

Docket No. 50-346 License No. NPF-3 Serial No. 1-123 March 28, 1980 RICHARD P. CROUSE Vice President Nuclear (419) 259-5221

Mr. James E. Keppler
Regional Director, Region III
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Following discussions in your office on February 29, 1980, the Director of the Office of Inspection and Enforcement issued an order on March 5, 1980 modifying the license of the Davis-Besse Nuclear Power Station Unit 1. Section VII.2 of the March 5 Order states:

"Prior to return of the station to operations from the scheduled April 1980 refueling outage, each operating shift shall have a complete complement of fully trained personnel in accordance with the staffing and qualification levels set forth in draft ANSI Standard 3.1."

In discussions with you and your Staff, we have identified certain ambiguities in this section due to the current status and scope of the referenced standard. To resolve these questions and to set forth our intended method of complying with Section VII.2 of the Order, we propose the following:

- 1. The "draft ANSI Standard 3.1" referenced in the Order is the December 6, 1979 draft revision of ANS-3.1 "Standard For Qualification and Training of Personnel for Nuclear Power Plants" with revised pages as of December 21, 1979. This is the version exchanged at the February 29, 1980 meeting.
- 2. The "complete compliment" for each "operating shift" is identified in Table 6.2-1 of the Davis-Besse Nuclear Power Static 1 Unit 1 Technical Specifications, Appendix A for each operational mode. This also defines the operating shift staffing levels.
- 3. The qualification and training levels of those individuals identified in 2 above shall meet the following guidelines set forth in the draft ANS Standard.
  - Senior Operating License Sections 4.1 and 4.3.1.2.a through c

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- b. Operating License Sections 4.1 and 4.5.1.2.a through c
- c. Nonlicensed Sections 4.1 and 4.5.1.1.a through d

Toledo Edison will meet the staffing and training requirements identified above prior to restart after the pending spring, 1980 refueling outage.

Very truly yours,

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Mr. Victor Stello, Director Office of Inspection and Enforcement

Mr. Louis Reyes D-B Resident Inspector Region III Office of Inspection and Enforcement