

Docket No. 50-346 License No. NPF-3 Serial No. 579 January 22, 1980

RICHARD P. CROUSE Vice President Nuclear (419) 259-5221

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

Dear Mr. Denton:

Toledo Edison has indicated its intention to implement all "Category A" recommendations identified in your letter of September 13, 1979, which was later clarified on October 30, 1979 concerning NUREG 0578, "TMI-2 Lessons Learned Task Force Status Report and Short-term Recommendations." The schedule for completion of these tasks for the Davis-Besse Nuclear Power Station Unit 1 was submitted by our letter of October 23, 1979 (Serial No. 546) and later revised on November 21 and December 31, 1979 (Serial Nos. 559 and 570). These schedules reflect compliance with all "Category A" recommendations by January 31, 1980 with the exception of two that are equipment related delays. These include the primary coolant saturation indication system as well as the primary system safety and pilot operated relief valve position indication system.

The attachments to this letter provide appropriate justification to allow the continued operation of the Davis-Besse Nuclear Power Station Unit 1 beyond January 31, 1980. Toledo Edison commits to install the delayed equipment within 30 days of each system delivery as identified in the attachments. If installation is not accomplished within the allocated 30 days, Davis-Besse Nuclear Power Station Unit 1 shall be placed in a cold shutdown or refueling mode of operation until such installations are completed.

Toledo Edison reiterates its firm belief that the design of the Davis-Besse facility, complimented by recent modifications and procedural

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changes, support continued operations without any adverse impact on the health and safety of the public. This response is considered to acceptably justify continued operation, as limited above, beyond January 31, 1980. We are available to discuss any questions you may have.

Yours very truly,

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cc: Mr. Robert N. Reid, Chief Operating Reactors Branch No. 4 Division of Operating Reactors United States Nuclear Regulatory Commission Washington, D. C. 20555 Docket No. 50-346 License No. NPF-3 Serial No. 579 January 22, 1980 Attachment A

Primary System Safety and Pilot Operated

Relief Valve Position (PORV) Indication System

Note: The schedular information is current as of January 22, 1980.

System

The valve position indication is an acoustic monitoring type being provided by Technology for Energy Corporation (TEC). Cabinets for equipment mounting are being provided by Vitro Laboratories Division of Automation Industries, Inc.. Detailed installation hardware and cabling is being identified by Bechtel Power Corporation and procured by Toledo Edison Company.

Procurement

Toledo Edison orally requested TEC to supply this indication in October, 1979. A formal purchase order was issued on December 17, 1979 (TECo Purchase Order No. Q46686) confirming this request.

A search for fabricated, seismically qualified equipment cabinets resulted in an oral commitment on January 2, 1980 to purchase cabinets from Automation Industries, Inc. (AI). Formal transactions have not been finalized because AI is a new vendor for Toledo Edison and is in the process of being verified by us to have an acceptable quality assurance program. This is required on all suppliers of safety grade equipment. This verification is not expected to be unacceptable or delay cabinet delivery.

Detailed installation hardware and cabling is now being identified. Barring unforeseen difficulties in procurement this is not expected to delay system installation.

Expected System Delivery

Valve Position Indicator (TEC) January 25, 1980

Cabinets (AI)

February 22, 1980

Hardware and Cabling (Bechtel and Toledo Edison) Not finalized

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Installation

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A Toledo Edison Instrumentation and Controls Section Senior Engineer is currently participating in TEC's factory testing of the indication. Barring unforeseen procurement difficulties, installation of the valve position indication system will be within 30 days of cabinet delivery. This installation will require work inside the containment vessel and therefore a plant outage is required. To minimize hardware procurement and installation time, temporary cable routing may be used inside the containment vessel until the Spring refueling outage.

In the interim, DB-1 emergency procedures currently utilize quench tank level, quench tank pressure and PORV electrical position indication to aid in operator diagnostics of valve operations.

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Primary Coolant Saturation

Indication System (NUREG 0578, Section 2.1.3b)

Note: The schedular information is current as of January 22, 1980.

System

The primary coolant saturation indicator is being provided by Babcock and Wilcox (B&W). Cabinets for equipment mounting are being provided by Vitro Laboratories Division of Automation Industries, Inc. Detailed equipment interfaces are being provided by Bailey Meter Company as a field change package to B&W. The planned installation at Davis-Besse includes seismically qualified cabinets and utilization of all safety grade parametric inputs.

Procurement

Toledo Edison orally requested B&W to supply the saturation indicator on November 12, 1979. The contractual agreements are not yet formalized and are under revision to incorporate the total field change installation package being provided through B&W by Bailey Meter Company.

A search for fabricated, seismically qualified equipment cabinets resulted in an oral commitment to purchase cabinets from Automation Industries, Inc. (AI) on January 2, 1980. Formal transactions have not been finalized because AI is a new vendor for Toledo Edison and is in the process of being verified by us to have an acceptable quality assurance program. This is required on all suppliers of safety related equipment. This verification is not expected to be unacceptable or delay cabinet delivery.

Expected System Delivery

Cabinets (AI)	16 - S S.	February 22, 1980
Indicator (B&W)		March 1980
Field Charge Package (B	ailey) -	Week of May 26, 1980

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Installation

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This current schedule identifies installation of the primary coolant saturation indication system during the spring refueling outage. In the interim DB-1 currently provides operator saturation curves mounted in the control room as well as in the station emergency procedures. The station operators have been trained in the utilization of these curves with indicated primary system temperature and pressure.

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SUBMITTAL IN RESPONSE TO THE SHOW CAUSE ORDER OF JANUARY 2, 1980 FOR THE DAVIS-BESSE NUCLEAR POWER STATION UNIT 1 FACILITY OPERATING LICENSE NPF-3

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This response is filed in accordance with Section V of the subject Order dated January 2, 1980. This letter provides information relating to the implementation of short term lessons learned recommendations at the Davis-Besse Nuclear Power Station, Unit 1.

> s/ Richard P. Crouse Vice President, Nuclear

Sworn to and subscribed before me the twenty-second day of January, 1980.

s/ Linda L. Costell

Notary Public

LINDA L. COSTELL Notary Public — State of Obio My Commission Expires Feb. 9, 1992

SUBMITTAL IN RESPONSE TO THE SHOW CAUSE ORDER OF JANUARY 2, 1980 FOR THE DAVIS-BESSE NUCLEAR POWER STATION UNIT 1 FACILITY OPERATING LICENSE NPF-3

This response is filed in accordance with Section V of the subject Order dated January 2, 1980. This letter provides information relating to the implementation of short term lessons learned recommendations at the Davis-Besse Nuclear Power Station, Unit 1.

Vice President, Nuclear

Sworn to and subscribed before me the twenty-second day of January, 1980.

Notary Public

LINDA L. COSTELL Notary Public -- State of Onio My Commission Expires Feb. 9, 1982