



September 12, 1978

Docket No. 50-346  
License No. NPF-3  
Serial No. 1-32

JAMES S. GRANT

Vice President  
Energy Supply  
(419) 259-5232

Mr. J.G. Keppler, Director  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Toledo Edison acknowledges receipt of your August 23, 1978 letter and enclosures Appendix A and Report 78-17, referencing apparent deviations from Davis-Besse Nuclear Power Station Unit 1 commitments to the NRC listed as "Infractions" in Appendix A.

Infraction: 1. 10 CFR 20.201(b) requires a licensee to make or cause to be made such surveys as may be necessary for him to comply with the regulations in 10 CFR Part 20. Section 20.203(b) requires radiation areas be conspicuously posted.

Contrary to the above, surveys were not performed at the perimeter fence of the Rad Waste Storage Pad after additional drums of compacted radioactive waste material were placed on the pad and existing drums rearranged on June 27, 1978. Consequently, a 13 mr/hr radiation area exterior to the fence which resulted from the placement and rearrangement of the drums was not posted as a radiation area.

Response: Corrective action taken and results achieved.

Upon discovery of this condition, the drums were rearranged properly, the area was resurveyed and properly posted.

Corrective action to be taken to avoid further noncompliance.

This incident was reviewed with all Chemistry and Health Physics personnel, stressing the importance of radiation surveys and adherence to procedures.

The date when full compliance will be achieved.

Full compliance was achieved on July 5, 1978.

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Infraction: 2. Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering the activities referenced below:

The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972.

Surveillance and test activities of safety-related equipment:

- a. Contrary to the above, Emergency Procedure EP 1202.03, Step 3.2, was not implemented in that the Auxiliary Transformer Breaker to 13.8 KV Bus was not opened prior to transferring unit loads to startup transformers when "A" bus transfer was first attempted on November 29, 1977.

Response:

Corrective action taken and results achieved.

The individuals responsible for not following Step 3.2 of EP 1202.03 have been informed of the importance of adherence to procedures.

Corrective action taken to avoid further noncompliance.

Operators have been given a lecture on the incident and its consequences. As well as routing to concerned personnel on a "Required Reading List," a description and analysis of the event. As a result of your inspector's concerns, a more detailed description of the event will be routed on a "Required Reading List."

The date when full compliance will be achieved.

Full compliance will be achieved by September 30, 1978.

- b. Contrary to the above, Test Procedure 800.00, Section 5.10, was not implemented in that the capability of the incore detectors for determining worst case thermal conditions was not verified prior to escalating power above 75% of rated power on January 20, 1978.

Response:

Corrective action taken and results achieved.

Corrective action in this case did not apply since the fuel loading was changed subsequent to 1/20/78.

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Corrective action to be taken to avoid further noncompliance.

Administrative controls will be implemented which include:

1. Improved criteria for determining incore failure.
2. Guidance to insure conservative values are used for failed incore detectors in high power assemblies or other critical assemblies used for test data.

Personnel involved have been informed of the importance of adherence to procedures.

Date when full compliance will be achieved.

Full compliance will be achieved by October 15, 1978.

- c. Contrary to the above, as of June 29, 1978, procedure AD 1801, Section 2.2.11, was not implemented in that the Company Nuclear Review Board had not reviewed any completed test results and reported its findings and recommendations to the Vice President Facilities Development and the Station Superintendent.

Response:

Corrective action taken and results achieved.

The CNRB has scheduled to review current and future Power Escalation Sequence Tests and report its findings and recommendations to the Vice President Facilities Development and the Station Superintendent.

Corrective action to be taken to avoid further noncompliance.

Individuals involved have been made aware of these requirements.

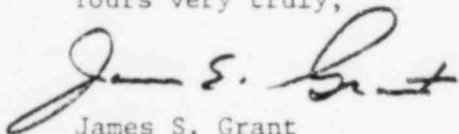
The date when full compliance will be achieved.

Full compliance will be achieved within 30 days of the completion of the Power Escalation Sequence Testing and resolution of associated test deficiencies.

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An overview of these infractions reveals they are generically instances of failure to follow procedures. This concern is being treated as described in our response of July 24, 1978 to Report 78-13, and as discussed in the NRC OIE Management Meeting of August 16, 1978.

Yours very truly,

A handwritten signature in dark ink, appearing to read "James S. Grant". The signature is fluid and cursive, with the first name "James" and last name "Grant" clearly distinguishable.

