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Docket No. 50-346

February 18, 1977

Serial No. 221

Mr. James G. Keppler  
Regional Director, Region III  
Directorate of Regulatory Operations  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Toledo Edison acknowledges receipt of your February 3, 1977 letter and enclosed inspection report referencing the apparent noncompliances with NRC regulations. These items resulted from the site inspection conducted by your office on November 30, December 1, 2 and 14-16, 1976.

Toledo Edison offers the following information regarding these apparent noncompliances, including corrective action and steps taken to avoid further occurrences.

Infractions

- A. "Contrary to 10 CFR Part 50, Appendix B, Criterion XI, and the Toledo Edison Company Specification 7749-E-20, Section 16.3, 16.4 and 16.5, a test program was not established to perform tests to demonstrate that Class 1E battery chargers and regulated rectifiers would perform satisfactorily in-service, after extensive rework and modifications had been performed. (Paragraph 2, Section iii, Report Details)"

Toledo Edison has obtained from Cyberex a procedure for "Field Electrical Performance Test for Modified Battery Charger". The Cyberex procedure identified specific retest requirements to assure the rework and modifications had been performed on the battery chargers. The procedure incorporated the method in which these tests were actually initially performed during late 1975. Cyberex also has submitted results of field electrical performance tests and certification of rework and modifications in accordance with the procedure. The test procedure, test results, and recertification have been reviewed and approved by Bechtel Engineering, and Toledo Edison Quality Assurance. This documented test program provided assurance that the battery chargers will operate properly in service.

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The above program was completed on February 17, 1977. To preclude the same conditions from recurring, all future battery charger equipment modifications will be more closely monitored by Toledo Edison in order to insure that proper documentation has been provided.

- B. "Contrary to 10 CFR Part 50, Appendix B, Criterion XVI and the Toledo Edison Company FSAR Chapter 17, Subsection 17.1.2.16, the licensee failed to ensure that adequate corrective action was taken by the Heating, Ventilating and Air Conditioning Contractor, Lumm-Irsay relative to deficient items identified in audit reports. (Paragraph 4.c, Section IV, Report Details)

During periodic TECo QA audits of Lumm-Irsay (L-I) in February, 1975, Toledo Edison had identified discrepancies in the L-I Quality Assurance Program with respect to weld inspection and the inspection personnel qualification records of L-I QC Technicians.

The discrepancies identified in the L-I weld inspection noted a conflict between the weld inspection requirements of the L-I QA program and their welding procedures. The L-I welding procedures stated that weld inspection would be accomplished in accordance with AWS D1.0-69, Section 6, while the L-I weld inspection procedure contained in Section 5 of the L-I QA Manual did not encompass all aspects of AWS D1.0-69. Since the requirements of the L-I QA Manual were being used, L-I revised the appropriate welding procedures to require that inspections be performed in accordance with their QA Manual. The revised L-I welding procedures were approved by Bechtel Engineering in July, 1975.

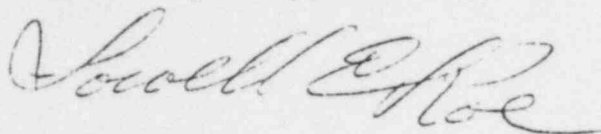
The L-I QC Technician referenced in your inspection report has been reassigned and is no longer in L-I QC. A documented statement that the present L-I Field QC Technicians are qualified for their positions is on file and available from the L-I QC Supervisor.

TECo QA formally instructed Bechtel QC, on December 20, 1976, to increase the Bechtel QC surveillance of L-I welding and document their findings. Bechtel QC Corrective Action Field Inspection Reports are generated to identify discrepant items and require corrective action to be taken to ensure satisfactory completion of rework. In addition, TECo QA requested that Bechtel QC review past welding performed and inspected by L-I prior to December 20, 1976. Due to discrepancies noted on the previous welding, L-I was directed the Bechtel Field Construction Manager to perform a reinspection of welds on accessible seismic supports. Bechtel Field QC is, and will continue to, reinspect the L-I reinspection on a random basis. It is anticipated this reinspection will be completed prior to February 25, 1977, in the containment building. Reinspection in all other areas will be completed prior to March 25, 1977.

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L-I held a weld inspection training program on February 12, 1977 for their QC personnel.

Yours very truly,

A handwritten signature in cursive script, appearing to read "Lowell E. Roe".

LER:ss