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

REGION III

Report No. 50-346/80-07

Docket No. 50-346

Licensee: Toledo Edison Company Edison Plaza 300 Madison Avenue Toledo, OH 43652

Facility Name: Davis-Besse 1

Meeting At: Region III Office

Meeting Conducted: Feburary 29, 1980

Inspectors: L. A. Reyes T. N. Tambling T. N. Tambling Approved By: R. F. Heishman, Chief,

Reactor Operations and Nuclear Support Branch

Meeting Summary

Meeting February 29, 1980 (Report No. 50-346/80-07)

Subject of Meeting: An announced meeting was held with corporate and site management to discuss current operating shift staffing concerns and results of a security inspection. The meeting lasted approximately 31/2 hours and NRC representatives included IE Headquarters and Region III personnel.

Results: The licensee committed to immediate implementation of three short term actions to strengthen the experience level of non-licensed personnel on the five operating shifts until the reactor is shutdown for the scheduled refueling outage. For the long term the licensee was committed to meet the operating shift staffing requirements of the December 1979 draft of ANS 3.1 Standard prior to returning the reactor to operation from the refueling outage. An order to modify the licensee was issued on March 5, 1980 to confirm these commitments. No items of noncompliance or deviations were identified within the scope of this meeting.

3/24/80 3/25/80

DETAILS

Attendees from Toledo Edison Company 1.

W. A. Johnson, President and Chief Operating Officer

R. P. Crouse, Vice President, Nuclear

L. C. Philips, Vice President, Administrative Services

T. D. Murray, Station Superintendent

M. R. Polk, Director, Industrial Security

C. M. Rice, Consultant

Attendees from NRC

- J. G. Keppler, Director, RIII
- N. C. Moseley, Director, DROI, I&E HQ
- G. W. Roy, Deputy Director, RIII
- C. E. Norelius, Assistant to the Director, RIII
- J. Lieberman, ELD, HQ
- R. F. Heishman, Chief, RO&NS Branch, RIII

R. F. Warnick, Chief, Project Section 2-1, RIII

- T. N. Tambling, Acting Chief, Project Section 2-2, RIII
- L. A. Reyes, Senior Resident Inspector, RIII
- J. A. Hind, Chief, Safeguards Branch, RIII
- J. F. Donahue, Chief, Securtiy & Investigation Section, RIII
- T. J. Madeda, Security Inspector, RIII

2. Background

This meeting was the fifth of a series of management meetings requested by Region III to discuss the corrective action being taken by Toledo Edison Company to improve their management controls and plant operation and to hold an enforcement conference on the results of a security inspection conducted January 1980. Due to a major concern that developed in the week prior to the meeting as a result of direct questioning of plant personnel only two subjects were discussed. These two items were the training and experience levels of non-licensed operating personnel assigned to the shift crews and the findings of the security inspection. The status of other corrective actions currently being implemented by the Toledo Edison Company to improve their management controls and plant operations was deferred to the next meeting to be scheduled for April 1980.

3. Operating Shift Manning

A "ecent evaluation of the licensee's operation showed that despite ei s of the licensee to increase the staffing levels of the , it had not reached the desired level. Known turnovers, pla transfers and operator training had resulted in the use of overtime to maintain the operating shift manning levels.

In February 1980, a letter was sent from the plant reactor operators to the Vice President, Nuclear, expressing concern about the loss of qualified operators and requesting a meeting on February 17, 1980. While this letter was directed towards correcting the reason why reactor operators were leaving, it contained an implied concern about the present status.

During the week of February 18, 1980, the Resident Inspector interviewed plant operators to determine the extent of the concerns expressed in their letter to the Vice President. Under direct questioning the Resident Inspector was told by one operator that the staffing problems were so significant that the plant was unsafe to operate.

On February 25, 1980, the Director of Region III and the Director, Division of Reactor Operations Inspection, IE interviewed plant operators. Perceived problems of excessive work hours and inadequate training were identified during these interviews. Some of those interviewed, including two senior licensed operators stated that in their view some shifts did not have adequately qualified people to successfully handle an emergency. None of those interviewed rated the plant as being any better than marginally safe.

Additional investigation was conducted onsite on February 26 and 27, 1980. These investigations showed that while the licensee meets the staffing requirements of its license, concerns remain regarding the adequacy of training of nonlicensed personnel, the ability to respond to emergency conditions, and the overall depth of the staff. Specifically:

- Six of the more experienced equipment operators had been effectively removed from regular shift work to train to become licensed operators;
- b. Some of the remaining equipment operators have been trained on the equipment only in certain zones. While this is adequate for routine shift operations, these equipment operators are not trained on all safety related equipment such that they could be relied upon if needed in other work zones during an emergency.
- c. There was little flexibility to accommodate the loss of staff because of sickness or other work leave. Such problems result in additional overtime work requirements.

Corrective Action to the Staffing Problems

The licensee was asked to address what immediate and long term action they would take to correct the identified operating shift staffing problems. Based upon the specific concerns, the representatives of the licensee stated that they would:

- a. Immediately return six experienced and fully qualified equipment operators, who have been involved in operator license training, to regular shift work to provide two fully qualified equipment operators for each operating shift. The additional qualified individuals will remain on shift duty until such time as they are relieved from duty by other fully qualified individuals who are appropriately trained and certified by the licensee's training department.
- b. Provide one additional person for each day shift to relieve the shift foreman of nonlicensed administrative responsibilities.
- c. Expedite the on-the-job training schedule for existing equipment operators who are not yet fully qualified. This program would be accomplished by personnel from Toledo Edison Company or an outside contract organization and would continue at least until the refueling outage.
- d. Review the requirements for nonlicensed operating personnel contained in the December 1979 draft ANS Standard 3.1 and determine the feasibility of meeting these requirements prior to return of the station to operation after the scheduled April 1980 refueling outage.

This corrective action was the subject of an order modifying the license on March 5, 1980.

5. Security Enforcement Conference

The January 1980 security inspection identified nine items of noncompliance. The licensee was informed of Region III concerns about the proper implementation of the security plan. The items of noncompliance with the licensee security plan were discussed. It was pointed out that these items of noncompliance could have been identified and corrected by the licensee if there were greater attention given to the implementation of the security program by both site and corporate security management. The licensee was informed that an enforcement letter was being processed covering the result of the January 1980 inspection. The letter would request them to take appropriate corrective action. The licensee was also informed that any future failures to properly implement the security program would result in escalated enforcement action.

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