

U. S. ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS

REGION III

Report of Operations Inspection

RO Inspection Report No. 050-346/74-09

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

Davis-Besse Nuclear Power Station
Unit 1
Oak Harbor, Ohio

License No. CPPR-80
Category: A

Type of Licensee: PWR (B&W) - 872 MWe

Type of Inspection: Announced, Routine

Dates of Inspection: November 25, 26, and 27, 1974

Dates of Previous Inspection: November 5 and 6, 1974
(Environmental Monitoring)

Principal Inspector: R. D. Martin *R. D. Martin* 1/13/75
(Date)

Accompanying Inspector: H. C. Dance *H. C. Dance* 1/13/75
(Date)

Other Accompanying Personnel: None

Reviewed By: R. C. Knop *R. C. Knop* 1/13/75
Senior Inspector
Reactor Operations Branch
(Date)

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SUMMARY OF FINDINGS

Enforcement Action

A. Violations

No violations of AEC requirements were identified during the inspection.

B. Safety Matters

No safety matters were identified during the inspection.

Licensee Action on Previously Identified Enforcement Matters

Not applicable.

Design Changes: Not applicable.

Unusual Occurrences: No unusual occurrences were identified.

Other Significant Findings

A. Current Findings

The licensee has now completed and approved approximately 45% of the procedures identified for station operation (not including annunciator response procedures).

B. Status of Previously Reported Unresolved Items

Inspection Report No. 050-346/74-06 summarized, in the Management Interview Section, certain commitments made by the licensee. The following comments are applicable to certain of these commitments.

1. The licensee completed a review of the station start-up testing procedures for conformance with Regulatory Guide 1.68. As a result of that review, some additional procedure needs were identified and will be included in the start-up program.
2. The licensee has instituted a system, with appropriate procedural controls, for preventing the use of testing procedures which have blank spaces. The inspectors have no further questions on this matter with regard to testing procedures.

3. The licensee has established a procedure which, at the present time, assigns the Technical Engineer the responsibility of initially determining whether a particular procedure should undergo review by the Station Review Board. Because of commitments made during this inspection relative to the review of the classification of tests by the Station Review Board (Paragraph 7), the inspectors have no further questions on this specific matter.
4. The licensee was informed that a clarification of Regulatory Guide 1.68 with respect to preoperational tests of radioactive waste systems would be provided by inspectors from the Radiological Protection Branch during one of their inspections. The licensee was advised to seek a clarification of reactor protection system timing requirements from the Directorate of Licensing since this will be an item in the Technical Specifications for the facility.

Management Interview

- A. The following persons attended the management interview at the conclusion of the inspection:

Toledo Edison Company

J. Evans, Station Superintendent
T. Murray, Operations Engineer
L. Stalter, Technical Engineer
W. Green, Assistant to Station Superintendent
K. Cantrell, Quality Assurance Engineer
J. Hickey, Training

Babcock and Wilcox

E. Michaud, Test Program Manager

- B. Matters discussed and comments were as follows:

1. The inspectors reviewed the status of Training Programs for the station staff (both licensed and unlicensed) and no deficiencies were noted.
2. The inspectors noted that the records of training should be included among those station records which will receive consideration for their physical protection. The licensee stated that the issue of identification of records and their associated retention periods as well as facilities to provide for their physical protection is being evaluated by a consulting firm, and that it is their intent to include training records in this evaluation.

3. The licensee stated that he would review the job descriptions of personnel at the station who are to obtain operator licenses. He will then resolve with the Directorate of Licensing any questions that may arise regarding the type of licenses these personnel are to obtain.
4. The inspectors summarized their review of the background, experience, and status of personnel assigned to station operation and that no deficiencies were noted.
5. The records of selected training courses that have been conducted were reviewed and compared against their descriptions as presented in the FSAR. No deficiencies were noted. The inspectors indicated that they wished to obtain a copy of the AD 1828 series of procedures relative to training. The licensee agreed to provide a set when they are approved.
6. The backgrounds of individuals who are not Toledo Edison employees but who have been assigned responsibilities for portions of the start-up testing program were compared with the qualifications presented in the FSAR. No deficiencies were noted.
7. The licensee was informed that with respect to the start-up testing program:
 - a. The inspectors had no comments on the current status of the program.
 - b. The inspectors wish to obtain a revised start-up testing schedule after the schedule revision currently underway is completed. (Licensee agreed to forward copy when it is available.)
 - c. The Company Nuclear Review Board (CNRB) should come into existence at this time in order to implement their responsibilities under the start-up testing program. The licensee acknowledged this comment and indicated that this was underway. The licensee agreed to notify the inspector of when the first meeting occurs.
8. The inspector stated that the computer listing of nuclear safety related procedures for both the preoperational and operation phase is not consistent with the inspectors classification. Upon examination, the licensee acknowledged there were many errors. The licensee agreed to correct the errors on the computer listing and to have the SRB review the revised classification. (Paragraph 7)

