Docket No. 50-346

License No. NPF-3

Serial No. 1-232

November 27, 1981

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

Dear Mr. Spessard:

Toledo Edison acknowledges receipt of your October 28, 1981 letter (Log 1-562) and enclosures, Appendix A and report 50-346/81-16, referencing the violation of Technical Specification 6.8.1. This violation is listed as Severity Level IV (Supplement I) in Appendix A.

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

Violation: Technical Specification 6.8.1 requires that written procedures shall be implemented.

Administrative Procedure AD 1844.00, "Maintenance" requires that: "Upon completion of maintenance the responsible foreman will review and approve the Maintenance Work Order (MWO)...." "The responsible foreman will forward the MWO to the Shift Supervisor for any testing required..." and "The Shift Supervisor should then sign for testing completed within his responsibility area and forward the MWO to the Maintenance Engineer." The procedure also requires that: "the maintenance engineer shall sign, indicating that maintenance work authorized by the MWO was completed." The procedure further requires that: "the Shift Supervisor shall be responsible for assuring that the system or component on which maintenance is to be performed is properly tagged prior to the performance of the maintenance."

Contrary to the above:

a. Numerous Maintenance Work Orders for the Emergency Diesel Generator, Auxiliary Feedwater System, Core Flood System, Reactor Protection System, Makeup and Purification System, Reactor Coolant Pumps and Containment Ventilation System were not approved by the foreman and Shift Supervisor upon completion of the maintenance.

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- b. On September 4, 1981, the inspector found that the seismic supports in the SFRCS instrument lines were not painted or grouted. (MWO 77-424 was signed as completed on September 13, 1978. The work covered by this MWO included the installation of painted and grouted seismic supports on the Steam Feedwater Rupture Control System (SFRCS) instrument lines.)
- c. On September 30, 1981, maintenance personnel removed the reactor coolant drain tank rupture disk with no tagging conducted. An unplanned release resulted when water from an isolable line spilled on the floor.

## Response:

Item (a)

(1) Corrective action taken and results achieved. A comprehensive review of the Maintenance Work Order (MWO) System was conducted by senior members of the Station Staff. It was determined that the problem identified in item a of the Notice of Violation existed as described.

While the control of maintenance on specific MWOs was not in accordance with Administrative Procedure AD 1844.00, "Maintenance", the poor work practice which caused it, upon further investigation as to its consequence, did not directly impact the operability of those identified nuclear safety related systems.

Specifically, on all the mentioned MWOs, systems were not returned to service without the maintenance being physically completed, or without the required testing for operability being witnessed and documented. Signatures were withheld because of a number of administrative reasons, and without further attention, the MWOs continued to remain open, long after the equipment was returned to service.

It is appreciated by station management that this formerly accepted practice was indicative of not enough effort or appreciation being exhibited by personnel to complete the job administratively.

The Operations Staff had prepared a preliminary listing of MWOs which should have been closed out, and the Operations Engineer forwarded this review to the Maintenance Engineer via memorandum M81-1432 on August 6, 1981. The staff continued to address the circumstances and reason why various MWOs were not receiving prompt close-out. On September 15, 1981, the Maintenance Engineer met with his maintenance supervisors and foremen, representatives from Operations and various

> Quality Control personnel. The purpose was to resolve difficulties preventing proper maintenance documentation and discuss particular improvements. The minutes of this meeting were distributed and reviewed, and served to emphasize the need for increased communications between Maintenance, Operations, and Quality Assurance in order to resolve problems directly, and to reiterate the necessity for the paperwork documentation to remain current with the work progress.

> The Station Superintendent formalized this effort in memorandum M81-1745 on October 16, 1981 which demanded strict adherence to the requirements of current administrative procedures. Prior groundwork and the rigid enforcement of this policy has abruptly stopped such informal practices. Presently systems are not returned to service without the paperwork being completed. However, a backlog of MWOs requiring closeout, which originated from past practices, remains to be corrected.

(2) Corrective action to be taken to avoid further noncompliance. To strengthen management and administrative controls in the future, Toledo Edison is restructuring the Station Maintenance Department to include a Maintenance Planning Group. The personnel for this group have been budgeted for fiscal year 1982. The outset of this group is presently being filled with two contractor personnel until an experienced planner and technician can be hired. A clerk will also be added to this group in 1982, with a student engineer presently providing temporary assistance. The immediate responsibility of the group will be to clean up the backlog of MWOs requiring close out.

The interim group will quantify the number of MWOs that have not been closed out, and provide the Station Superintendent with periodic progress reports until the backlog is eliminated.

Various MWOs were held up due to quality control related reasons. The Quality Assurance Director has committed to the Station Superintendent adequate resources to work full time with the Station in closing our MWOs in order to meet the compliance deadline.

