

September 8, 1980

Docket No. 50-346

License No. NPF-3

Serial No. 1-163



RICHARD P. CROUSE  
Vice President  
Nuclear  
(419) 259-5221

80-24  
Mr. A. B. Davis, Chief  
Fuel Facility and Material Safety Branch  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Davis:

Toledo Edison acknowledges receipt of your August 20, 1980 letter and Enclosure 80-24 (Log 1-410), referencing deviations from Davis-Besse Nuclear Power Station, Unit 1 commitments to the NRC listed as deficiencies under the heading of Notice of Violation.

A reply to each item of non-compliance is provided below:

Deficiency: Section 2.1.1 of the Appendix B Environmental Technical Specifications requires, in part, that "The maximum discharge temperature for Station liquid effluents shall not exceed 20°F above ambient lake water temperature."

Contrary to the above, the 20°F ΔT limit was exceeded on January 6, 7, 8, 16, and February 20, 1980.

Response: 1. On January 6, 7 and 8, ΔT returned to within the 20°F limit when the circulating water system was shifted from bypass to through the cooling tower.

On January 16, the service water discharge was diverted from the forebay to the collection box to reduce the Station discharge ΔT to within the 20°F limit.

On February 10, dilution pump was verified on, and the ΔT returned to within the 20°F limit when cooling tower blowdown was reduced.

2. SP 1104.09, Circulation Water System and Cooling Tower Operation Procedure was modified by M-3660 to provide additional guidelines for controlling discharge temperature differential.

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3. Major Modification M-3660 was incorporated into Revision 6 of SP 1104.09 on March 7, 1980 and should prevent any recurrence of this condition.

Deficiency: Section 5.4.2 of the Appendix B Environmental Technical Specifications requires, in part, that "A report shall be submitted in the event that a limiting condition for operation is exceeded (as specified in Section 2, "Limiting Conditions for Operation")..." Section 2.1.1 of the Appendix B Environmental Technical Specifications states "The maximum discharge temperature for station liquid effluents shall not exceed 20°F above ambient lake water temperature."

Contrary to the above, although the 20°F  $\Delta T$  limit was exceeded on February 20, 1980, ( $\Delta T=20.62^{\circ}\text{F}$  at 0100,  $\Delta T=22.09^{\circ}\text{F}$  at 0200,  $\Delta T=20.01^{\circ}\text{F}$  at 0300, and  $\Delta T=20.54^{\circ}\text{F}$  at 0800), no report was submitted.

- Response:
1. Review of the Station's records indicate that the 20°F limit was not exceeded on February 20, 1980, as indicated in Items 1 and 2. Further review did show however that the 20°F limit was exceeded on February 10, 1980. This investigation indicated that the discharge temperature was logged by the Reactor Operator as being in excess of the limit and that no Deviation Report (D.V.R.) was submitted. Revision 1 to LER NP-09-80-01 was submitted to include the February 10, 1980 occurrence.
  2. As corrective action:
    - a. The Operators were reminded of their responsibility for submitting DVR's when conditions are in excess of Technical Specification limits.
    - b. Personnel involved in the review of the Daily Logs were advised of the occurrence and were reminded of their responsibility for thorough reviews of the logs.

A letter was submitted to the Director of Nuclear Reactor Regulation on June 13, 1980, requesting that the subject Environmental Technical Specification, Section 2.1 of Appendix B, be eliminated.

3. The station is now in full compliance regarding this item.

Deficiency: Section 2.3.3 of the Appendix B Environmental Technical Specifications requires, in part, that "The concentration of sulfate ion shall be determined once per week from a grab sample collected at the beach sampling station during the discharge of the neutralizing tank. If there is no discharge from the neutralizing tank, sampling shall be once per week." Section 1.0 of the Appendix B Environmental Technical Specifications defines a

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week as "At least once every seven days with a maximum allowable extension of 25%."

Contrary to the above, no sulfate monitoring was performed between February 12, 1979 and February 23, 1979, a period of time longer than seven days plus 25%.

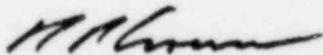
- Response:
1. The once per week sample was inadvertently missed when a sample was collected on Monday of one week and on Friday of the following week. Individuals responsible for collecting the samples were instructed regarding the definition of weekly as it applies to the Environmental Technical Specifications.
  2. In order to avoid further noncompliance a computerized program was written so that tests scheduled for the week are printed out to show when they are to be performed.
  3. Full compliance for having the computerized schedule operating was in December 1979. A letter was submitted to the Director of Nuclear Reactor Regulation on June 13, 1980, requesting that the subject Environmental Technical Specification, Section 2.3 of Appendix B, be eliminated.

Deficiency: Section 3.1.2.a.4 of the Appendix B Environmental Technical Specification requires, in part, the "Ichthyoplankton samples shall be taken once every ten days during the anticipated spawning season, April through August," and "Duplicate samples surface and bottom shall be collected in the vicinity of...the Toussaint Reef. Samples at the Toussaint Reef shall be collected only during the anticipated spawning season."

Contrary to the above, no sampling was conducted at the Toussaint Reef between June 1, 1980, and June 30, 1980, a period of time in excess of ten days.

Response: No reply is required as stated in the NRC cover letter for Report No. 80-24. However, the date reported in the deficiency should have been 1979 rather than 1980.

Very truly yours,



TPC/TDM/DWB/daw

cc: NRC D-B Resident Inspector