REPORT DETAILS

Persons Contacted

The following persons, in addition to individuals listed under the Management Interview Section of this report, were contacted during the inspection.

Toledo Edison Company

B. Beyer, Maintenance Engineer
J. Zell, Assistant Engineer
L. Simon, Shift Foreman
L. Grime, Assistant Engineer
R. Franklin, Training Coordinator

Babcock and Wilcox

A. Mercado, Test Program Scheduler

Results of Inspection

1. The status of training programs for station personnel (licensed and unlicensed) was reviewed. Training of personnel to be licensed is progressing in accordance with schedules presented in the FSAR and the supplementary schedule discussed with the inspector during the inspection of September 3-4, 1974. This supplementary schedule was followed up to the time of this inspection (November 25-27). All training activities scheduled for after December 1, 1974, will be displaced by an as yet undetermined period of time because of the slippage in fuel loading date to January 1976 reported in Inspection Report No. 050-346/74-06. The licensee is in the process of developing an administrative series of procedures to govern all station staff training. This series (AD 1828.00) will cover training programs for licensed and unlicensed personnel. The licensee was informed of the inspectors intent to review these procedures and their associated programs as soon as they are available. The inspectors reviewed the subject matter to be covered by these procedures and no deficiencies were noted.

The training staff is in the process of developing the general safety training for all station personnel they are committed to in the FSAR and under the rules of 10 CFR 19. The licensee was informed that this program would be reviewed in a subsequent inspection. The station staff have already begun the on-the-job training phase

of their activities as described in Section 13.2.1.3 of the FSAR. The method of recording an individual's participation to assure adequate exposure to the various items listed in the section is still under review by the training group. This will be covered by the principal inspector in later inspection.

No deficiencies were noted in the status of training program development and the licensee's schedule of implementation when compared against the commitments made in Section 13.2 of the FSAR.

2. The records presently retained by the training coordinator were reviewed. At the present time, all station personnel are not included in the record system. This is intended to be accomplished by the licensee by March 15, 1975. This will be reviewed during a later inspection. The training records reflect prior background of personnel as well as specialized training received by the personnel after joining Toledo Edison. The information as to the prior background of personnel is obtained by the Training Coordinator from the employment records of the personnel department of Toledo Edison. The Coordinator does not independently verify the accuracy of the background qualifications. He stated that it was his understanding that the personnel department performed such a verification. The inspectors noted that the records do contain the information as stated in Section 13.2.4 of the FSAR as is appropriate in this stage of the program. However, it was determined that additional training either of a supplementary or remedial nature and that obtained from specialized vendor training was not maintained in the training records. Such additional training records are not referenced in Section 13.2.4 of the FSAR. The licensee was informed that such information if included in the training records, would not be a violation of any commitments made in the FSAR as regards the content of Training Records.

At the present time, the training coordinator retains the original training records file in his office area. The licensee was informed that since there is a commitment in the FSAR to retain these records, the present method and area of storage should be reviewed to assure that the records are receiving an adequate degree of physical protection. The licensee informed the inspectors that the entire matter of record storage for the station was under review by a consultant and that his recommendations are expected to include the handling of the training records. This matter will be reviewed during a later inspection.

3. The training records for the following personnel were reviewed to verify that the background qualifications, experience, and status of training of those individuals were in accordance with Section 13.1.3 of the FSAR, ANSI N-18.1-1971, and Appendix 13A of the FSAR.

