



Docket No. 50-346

License No. NPF-3

Serial No. 1-207

May 24, 1981

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

Mr. R. F. Heishman, Acting Director
Division of Resident and Project Inspection
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Heishman:

Toledo Edison acknowledges receipt of your April 29, 1981 letter and enclosures, Appendix A, and Inspection Report 50-346/81-04, referencing violations to Technical Specifications 4.6.1.7 and 6.8.1. These violations are listed as "Severity Level XI Violations (Supplement I)" in Appendix A.

Following examination of the items of concern, Toledo Edison herein offers information regarding the items.

Violation # 1: Technical Specification 4.6.1.7 requires that the accumulated time any containment purge supply and/or exhaust valve is open and provides access to the outside atmosphere shall be determined at least once per 24 hours.

Contrary to the above, the containment purge accumulated time was not determined between the dates of March 7 through 9, 1981.

- Response # 1:
- (1) When notified of the discrepancy, the Operator completed the "accumulated time" calculation and made the appropriate log entries which resolved the discrepancy pertinent to this Notice of Violation.
 - (2) The procedure used to satisfy this requirement, ST 5099.02, will be modified to limit information to only that which is needed for satisfying Technical Specifications. Also, Operators will receive written reinforcement of the necessity for daily compliance.
 - (3) The Station will be in full compliance not later than June 1, 1981.

THE TOLEDO EDISON COMPANY EDISON PLAZA 300 MADISON AVENUE TOLEDO, OHIO 43652

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Violation # 2: Technical Specification 6.8.1 requires that procedures recommended in Appendix A of Regulatory Guide 1.33, November, 1972, shall be implemented.

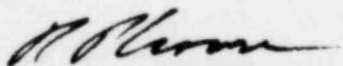
Appendix A of Regulatory Guide 1.33, November, 1972, includes Administrative Procedures.

Section 4.1.10 of Administrative Procedure AD 1844.00, "Maintenance" requires that: "Initial trouble shooting of equipment/component for purposes of identifying equipment/component problems can be done without an MWO if Maintenance/I&C personnel work with Operations Department under the cognizance of the Shift Supervisor."

Contrary to the above, on March 18, 1981, maintenance personnel removed inspection covers and initiated action to take resistance readings on Emergency Diesel Generator 1-2 without notification to the Shift Supervisor.

- Response # 2:
- (1) The activity was commenced in relationship with problems with Emergency Diesel Generator 1-1. The resistance readings were desired for comparison only, and the work in no way affected the operability of ED/G 1-2, therefore, it was the opinion of the responsible Maintenance Supervisor that notification to the Operations Department was not necessary. The discrepancy was identified when Operations personnel arrived to perform an operability test on ED/G 1-2. The Shift Supervisor was then notified. Maintenance personnel completed taking resistance readings, under the cognizance of the Assistant Shift Supervisor, and then replaced the inspection cover.
 - (2) A Deviation Report (81-037) was written to document the event, and the corrective action. The problem originated from an error in judgment by the Maintenance Supervisor. The Maintenance Supervisor is fully aware of the consequences of his actions, and will notify the Operations Department whenever it is necessary to monitor any safety related equipment.
 - (3) The Station is considered to be in full compliance as of this date.

Yours very truly,

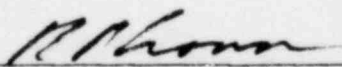


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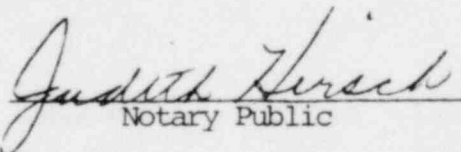
cc: NRC DB-1 Resident Inspector

ATOMIC ENERGY ACT OF 1954
SECTION 182
SUBMITTAL IN RESPONSE
FOR
DAVIS-BESSE NUCLEAR POWER STATION
UNIT 1
FACILITY OPERATING LICENSE NO. NPF-3

This letter is submitted in conformance with Atomic Energy Act of 1954, Section 182 relating to Mr. R. F. Heishman's letter of April 29, 1981 (Log No. 1-505).


Vice President, Nuclear

Sworn to and subscribed before me this 24th day of May, 1981.


Notary Public

JUDITH HIRSCH
Notary Public, Wood County, Ohio
My Commission Expires June 30, 1982