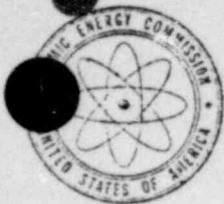


Reply



UNITED STATES
ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

TELEPHONE
(312) 858-2650

January 10, 1973

Toledo Edison Company
ATTN: Mr. Glenn J. Sampson
Vice President, Power
Edison Plaza
300 Madison Avenue
Toledo, Ohio 43652

Docket No. 50-346

Gentlemen:

This refers to the inspections conducted by Messrs. Erb, Hayes, and Rohrbacher of this office on November 29 and 30, 1972, and by Messrs. Young and Erb on December 12 - 13, 1972, of construction activities at the Davis-Besse site authorized by AEC Construction Permit No. CPPR-80 and to the discussion of our findings at the conclusion of the inspections with you and Messrs. Roe, Lenardson, Haigh, Eichenauer, Moring, and others of your staff.

Areas examined during the inspection included electrical cable installation and separation criteria; the quality assurance/quality control programs and installation activities related to Class I piping and other Class I components; quality control program implementation relative to structural supports for the reactor pressure vessel, steam generators, and primary coolant pumps; and the handling and storage of the reactor pressure vessel and steam generators. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with plant personnel, and observations by the inspectors.

During these inspections, it was determined that certain of your activities appear to be in violation of AEC requirements and/or in nonconformance with statements in your quality assurance manual. The activities and references to the pertinent requirements are listed in the enclosure to this letter.

This letter is a notice of violation sent to you pursuant to the provisions of Section 2.201 of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within thirty (30) days of the date

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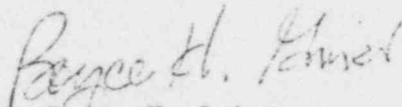
January 10, 1973

of this letter, a written statement or explanation in reply including: (1) corrective steps which have been taken by you, and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved.

with regard to questions raised during this inspection, we understand that you intend to: (1) assure that the manufacturer's data report for the primary coolant recirculation piping is onsite prior to installation of the pipe, and (2) review the Final Safety Analysis Report to ascertain that all electrical separation and protection criteria are clearly defined. We will examine your action on these matters during our next routine inspection.

Should you have questions concerning this inspection, we will be glad to discuss them with you.

Sincerely yours,



Boyce H. Grier
Regional Director

Enclosure:
Description of Violations

ENCLOSURE

Docket No. 50-346

Certain of your activities appear to be in violation of AEC regulations and in nonconformance with your quality assurance program, as identified below:

1. 10 CFR Part 50, Appendix B, Criterion XV, states, in part, that: "Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. These measures shall include, as appropriate, procedures for identification, documentation, segregation, disposition, and notification to affected organizations"

The Toledo Edison Quality Assurance Manual provides for issuance of a nonconformance report when nonconforming material, components, or equipment is detected.

Contrary to the above requirements, nonconforming Class I piping was not identified or segregated upon receipt at the site to prevent its inadvertent use or installation. Moreover, a nonconformance report relating to this material had not been issued.

2. 10 CFR Part 50.55(e) requires, in part, that the holder of a construction permit shall promptly notify the appropriate Atomic Energy Commission Regional Office and submit a written report, within 30 days, to the Director of Regulatory Operations of a significant deficiency in construction which, were it to have remained uncorrected, could have affected adversely the safety of operations of the plant at any time throughout the expected lifetime of the plant and which represents a significant breakdown in any portion of the quality assurance program conducted in accordance with the requirements of Appendix B.

Contrary to the above requirements, the Atomic Energy Commission was not promptly notified, nor was a written report submitted, covering a significant number of spools of shop fabricated Class I piping which were found to have been tack welded by welding personnel not qualified in accordance with the applicable codes. Furthermore, the use of unqualified welders during fabrication of the subject piping indicates a significant breakdown in the manufacturer's quality assurance program.