It is anticipated that the proper maintenance planning to be provided by the new Planning Group will eliminate the need for the expedient practices that have developed previously. Concurrently, as you are well aware, Toledo Edison has strived to steadily increase the size of the Station's Staff in order to reduce workloads and present a less hectic and demanding work environment. For fiscal year 1982 this includes an increase in the Maintenance Staff of two management and ten bargaining unit personnel. Additional personnel will permit more attention to detail, including an improved administrative effort.

> In the long term Toledo Edison has invested considerable expense and effort towards the development of a computerized Maintenance Management System, which is to be fully operational by February 1983. This system is designed to provide better management controls and lessen the paperwork burden. The successful implementation of this program concurrent with the other organizational and administrative changes previously described should constructively strengthen Toledo Edison's ability to appropriately control and document the quality of maintenance on nuclear safety related systems.

The Station Superintendent furthermore, has requested QA to provide a periodic audit of the Maintenance Work Order System in order to ensure such poor work practices do not re-develop in the future, and to appraise upper management of any current problems which may require correction.

(3) The date when full compliance is achieved. The station is presently in compliance of not returning systems to service without the appropriate documentation completed. The station will be in full compliance of eliminating the backlog of MWOs that are overdue for close-out by March, 1982.

Item (b)

- Corrective action taken and results achieved. The seismic supports in the SFRCS instrument lines were grouted under MWO 81-3348. The supports will be painted under MWO 81-4043 during the scheduled refueling outage starting February 26, 1982.
- (2) Corrective action to be taken to avoid further noncompliance. The seismic supports were installed in 1978 by the Station's maintenance contractor. Toledo Edison has made considerable management changes within the company since that time in order to effectively control the cost, the planning, and the quality of the construction effort. The Nuclear Engineering and Construction Division was formed with a Nuclear Construction Manager to direct and coordinate all activities involving construction at Davis-Besse Nuclear Power Station. This group has pursued the development of extensive construction procedures to technically and administratively interface with the Station's procedures governing the quality of changes to nuclear safety related facilites. The formation of the Station's Outage Planning Group headed by an Assistant Station Superintendent was specifically formulated to exercise further experienced control over construction activities in an operational plant. Toledo Edison feels that these major organizational changes contain the structure and methods required to prevent such similar occurrences by maintenance contractors in the future.

> (3) The date when full compliance will be achieved. The station is presently in full compliance, as the painting of the seismic support has no impact on nuclear safety.

Item (c)

(1) Corrective action taken and results achieved. The Station Superintendent personally investigated the details of the events which lead to the unplanned release and discussed the lessons learned with his staff. His notes regarding the September 30, 1981 event were reviewed by the Station Review Board (SRB) as part of Deviation Report 81-146, "Clean Liquid Radwaste System" on October 23, 1981 (SRB Meeting Minutes No. 1042). The event was reviewed by the Company Nuclear Review Board (CNRB) on October 28, 1981 (CNRB Minutes No. 91).

On October 2, 1981 the Operations Supervisor published a memorandum M81-1743 to the station management staff correcting the informal practice of Shift Supervisors giving permission to commence work preparations with the verbal understanding that Maintenance would later submit a tagging list before actual work was conducted. Confusion about what permission was given for commencement of work directly resulted in the removal of the reactor coolant drain tank rupture disk without isolation tagging being conducted.

Strict enforcement of this policy in accordance with AD 1844.00 "Maintenance" has effectively corrected this informal practice.

- (2) Corrective action to be taken to avoid further noncompliance. The management and administrative controls as well as the periodic audit of the Maintenance Work Order system by QA, described under Item (2) Section (2) of this response, will prevent recurrence of this and other informal practices in the future.
- (3) The date when full compliance is achieved. The station is presently in full compliance of not permitting work to commence without the appropriate tagging being completed.

Yours very truly,

nrham

RPC/TDM/PNC/SMQ/daw cc: NRC DB-1 Resident Inspector

ATOMIC ENERGY ACT OF 1954 SECTION 182 SUBMITTAL IN RESPONSE FOR THE DAVIS-BESSE NUCLEAR POWER STATION UNIT 1 FACILITY OPERATING LICENSE NPF-3

This response is submitted in conformance with Atomic Energy Act of 1954, Section 182 relating to Mr. R. L. Spessard's letter of October 28, 1981. This deals with routine safety inspection (81-16) conducted by Messrs. L. A. Reyes and W. G. Rogers

By

Vice-President, Nuclear

Sworn to and subscribed before me this November, 1981.

à day of

11 Notary Public

LAURIE A. BRUDZINSKI Motary Public, State of Ohio My Commission Expires May 16, 1906