

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-346/82-05(DRPI)

Docket No. 50-346

License No. NPF-3

Licensee: Toledo Edison Company
Edison Plaza, 300 Madison Avenue
Toledo, OH 43652

Facility Name: Davis-Besse 1

Management Meeting At: Region III Office
Glen Ellyn, IL

Prepared By: *D. R. Hunter for*
L. A. Reyes

2/23/82

Approved By: *D. R. Hunter*
D. R. Hunter, Chief
Reactor Projects Section 2B

2/23/82

Meeting Summary

Meeting on January 21, 1982 (Report No. 50-346/82-05(DRPI))

Scope of Meeting: A special, announced meeting was held with corporate and site management to discuss licensee corrective actions relating to Region III concerns in the areas of Drawing Control, Nonconformance Reports, Personnel Errors, and non-Technical Specification items having safety significance. The meeting lasted approximately two hours and six Region III personnel attended.

DETAILS

1. Attendees

Toledo Edison Company

R. P. Crouse, Vice President Nuclear
T. D. Murray, Station Superintendent
C. T. Daft, QA Director
J. H. Shortt, Director, Nuclear Engineering and Construction
J. Helle, Manager Facility Engineering

Nuclear Regulatory Commission

R. L. Spessard, Director, Division of Resident and Project Inspection
J. F. Streeter, Chief, Reactor Projects Branch 2
D. R. Hunter, Chief, Projects Section 2B
L. A. Reyes, Senior Resident Inspector
W. G. Rogers, Resident Inspector
L. G. McGregor, Project Inspector

2. Background

This meeting was requested by Region III to discuss concerns in the areas of drawing control, nonconformance reports, and personnel errors. The licensee was requested to address corrective actions related to these areas of concern.

3. Introduction

Mr. Spessard summarized the areas of concern.

4. Corrective Actions

Mr. Crouse summarized licensee corrective actions as follows:

a. Drawing Control

As identified in Audit No. 755, conducted in April - June 1981, several areas of the drawing control program needed additional management attention.

(1) Drawing Receipt Acknowledgement

Facility Engineering is revising instructions for drawing distribution to provide for the use of an acknowledgement form. This form will ensure that the recipient of a drawing notes that the drawing have been included in the recipient's set of drawings.

(2) Drawing Revision

By March 1, 1982, Facility Engineering will distribute a copy of the Bechtel Drawing List to the Station and Nuclear Engineering groups. This list will also include the status of the Document Change Notices (DCNs) and Vendor Document Change Notices (VDCNs). Initial efforts in this area will be directed at Facility Changes that have been implemented but not closed out.

A copy of the Bechtel Drawing List will be made available to the Control Room by March 1, 1982, so that operators can verify that their drawings reflect the as-built status of plant systems. Once the Bechtel Drawing List is made available to the station the control copy drawings will be updated. The Control Room copy will be given first priority for the update.

To correct a problem concerning discrepancies between drawings and system configurations subsequent to a facility change activity, the licensee has revised the requirements of Administration Procedure AD 1844.00, "Maintenance," and Procedure AD 1845.00, "Changes, Tests, and Experiments." The revised procedures require that the applicable DCNs are attached to the appropriate station drawings prior to declaring the equipment operable.

(3) Long-Term Goals

Facility Engineering has begun a two year program to assume the responsibilities of drawing control activities that are currently under the control of the architect engineering firm.

b. Nonconformance Reports

The licensee presented the following status of outstanding Nonconformance Reports:

<u>Year</u>	<u>Outstanding Nonconformance Reports</u>
1979	112
1980	108
1981	118

Region III personnel expressed concern about the number of Nonconformance Reports outstanding, especially those reports on equipment that had been declared operable. The outstanding Nonconformance Reports on operable equipment were being used for tracking purposes and this practice appears to have created a psychological problem for certain station personnel in that the Nonconformance Report implies the system is being operated with an outstanding deficiency associated with the operable equipment.

A review of the outstanding nonconformance reports indicated that changes to safety-related equipment were being conducted using a Maintenance Work Order (MWO) without the appropriate engineering review and management approvals or approved maintenance procedures.

The licensee agreed to research the extent of the problem and to discuss the findings with the Resident Inspectors.

c. Personnel Errors

Region III personnel expressed concern about the number of personnel errors attributed to construction workers. Of the 79 LERs during 1981, 17 were caused by personnel errors. Of those 17, 9 were caused by construction workers.

The licensee presented the following actions taken to improve the management control regarding the construction workers:

- (1) The TECo Construction Superintendent was replaced by the Lead Maintenance Engineer in December 1981 to provide a manager of construction activities who has experience at an operating nuclear power station.
- (2) Administrative procedures for the Nuclear Construction Department have been prepared and training of the construction contractor supervisors concerning the procedures were being conducted.
- (3) The Station Superintendent held a meeting with the construction supervisors to review the requirements for fire barriers. The construction supervisors were instructed to review these requirements with their respective foremen.
- (4) The General Orientation Training offered to improve in the areas of fire barriers and negative pressure boundary doors, was currently under review.
- (5) The number of supervisors in the field was being increased.

Region III personnel indicated that it may be necessary to increase the number of independent inspections to identify the problems with the fire barriers and negative pressure doors during construction activities.

5. Summary

Mr. Hunter summarized the results of the meeting including the following:

The Bechtel Drawing List will be distributed by March 1, 1982, and a copy will be made available to the control room. First priority

for the distribution and audit of drawings for control copy holders will be given to the copies used by the facility operating staff in order to allow adequate response to routine and unplanned plant activities.

- . The licensee will review the list of outstanding Nonconformances Reports to assure that the capability of equipment is not affected. The review will also determine if the work should have been performed under the Facility Change Request procedure.
- . The General Orientation Training will be reviewed and additional guidance provided in the area of fire barriers and negative pressure boundary doors. The licensee will continue efforts on development of training regarding maintenance procedures. The licensee will investigate the use of hold points for maintenance activities if the training measures are not successful.

Additionally, Mr. Hunter indicated that the Station Staff should be made aware that areas not specifically addressed by the Technical Specifications can have safety significance and problems in these areas should be brought to the attention of upper levels of management. Identification of problem areas to the appropriate levels of management can be performed effectively by the use of the existing system of deviation reports.