James S. Grant  
Vice President, Energy Supply

JSG/TDM/WHG/daw



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

FILE

AUG 23 1978

Docket No. 50-346

Toledo Edison Company  
ATTN: Mr. James S. Grant  
Vice President - Energy  
Supply  
Edison Plaza  
300 Madison Avenue  
Toledo, OH 43652

Gentlemen:

This refers to the inspection conducted by Mr. J. S. Creswell of this office on April 4-7, May 17-19, 25, June 27-30, July 20-21, and July 27-28, 1978, of activities at Davis Besse Nuclear Plant authorized by NRC Operating License No. NPF-3 and to the discussion of our findings with Mr. T. Murray at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in noncompliance with NRC requirements, as described in the enclosed Appendix A.

This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within twenty days of your receipt of this notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

In our letter to you dated June 28, 1978, we brought to your attention instances which we considered were symptomatic of a general degradation in adherence to your management control systems. Appendix A to this letter identifies additional matters which we feel relate to our stated concern. Although

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AUG 23 1978

we recognize that the matters described in Appendix A to this letter occurred prior to your July 24, 1978, response to our June 28, 1978 letter, we expect you to factor them into your continued review and upgrading of your management controls.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC's Public Document Room, except as follows. If the enclosures contain information that you or your contractors believe to be proprietary, you must apply in writing to this office, within twenty days of your receipt of this letter, to withhold such information from public disclosure. The application must include a full statement of the reasons for which the information is considered proprietary, and should be prepared so that proprietary information identified in the application is contained in an enclosure to the application.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

James G. Keppler  
Director

Enclosures:

1. Appendix A, Notice of Violation
2. IE Inspection Report  
No. 50-346/78-17

cc w/encs:

Mr. T. D. Murray, Station  
Superintendent  
Central Files  
Reproduction Unit NRC 20b  
PDR  
Local PDR  
NSIC  
TIC  
U. Young Park, Power  
Siting Commission

OFFICE	RIII	RIII	RIII	RIII	RIII	RIII
	<i>JSC</i>	<i>SS</i>	<i>g</i>	<i>N</i>	<i>AM</i>	<i>JK</i>
SURNAME	Creswell/bk	Streeter	Fiorelli	Tambling	Corelius	Keppler
DATE	8/18/78	8/18/78			8/24/78	

Appendix A

NOTICE OF VIOLATION

Toledo Edison Company

Docket No. 50-346

Based on the inspection conducted on June 27-30, 1978, it appears that certain of your activities were in noncompliance with NRC requirements, as noted below. The two items are Infractions.

1. 10 CFR 20.201(b) requires a licensee to make or cause to be made such surveys as may be necessary for him to comply with the regulations in 10 CFR Part 20. Section 20.203(b) requires radiation areas be conspicuously posted.

Contrary to the above, surveys were not performed at the perimeter fence of the Rad Waste Storage Pad after additional drums of compacted radioactive waste material were placed on the pad and existing drums rearranged on June 27, 1978. Consequently, a 13 mr/Hr radiation area exterior to the fence which resulted from the placement and rearrangement of the drums was not posted as a radiation area.

2. Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering the activities referenced below:

The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.3 3, November, 1972.

Surveillance and test activities of safety-related equipment.

- a. Contrary to the above, Emergency Procedure EP 1202.03, Step 3.2, was not implemented in that the Auxiliary Transformer Breaker to 13.8 KV Bus A was not opened prior to transferring unit loads to Startup Transformers when "A" bus transfer was first attempted on November 29, 1977.
- b. Contrary to the above, Test Procedure 800.00, Section 5.10 was not implemented in that the capability of the incore detectors for determining worst case thermal conditions was not verified prior to escalating power above 75% of rated power on January 20, 1978.

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- c. Contrary to the above, as of June 29, 1978, procedure AD 1801, Section 2.2.11, was not implemented in that the Company Nuclear Review Board had not reviewed any completed test results and reported its findings and recommendations to the Vice President Facilities Development and the Station Superintendent.



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

REGION III

Report No. 50-346/78-17

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 Station, Unit 1

Inspection At: Davis-Besse Site, Oak Harbor, OH

Inspection Conducted: April 4-7, May 17-19, 25, June 27-30, July 20-21,  
and July 27-28, 1978

Inspectors: *J. S. Creswell*  
J. S. Creswell

*G. E. Norlin*  
for G. Phillip

Approved By: *J. F. Streeter* for  
J. F. Streeter, Chief  
Nuclear Support Section 1

Aug 14, 1978

8/15/78

8-14-78

Inspection Summary

Inspection on April 4-7, May 17-19, 25, June 27-30, July 20-21 and 27-28, 1978  
(Report No. 50-346/78-17)

Areas Inspected: Routine, unannounced inspection of startup testing and tour of outside areas. The inspection involved 142 inspector-hours onsite by three NRC inspectors.

Results: Of the two areas, one item of noncompliance was identified in one area (Infraction - failure to conduct radiation surveys - Paragraph 7) and an item of noncompliance (Infraction - failure to follow procedures, Paragraphs 2, 5b and 6) were identified in the other area.

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