

March 4, 1980



Docket No. 50-346

License No. NPF-3

Serial No. 1-117

RICHARD P. CROUSE
Vice President
Nuclear
(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 February 12, 1980 letter (Log No. 1-310) and enclosures, Appendix A and Report 79-30, referencing apparent deviations from Davis-Besse Nuclear Power Station Unit 1 commitments to the NRC listed as a "Deficiency", and "Infractions" in Appendix A.

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

Deficiency: 10CFR 50, Appendix B, Criterion XVII states that records shall be identifiable and retrievable and that the applicant shall establish requirements concerning record retention, such as duration, location and assignment of responsibilities.

ANSI N45.2.9 and AD 1848.04 require that measures be established which ensure that quality assurance records are properly collected, stored and maintained.

Contrary to the above, a limited access list was not established to control access to the Station Central Files as required by AD 1848.04 and the Allowable Operating Transient Cycle Log Book was not kept current.

Response: 1. Discussions were held with Station Section Heads to determine what the needs of each section were with respect to file access. A list of personnel from each section was requested, to serve as a basis for establishing an Authorized Access List.

Major Modification M-3697 to AD 1848.04 has been written and approved by the Station Superintendent. This Major Modification establishes an Authorized Access List identifying who may utilize documents which require limited access.

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Full compliance with AD 1848.04 has been achieved with the approval of Major Modification M-3697.

2. Per AD 1839.01, "Documentation of Allowable Operating Transient Cycles", the documentation for each AOTC shall be kept in the Trip and Transient Book under the control of the Technical Section, or must be retrievable from the Master File. The Trip and Transient Book is a working document which is kept current from a weekly review of logs and strip charts. While the Master File is not required to be kept current by the above, it realistically should be, for archival purposes. Though no infraction existed, AD 1839.01 has been modified to require both documents to be kept up to date. Full compliance will be achieved by March 6, 1980.

Infraction: 10 CFR 50, Appendix B, Criterion VI, Document Control states that "measures shall be established to control the issuance of documents, such as instructions, procedures and drawings, including changes there to, which prescribe all activities affecting quality." ANSI N18.7 - 1972, Paragraph 5, Facility Administrative Policies and Procedures 2060 "Document Control" also state the requirements to control the issuance of documents and the changes to be incorporated there to.

Contrary to the above, the inspector found that a number of plant drawings were not being kept up-to-date and obsolete documents are not being properly controlled.

Response: 1. All controlled copies of M001-M051 drawings at the Station were replaced with a complete new set of drawings which include the latest revisions and applicable DCN's.

The distribution and control of the drawings is now being more closely monitored. When superseded drawings are not returned according to the log the controlled copy holder is contacted and verbally requested to return superseded drawings.

Full compliance has been achieved.

2. The drawing room clerk was instructed how to properly log the distribution and receipt of superseded drawings per procedure AD 1848.05.01. The requirements of AD 1828.13 have been met by the Office Supervisor meeting with the clerk and instructing her per the appropriate requirements.

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• Closer supervision of the drawing room clerk and more frequent review of her records is serving to alleviate the problems identified herein.

Continued supervision will serve to achieve full compliance with the applicable procedures.

Infraction: Technical Specifications 6.5.2.7.e states that "the CNRB shall review violations of codes, regulations orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance. Technical Specification 6.5.2.10.b states that "reports of reviews encompassed by section 6.5.2.7 shall be prepared, approved and forwarded to the Executive Vice President, Operations and CNRB members within 14 days following completion of review."

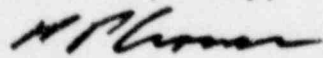
Contrary to the above requirements, the inspector found that violations of Technical Specifications and regulations identified in NRC Inspection Reports 50-346/79-02, 79-16, 79-19 and 79-29 were not reviewed by the CNRB as required.

Response: Following the inspection ending December 20, 1979 the CNRB Chairman, in Meeting #51, apprised the CNRB membership of areas cited by the NRC inspector as requiring additional attention by the CNRB. Further reviews of the issue were conducted in CNRB Meetings #53 and #54. The responses to NRC Inspection Reports 50-346/79-02, 79-16, 79-19, and 79-29 have been issued to CNRB members for their review and discussion at the next CNRB meeting.

The CNRB Chairman has apprised the membership through discussions at CNRB Meetings #51, #53, and #54 of the CNRB review responsibilities set forth in the Davis-Besse Unit 1 Technical Specification and in the CNRB Charter. In the future, responses to violations of Technical Specification and regulations identified in NRC Inspection Reports (which also cite the violation) will be issued to the CNRB members, and will subsequently be open for discussion at properly constituted CNRB meetings. CNRB action will be duly noted in CNRB meeting minutes, and appropriate reports made to the Toledo Edison President whose position has superseded that of the Executive Vice President.

Action has been taken to assure distribution of future NRC Inspection Report responses to CNRB members. The cited Inspection Report responses will be open for discussion at a CNRB meeting before March 28, 1980.

Yours very truly,



R. P. Crouse
Vice President, Nuclear

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