

POOR ORIGINAL

SEP 16 1975

50-346

Mr D. Thornburg, Chief, Field Coordination
and Enforcement Branch, IE

THRU: J. H. Sniezek, Chief, Light Water Reactor
Programs Branch, IE

TOLEDO EDISON RESPONSE TO HQ NOTICE OF VIOLATION REGARDING
DAVIS-BESSE

REFERENCE: LETTER, J. P. WILLIAMSON, TECO, TO J. G. DAVIS, IE:HO,
DATED AUGUST 25, 1975

The subject response was reviewed as requested (AI No. HO 0912 H1).
We consider the Toledo Edison reply to the NRC letter of 8-1-75
transmitting a notice of violation regarding construction activities
at the Davis-Besse Nuclear Power Station to be adequate. The reply
is responsive to identified concerns and discusses the significant
aspects of this matter.

It should be noted that the above comments pertain to the commit-
ments made by Toledo Edison and not to the execution of these
commitments which need be verified by Region III.

Handwritten: R. A. Rohrbacher
R. A. Rohrbacher
Senior Reactor Inspection
Specialist
Light Water Reactor Programs
Branch, IE

cc: J. G. Keppler, IE:III

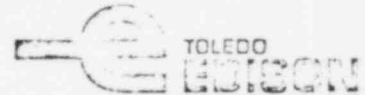
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JOHN P. WILLIAMSON
President
14191 259-5225

August 25, 1975

Docket No. 50-346
License No. CPPR-80

United States
Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. John G. Davis, Deputy Director
for Field Operations
Office of Inspection and Enforcement

Gentlemen:

This is in reply to your August 1, 1975 letter transmitting a Notice of Violation regarding construction activities at the Davis-Besse Nuclear Power Station.

The Notice of Violation resulted from inspection findings by representatives of the Region III Office during their May 19-22, 1975 site inspection of safety related electrical wiring and raceways. The enclosure to this letter contains specific responses to the infractions contained in your Notice of Violation.

I am concerned that our own quality assurance program, as well as those of Bechtel and our other contractors, permitted conditions to exist that allowed these findings to be made. I am confident, however, that the actions taken by myself and the responsible individuals under me have corrected any shortcomings and have strengthened all aspects of our quality assurance program.

I fully concurred with and supported the prompt commitments by Mr. Roe for a thorough inspection of the installed safety related cable, wiring and raceway systems. This inspection program has been carried out in an expeditious and professional manner. Completion of this inspection and correction of all discrepancies found will provide complete assurance that this cable and wiring system is correctly installed with proper documentation.

I am requiring frequent reporting to me of the status of safety related activities and have directed additional effort be given to the quality

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assurance efforts of the Davis-Besse project. As a result of this, the following actions have been taken:

Additional personnel have been assigned to the Toledo Edison Quality Assurance Department to provide increased field surveillance and audit of site activities.

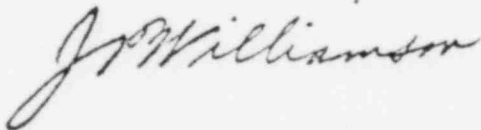
A special inspection of piping and mechanical systems was initiated and has been essentially completed to provide assurance that this area of site activities is in conformance with requirements.

The Bechtel Quality Control group which, at our insistence, was set up to operate dependently of their other site activities has been strengthened and is providing closer surveillance over contractor and construction management activities.

Where additional instructions have been shown to be desired, to strengthen quality related activities, they have been prepared and are in force.

With these actions outlined, together with others that have been taken, I am confident that our quality assurance program and activities are properly implemented and will be adequately maintained for this project.

Yours very truly,



JPW/plp
Enclosure

Copy: Mr. James G. Keppler
Regional Director
Region III

August 25, 1975

Response to
Notice of Violation
Dated August 1, 1975

Infraction No. 1

The requirements to meet the design bases for separation of redundant essential cables was properly provided in the necessary design documents and drawings. Criteria to meet the design bases for separation of essential from nonessential cables and wire, however, was not detailed and specific enough to provide assurance that the design bases could be met.

This detailed, specific criteria has since been fully developed and has been used by the inspection team as a part of their inspection documents. This criteria has also been reflected in the necessary documents used by the contractors in performance of the work.

Electrical standards and drawings have been revised to provide the required details for seismic support of conduits carrying Class IE circuits. These standards and drawings are being used for installation of these supports for ongoing work. An engineering team has been formed on site to review and evaluate all previously installed supports for conduit carrying Class IE circuits. As a result of this review and evaluation, each existing support will be certified as acceptable or will be modified to meet acceptable criteria. This effort is expected to be completed by February 1, 1976.

Infraction No. 2

The inspection procedures being used for the special inspection program of the installed Class IE cable, wiring and raceway system include inspection of cable jacket and conductor insulation for damage, inspection of the raceway system for sharp edges and inspection of the raceway system for debris. This special inspection is about 75 percent complete. All cases of cable jacket damage found had been previously documented for proper dispositioning. Some conductor insulation damage has been found that was not documented and these items are being properly dispositioned. All areas of the raceway system, where sharp edges were found to exist, have been properly protected. Debris found in the raceway has been removed.

Added emphasis has been given to all field personnel to follow established procedures. The contractor quality control inspection effort has been increased and the quality control inspection by Bechtel QC has been increased. Additional inspection procedures are being prepared by the contractor and completion and approval of these procedures is expected by August 29, 1975.

Infraction No. 3

The special inspection program has completed inspection of 1150 Class IE circuits to date. There have been some discrepancies found in routing of these circuits that were not documented, but none of this violated separation criteria for redundant channels. All discrepancies found have been promptly documented for proper dispositioning.

The importance of following exactly, the circuit and raceway cards have been re-emphasized to all contractor personnel. A review of the contractor procedures has shown the desirability of revisions to preclude improper routing and these procedures are being revised with approval expected by August 29, 1975.

Added contractor and Bechtel QC surveillance of cable installation has been instituted.

Infraction No. 4

Procedural changes have been made to the Davis-Besse Field Inspection Manual to provide positive requirements for expeditious processing of contractor nonconformance reports (NCR's). As a result, new Field Engineering Instructions and new Field Quality Control Instructions have been written, approved, and implemented. The backlog of outstanding NCR's has been significantly reduced by the revised, streamlined process. Additionally, other detailed instructions for tracking NCR's are being developed by the Bechtel Field QC organization to assure that contractor NCR's are processed within the procedural requirements and as expeditiously as possible. A periodic status report will be required. The expected completion date for these procedures is September 1, 1975. Full compliance is expected to be attained by September 15, 1975.

General

Toledo Edison project engineering and quality assurance personnel have and are continuing to be involved in the special inspection program including formalization of inspection criteria and procedures, together with evaluation and dispositioning of inspection results. Close review and approval of new and/or revised procedures and engineering design details is being exercised.