

Docket No. 50-346

License No. NPF-3

Serial No. 1-357

May 13, 1983



RICHARD P. CROUSE
Vice President
Nuclear
(419) 253-5221

Mr. C. E. Norelius, Director
Division of Engineering and Technical Programs
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Norelius:

Toledo Edison acknowledges receipt of your April 27, 1983 letter (Log No. 1-777, Inspection Report No. 50-346/83-04), referencing one violation for the Davis-Besse Nuclear Power Station, Unit No. 1.

Following an examination of this item, Toledo Edison herein offers information regarding the item of violation.

Violation: 10 CFR 50, Appendix B, Criterion V, states in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, . . . , of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, . . ."

Davis-Besse Administrative Procedure AD 1828.03.6 - General Employee Training - states: "Experienced personnel may be exempted from receiving specific instruction in General Orientation and/or Radiological Controls Training. Successful completion of an examination may be required for each program for which an exemption is requested prior to approval of the exemption. A Personnel Training WAIVER Form . . . must be submitted to Nuclear Training for each individual Toledo Edison management person requests this exemption for."

Contrary to the above, waivers had not been prepared, and examination had not been given for two individuals who did not attend required annual requalification in Radiological Controls Training.

MAY 20 1983

8306070166 830601
PDR ADOCK 05000346
Q PDR

Response:

Toledo Edison has adopted the policy of waiving Radiological Controls Training for all Chemistry & Health Physics personnel qualified as Testers, as well as for all experienced Chemistry & Health Physics management personnel. The rationale for this waiver is that these personnel, by nature of their job requirements, are those who establish and enforce the requirements disseminated at these training sessions.

Performance of normal job functions also exposes these personnel to the information required by 10 CFR 19.12, and attendance at the Radiological Controls Training sessions is, therefore, considered unnecessary.

To document waiving the subject training for each qualified individual within the Chemistry & Health Physics Department, a waiver was written for each individual. Each waiver stated "Annual requalification requirements for "Radiation Controls Training" can be waived for Chemistry & Health Physics management personnel, and bargaining unit personnel who are Chemical and Radiation Testers or above . . .".

These waivers were written with the intention that they permanently waive requalification requirements for these named individuals so long as they remained within the Chemistry & Health Physics Department. AD 1828.03 provided no restrictions for durations of waivers.

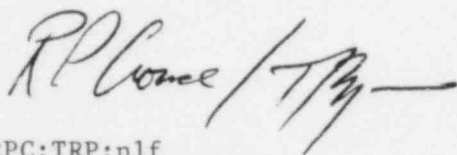
Although copies of these waivers were shown to the NRC inspector during his visit, the inspector decided that AD 1828.03.6 implied a one-to-one relationship between an annual training requirement and the waivers. No such requirements were written in the procedure nor were any deemed appropriate at the time.

Toledo Edison does recognize that weaknesses exist in the manner in which permanent waivers have been written and in providing assurances that training requirements are met when personnel change jobs from ones for which training waivers exist to ones which require a specific training activity. Modifications were made to AD 1828.03.6 to

Docket No. 50-346
License No. NPF-3
Serial No. 1-357
May 13, 1983
Page 3

strengthen this process based on comments made by the NRC inspector and the Nuclear Training Department. Chemistry & Health Physics Department personnel waivers were rewritten reflecting the new requirement for annual submittal of training waivers. Toledo Edison feels that this activity was done to improve a management control function that was already in compliance with existing procedures and requirements.

Very truly yours,

A handwritten signature in cursive script, appearing to read "R. P. Conner" followed by a horizontal line.

RPC:TRP:nlf
cc: DB-1 NRC Resident Inspector