Docket No. 50-346 License No. NPF-3 Serial No. 609 April 16, 1980



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

Director of Nuclear Reactor Regulation
Attention: Mr. Robert N. Reid, Chief
Operating Reactors Branch No. 4
Division of Operating Reactors
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Reid:

On March 18, 1980 representatives from your organization, Florida Power Corporation, Babcock & Wilcox (B&W) and all operating licensees owning B&W nuclear steam supply systems met in your offices to discuss the February 26, 1980 transient at Crystal River Unit No. 3 (CR-3). Toledo Edison's letters of March 12 and 17, 1980 (Serial Nos. 596 and 599) responded to your staff's requests documented in your letter of March 6, 1980. On March 24, 1980 (Serial No. 603) Toledo Edison provided a commitment to your staff pertaining to additional actions for the Davis-Besse Nuclear Power Station, Unit 1 (DB-1) related to the CR-3 transient.

Many of the details of several of these commitments rely on the completion of our response to IE Bulletin 79-27. Our March 12, 1980 submittal identified an expected completion date of April 15, 1980. Due to the expanded scope of review of the Bulletin the scheduled completion date is now May 6, 1980.

To avoid delay in providing some details of Toledo Edison's dommitments, items 1 and 2 of the March 24, 1980 letter are clarified below.

Item 1

"Actions which will allow the operator to cope with various combinations of loss of instrumentation and control functions that are caused by a single electrical fault or active failure. This includes changes in (A) equipment and control systems to give clear indications of functions which are lost or unreliable; (B) procedures and training to assure positive and safe manual response by the operator in the event that competent instruments are unavailable."

Clarification

Two modifications are proposed at DB-1 that will aid the operator in his response during such a loss in instrumentation and control function. These include:

- a) The pilot operated relief valve (PORV) will close upon loss of power.
- b) The pressurizer spray valve will close upon loss of power.

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These modifications are being completed during the current refueling outage.

In our March 12, 1980 letter the response to questions 2 and 4 identified sufficient instrumentation and controls to insure proper reactor shutdown and maintenance in hot shutdown conditions. System Procedure 1105.06 - "NNI Operating Procedure" is being reviewed and will be revised if necessary to detail the operator's action in the event of loss of indication and/or function. The DB-1 operators will be trained on this procedure as well as operating procedures for transition to cold shutdown. This will be completed prior to start-up after the current refueling outage.

Item 2

"Verification of the effects of various combinations of loss of instrumentation and control functions by design review analysis and by test."

Clarification

Details of the testing procedure are not complete but in general will consist of:

- a) Removal of a power supply source.
- b) Observation and recording of the effects of the power supply loss.
- c) Restoration of each power supply.

This procedure will be completed for each of the non-nuclear instrumentation/integrated control system power supplies.

Very truly yours,

RPC: TJM: cts

cc: Mr. James G. Keppler Regional Director, Region III Office of Inspection and Enforcement

Mr. Luis Reyes NRC - Site Inspector

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