

GLENN J. SAMPSON  
Vice President, Power

March 2, 1973

Docket No. 50-346

Mr. Boyce H. Grier,  
Regional Director  
U.S. Atomic Energy Commission  
Directorate of Regulatory Operations  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

POOR  
ORIGINAL

Dear Mr. Grier:

Toledo Edison acknowledges receipt of your January 10, 1973, letter and enclosure referencing an apparent violation of AEC regulations and a nonconformance with our quality assurance program. These two items resulted from site inspections conducted by your office on November 29-30, 1972, and December 12-13, 1972.

Following a thorough examination of the two items of concern, Toledo Edison offers the following information regarding these apparent violations including corrective action and steps that have been taken to avoid further occurrences.

Item 1 - Nonconforming Piping

This concerns the ASME Section III piping spools which had been fabricated at the Kernersville Plant of ITT Grinnell and which contained fit-up tack welds made by previously unqualified welders. This deficiency was considered as a nonconformance at the Kernersville Plant regarding manufacturing procedures which did not place the affected field-delivered pieces in a nonconformance status. The resolution of the problem was given in its entirety to Grinnell subject to conditions presented by Toledo Edison, through Bechtel, to Grinnell. Grinnell, Kernersville, working in close conjunction with the authorized ASME code inspector within their fabricating shop, had promptly resolved the means whereby the unqualified tack welders could be properly certified, such as, with radiography; therefore, not requiring Grinnell's use of nonconformance procedures regarding the affected pipe spool pieces.

The affected pieces received at the Davis-Besse site were not treated as nonconformances until after the AEC site audit of December 12-13, 1972. After this audit, they were appropriately tagged in the field as nonconforming, awaiting the Grinnell detailed report preparation, submittal and approval by the Davis-Besse project engineers. Following the January 31,

Mr. Boyce H. Grier  
Page 2  
March 2, 1973

1973, acceptance of the Grinnell report, the tags were removed from the spools in the field. Grinnell's report was submitted by Toledo Edicon to AEC-DRO under separate report, dated February 12, 1973.

Even though the quality of the affected site-delivered pieces was not in question, they should have been identified, tagged, handled, and disposed of in accordance with established procedures for nonconforming items because their fabrication had involved nonconforming practices.

All appropriate personnel in the organizations involved have been instructed to pay particular attention to the requirements of nonconformance procedures in any similar situation. Toledo Edison's quality assurance group will give added attention to this area to prevent a similar occurrence.

Item 2 - Significant Deficiency Reporting per 10 CFR Part 50.55(e)

This also concerns the ASME Section III piping fabricated at the Kernersville Plant of ITT Grinnell which had been fabricated utilizing previously unqualified welders to perform fit-up tack welds.

This nonconformance had not been considered a major deficiency since the quality of the piping spools involved was not affected and the nonconformance at the fabricator's plant was discovered by routine inspection and surveillance on the part of Toledo Edison and Bechtel as their agent for shop inspection.

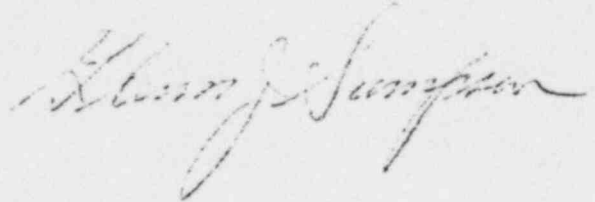
This nonconformance was discussed during telephone conversations with your representative and further reviewed during the site inspections on November 29-30 and December 12-13, 1972, at which time your representatives stated that it was their opinion that this nonconformance should be considered as a significant deficiency and reported pursuant to 10 CFR Part 50.55(e). This nonconformance was reported as a significant deficiency by letter, dated January 18, 1973, following receipt of your letter of January 10, 1973. A further detailed report has been submitted by letter of February 12, 1973, including a report prepared by ITT Grinnell which contains a complete resolution.

The requirements of 10 CFR Part 50.55(e) will be reviewed in regard to any significant deficiency which might be found to have occurred to ascertain if such a deficiency should be reported. If in doubt, your office will be contacted for clarification.

Mr. Boyce H. Grier  
Page 3  
March 2, 1973

We believe this letter, together with the report dated February 12, 1973, on the nonconformance, has provided all information required; however, if there are any questions or additional information desired, please contact us.

Yours very truly,

A handwritten signature in cursive script, appearing to read "George J. Simpson".

GJS:cd