<u>Position</u>	<u>Incumbent</u>
Station Superintendent	J. Evans
Operations Engineer	T. Murray
Shift Foreman	L. Simon
Shift Foreman	S. Hall
Supervising Operator	C. Hoffer
Supervising Operator	T. Lehman
Reactor Operator	L. Bladel
Reactor Operator	W. Nissen
Technical Engineer	L. Stalter
I & C Engineer	J. Orkins
Assistant Engineer	J. Lingenfelter
Assistant Engineer	D. Miller
Assistant Engineer	R. Zemenski
Sr. Lab. Testor	J. Tapley
Certified Welder	R. West
Power Plant Repairmen	R. Wymer
Group Leader	
Maintenance Foreman	F. Johnson
Power Plant Repairman	P. Gable

No deficiencies were noted in this comparison except as regards the holding or acquiring of licenses. This is the area covered by the training program still underway. Successful completion of this program by the staff would then provide a station staff meeting or exceeding the minimum qualification requirements of Section 13.1.3 of the FSAR.

4. The course description files for three of the training courses conducted were reviewed and compared to the description given in Appendix 13B of the FSAR.

<u>Course Designation</u>	<u>13B Designation</u>	<u>Course Description</u>
CR-2	E	PWR Technology; Babcock and Wilcox, 11/13-12/22/72
CR-7	D	Observation Training, 9/18-11/10/72
CR-10	B	Basic Academic Training 4/3-8/18/72

No significant deficiencies were noted when comparing the course content with the outline contained in Appendix 13B to the FSAR.

5. Sections 2.2 and 2.3 of Appendix 13A to the FSAR give the general qualifications of augmenting personnel to be utilized by Toledo Edison Company during the preoperation testing and start-up phases of operations.

These personnel have been identified except for the Site Operations Engineer. The inspectors reviewed the background qualifications of the identified individuals relative to the qualifications stipulated in Appendix 13A. No deficiencies were noted. The personnel covered by this review were as follows:

<u>Company</u>	<u>Title</u>	<u>Individual</u>
Babcock & Wilcox	Site Operations Manager	B. Day
Babcock & Wilcox	Test Program Manager	E. Michaud
Bechtel Company	Supervising Start-up Engineer	M. Parenteau
Bechtel Company	Start-up Engineer	R. Burdick
Bechtel Company	Start-up Engineer	G. Rhodes
Bechtel Company	Start-up Engineer	D. Brimmer

6. The status of the preoperational test program was reviewed. As of the present time, the licensee has identified 216 preoperational and acceptance tests. They define a "preoperational test" as a test on a system which is "nuclear safety related." The procedures for and the results of such tests undergo review by the Station Review Board. "Acceptance" test procedures and results are forwarded directly to the Station Superintendent for approval. As of this inspection, only a portion of one test has been performed.

Scheduling of the test program has concentrated, as of this time, on the test schedule up to the cold hydrostatic test of the RCS. Because systems are not being turned over to the operating staff at the times originally anticipated, the existing schedule is out of date. At the present time, the licensee is undergoing a detailed analysis of the construction schedule. This analysis should be completed in December 1974. At that time, a revised testing schedule will be generated using the revised system turn-over schedule. The licensee has agreed to provide a copy of this revised test schedule to the principal inspector for his use and review.

The inspectors reviewed the partially completed test procedure mentioned above and provided oral comments to the licensee on the way in which the procedure was being implemented. The licensee noted the comments.

7. Classification of Procedures

Administrative Procedure 1801.00 defines Preoperational Tests as being nuclear safety related and Acceptance Tests as being required for nonnuclear safety related matters. Review of the licensee's computer printout of required tests indicate many procedures for systems considered by the inspector to be safety related were not so classified. Examples were: pressurizer level verification, in core monitoring, maintenance of snubbers, and all periodic testing. Several procedures such as those for system cleaning and for chemistry were not classified. The licensee indicated the listing apparently had many errors and would be reviewed. The responsibility for classification was stated to be performed by one or two staff members and was subsequently reviewed by the Station Review Board. The inspector stated that unless changed the above matter could result in the SRB not reviewing procedures, including temporary procedure changes, required by the proposed Technical Specifications and minimizing the quality assurance group involvement in safety related matters. The inspector stated the licensee's resolution would be reviewed at a later date.