

November 19, 1979

Docket No. 50-346

License No. NPF-3

Serial No. 1-105



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

Mr. R. F. Heishman, Chief
Reactor Operations and Nuclear
Support Branch
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Heishman:

Toledo Edison acknowledges receipt of your October 20, 1979 letter and enclosures, Appendix A and Report 79-28, referencing an apparent deviation from Davis-Besse Nuclear Power Station Unit 1 commitments to the NRC listed as an "Infraction" in Appendix A.

Following an examination of the item of concern, Toledo Edison herein offers information regarding the item of non-compliance.

Infraction: Technical Specification 6.5.1.6.e requires the Station Review Board to investigate all violations of Technical Specifications including preparation and forwarding reports covering evaluation and recommendations to prevent recurrence to the Vice President - Energy Supply and to the Chairman of the Company Nuclear Review Board.

Contrary to the above, the Station Review Board did not investigate the violations of Technical Specification and prepare a report for the items contained in IE Inspection Report No. 50-346/79-04 dated March 28, 1979.

- Response:
1. The violation of Technical Specification 6.8.1 addressed in NRC Inspection Report 79-04 was not documented nor reviewed by the Station Review Board. A Deviation Report has been prepared to provide the established investigation and review of this event.
 2. Per Station Administrative Procedure AD 1807.00 "Control of Conditions Adverse to Quality" the Technical Engineer has the responsibility to assure that a Deviation Report is initiated for non-periodic reportable events within this context, he has

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been instructed to review NRC Inspection Reports upon receipt to insure all reported items of non-compliance are assigned a Deviation Report, if such a report has not already been prepared. This will allow a documented investigation of violations of Technical Specifications per existing administrative requirements. Station Administrative Procedures AD 1804.00 "Reports Management", AD 1807.00 "Control of Conditions Adverse to Quality", and Davis-Besse, Unit 1, Technical Specifications currently require a Station Review Board investigation of all Technical Specification violations including preparation and forwarding reports covering evaluations and recommendations to prevent recurrence to the Vice President, Energy Supply and to the Chairman of the Company Nuclear Review Board.

3. A review of NRC Inspection Reports for the year 1979 has determined that similar problems of this nature have occurred. A Deviation Report has been prepared to identify these violations of Technical Specification 6.5.1.6.e so as to permit a Station Review Board examination of these events. Full compliance will be achieved by December 31, 1979.

Your very truly,

Richard P. Crouse

Richard P. Crouse
Vice President, Energy Supply

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