for the Station Superintendent to have been aware of it on this time frame.

Pressure switch calibration checks were performed on May 21, 1979 by instrument and control mechanics to satisfy the surveillance requirements. The discovery of the deficiencies led to a Deviation Report (DVR) being initiated in accordance with Station Procedure AD1807.00. This DVR was evaluated by the appropriate level station management personnel. The Station Performance Engineer and the Nuclear and Performance Engineer jointly evaluated this event as a 30 day reportable occurrence on May 22.

In accordance with station procedure AD1804.00 "Reports Management Procedure", an engineer in the Instrument and Control group of the Maintenance Section was assigned the responsibility to develop the draft License Event Report (LER). This LER 79-062 was developed and was transmitted to the following persons by Inter Office Memorandum dated June 7 for review and comment:

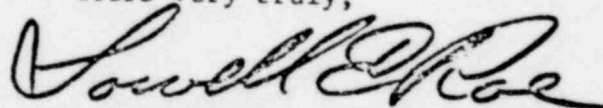
Vice President, Energy Supply
Vice President, Facilities Development (Chairman CNRB)
General Superintendent Power Engineering and Construction
Quality Assurance Director
Assistant Vice President, Public Relations
Davis-Besse Station Superintendent
Chairman Station Review Board (SRB)

Following receipt and incorporation of comments and additional information, a final revised draft was reviewed and approved by the Station Review Board on June 15, 1979.

The formal transmittal of LER 79-062 to NRC Region III Director was made on June 15 with copies to the above named persons and to extensive additional distribution including the Company President.

In summary we have developed and are following established procedures to detect, evaluate and report any condition that is adverse to quality. We feel these procedures were properly followed and that proper evaluation and disposition was made of Reportable Occurrence 79-062.

Yours very truly,



Lowell E. Roe
Vice President
Facilities Development

LER/bs

cc: Edson G. Case, Deputy Director, Office of Nuclear Reactor Regulation