



Docket No. 50-346

License No. NPF-3

Serial No. 1-266

May 3, 1982

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

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 April 8, 1982 letter (Log 1-612) and enclosures and report 50-346/82-02-01, referencing the violation of Technical Specification 4.0.5. This violation is listed as Severity Level IV (Supplement I).

Violation: Technical Specification 4.0.5 requires Inservice Testing of ASME Code Class 1, 2, and 3 components be conducted as per the requirements of Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. Section XI, Article IWV-3410(b)(1) of the ASME Boiler and Pressure Vessel Code requires exercising valves to the position required to fulfill their function at least at quarterly intervals or the next cold shutdown for inaccessible valves.

Contrary to the above, containment isolation check valves CV 124, CV 125, SA 502, IA 501, and NN 58 which had been last tested August 12, 1981, were not exercised during the cold shutdown on November 16-30, 1981.

Response: (1) Corrective action taken and results achieved:

Following a similar occurrence on August 20, 1981, a major modification to Surveillance Test ST 5099.08, Miscellaneous Valves Quarterly Test was written and reviewed by the Station Review Board in a timely manner. The major modification was delayed during the typing and proofing stage and, therefore, had not been distributed for use. This led to the second

8206210368 820615  
PDR ADDOCK 05000346  
G PDR

MAY 10 1982

Docket No. 50-346  
License No. NPF-3  
Serial No. 1-266  
Page 2

occurrence of a missed test on December 15, 1981. The new revision to procedure ST 5099.08, which incorporated the major modification that grouped the five valves into one section, received final approval and was distributed for use on December 22, 1981. The surveillance testing computer schedule was also changed to incorporate the new section. A modification was made to the Startup Checklist Procedure PP 1102.01 to reference this new section of ST 5099.08 in the Mode 4 Startup Checklist.

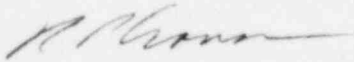
(2) Corrective action to be taken to avoid further non-compliance

The delay in issuing the new revision of ST 5099.08 was the cause of the second occurrence. This delay is not typical and can be traced to a lack of prioritizing rather than a procedure methods problem. The individual responsible for maintaining priority and minimizing delays in the revision process of this procedure did not remain cognizant of the major modification status or expedite its processing. This lack of cognizance has been discussed with the responsible individual, emphasizing the consequences.

(3) The date when full compliance is achieved.

Full compliance was achieved when the major modification to ST 5099.08 was incorporated, and the new revision of this procedure was distributed for use on December 22, 1981.

Very truly yours,



RPC:JRL:ECC:ljk

Attachment

cc: DB-1 NRC Resident Inspector