

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

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FEB 18 1977

Toledo Edison Company
ATTN: Mr. Lowell E. Roe
Vice President
Facilities Development
Edison Plaza
300 Madison Avenue
Toledo, Ohio 43652

Docket No. 50-346

Gentlemen:

This refers to the inspection conducted by Messrs. R. D. Martin, T. N. Tambling, J. E. Kohler, W. S. Little and R. J. Cook of this office on January 3, 11-14 and 25-27, 1977, of activities at Davis-Besse Unit 1 Construction site authorized by NRC Construction Permit CPPR-80 and to the discussion of our findings with you and members of your staff 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.

No items of noncompliance with NRC requirements were identified during the course of this inspection.

During the inspection dealing with the review of the 1976 Integrated Leak Rate Test (see Management Interview of January 3, 1977, and paragraph 7 of the Report Details), and based on our inspector's understanding, your representatives agreed to provide this office with certain information regarding procedural controls relating to local leak rate testing and acceptance criteria for containment isolation valve maintenance. Therefore, we request that the following information be provided within thirty days of your receipt of this letter:

- a. The manner in which you will evaluate equipment hatch leakage test results to assure compliance with the Technical Specifications as shown in T.S. Table 3.6-1.



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- b. The manner in which you will monitor the effects of subsequent local leak rate testing of penetrations to assure compliance with the Technical Specifications.
- c. The manner in which the licensee will establish the leak rate acceptance criteria for individual containment isolation valves following repair of such a valve, and the required acceptance testing to be performed.

Please note that we are requesting general information on the controls to be established; the specific controls are not required until such activities take place, and will be reviewed in detail during a later, appropriate inspection.

With regards to your preoperational testing program, we wish to reemphasize to you our position, which has been discussed with you on several occasions in the past, that the results of preoperational tests which are to be completed prior to fuel loading must be reviewed and approved by the appropriate levels of management before we can make a finding that your facility is prepared to load fuel. Recent inspections have led us to conclude that the rate of review and analysis of test results by your staff is not commensurate with the rate of conducting tests. We are, therefore, concerned that the backlog of safety related tests requiring review and analysis may become a major constraint to a finding on our part of your readiness to load fuel.

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 and the enclosed inspection report will be placed in the NRC's Public Document Room, except as follows. If this report contains 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.

Toledo Edison Company

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

Sincerely yours,

James G. Keppler
Regional Director

Enclosure:
IE Inspection Report
No. 050-346/77-03

cc w/encl:
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
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TIC
U. Young Park, Power
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