



Docket No. 50-346

License No. NPF-3

Serial No. 831

June 30, 1982

RICHARD P. CROUSE

Vice President  
Nuclear

(419) 259-5221

A82-470B

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Eisenhut:

Generic Letter 82-10, dated May 5, 1982 (Log No. 981) requested information regarding completion dates and schedules on selected NUREG-0737 TMI-related items. The information as it relates to the Toledo Edison Company and the Davis-Besse nuclear Power Station Unit No. 1 is attached.

Certain of the items as noted in your letter are still under development and require no reply by Toledo Edison at this time. However, other specific items for which a reply is requested appear to be inconsistent with other recent NRC actions. These items are discussed below:

1. Item I.A.1.3.1 "Limit Overtime"

In Generic Letter 82-10, this item is discussed as if it is on-going with completion due by October 1, 1982. The references given for this item are Generic Letter 82-02, which proposes changes to NUREG-0737 and Regulatory Guide 1.33, and SECY-81-440.

NRC Inspection Report 81-10, dated June 19, 1981 (Log No. 1-519) identified this item as acceptably completed for the Davis-Besse Nuclear Power Station. As a result of this report, Toledo Edison has considered this NUREG-0737 item as implemented, closed and NRC approved.

2. Items III.A.1.2 "Upgraded Emergency Support Facilities"  
III.A.2.2 "Meteorological Data"

Your generic letter appears to be in disagreement with the recent policy discussions in the June 14, 1982 meeting, where majority

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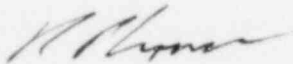
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approval of the Nuclear Regulatory Commission paper SECY-82-111 on the subject of Emergency Response Capabilities was given. In fact, Toledo Edison has modified its previous position on several items to be consistent with the subject SECY paper. These revised positions are reflected in the attachment.

3. Approach to Scheduling

SECY-82-111 recommends that certain NUREG-0737 items be better defined to the licensee followed by a plant specific schedule from the licensee which the NRC could use as a basis to ensure timely resolution. Generic Letter 82-10 does not appear to conform to the important policy features of allowing the flexibility of determining what specific actions and schedules are needed at each unique facility. Toledo Edison agrees with the approach of SECY-82-111, and would prefer to handle these issues in a manner consistent with that NRC document. Further discussions on this approach are encouraged in the near future.

Very truly yours,



RPC:LDY:lab  
attachment

cc: DB-1 NRC Resident Inspector

10 CFR 50.54(f)  
SUBMITTAL IN RESPONSE  
FOR  
DAVIS-BESSE NUCLEAR POWER STATION  
UNIT NO. 1  
FACILITY OPERATING LICENSE NO. NPF-3

This letter is submitted in conformance with 10 CFR 50.54(f) in response to Mr. Darrell G. Eisenhut's letter of May 5, 1982. This deals with Post-TMI Requirements (Generic Letter 82-10), Enclosure 1.

By *R. Brown*  
Vice President, Nuclear

Sworn to and subscribed before me this 30th day of June, 1982.

*Carol Lindhorst Brown*  
Notary Public

CAROL LINDHORST Notary Public  
State of Ohio  
My Commission Expires June 3, 1983

NUREG-0737 ITEMS LICENSEE RESPONSE

Item	Title	Description	NUREG-0737 Schedule	Toledo Edison Letters	Toledo Edison Schedule	Remarks
I.A.1.3.1	Limit Over- time	Revise administrative pro- cedures to limit overtime in accordance NUREG-0737.	11/1/80	12/30/80 #670	Completed	Toledo Edison has revised admin- istrative procedures to limit overtime. This item is considered closed by NRC Inspection Report 81-10 dated June 19, 1981 (Log No. 1-519).
I.A.1.3.2	Minimum Shift Crew	Augment current shift staff- ing to conform with minimum levels set forth on page 3-9 of NUREG-0737.	7/1/82	5/13/82 #817	Pending Operator Licensing Exams	Problems with meeting the schedule were identified in our letter of May 13, 1982 (Serial No. 817) efforts will continue as identified until compliance is achieved.
I.C.1	Revise Emer- gency Pro- cedures	Revise procedures by next refueling outage.	First Refuel- ing after 10/1/82	12/30/80 #670 7/9/81 #726	First Refueling after 10/1/82 after guideline approval (ATOG)	The Anticipated Transient Oper- ating Guidelines (ATOG) pro- gram was submitted generically by the B&W owner group and is cur- rently under staff review.

NUREG-0737 ITEMS LICENSEE RESPONSE

<u>Item</u>	<u>Title</u>	<u>Description</u>	<u>NUREG-0737 Schedule</u>	<u>Toledo Edison Letters</u>	<u>Toledo Edison Schedule</u>	<u>Remarks</u>
11.D.1.2	RV & SV Test Programs	Submit plant specific reports on relief and safety valve program.	4/1/82	7/1/81 #726 3/31/82 #800	See Remarks	Test results are under evaluation regarding plant specific valve performance. Toledo Edison is participating in the EPRI PWR safety and relief valve test program and supports the current PWR utilities schedule on this item. Next submittal is planned July 1, 1982.
11.D.1.3	Block Valve Test Program	Submit report of results of test program.	7/1/82		See Remarks	Toledo Edison is participating in the EPRI PWR Safety and Relief Valve Test program and supports the current PWR utilities schedule on this item. Toledo Edison plans a submittal on July 1, 1982.
11.K.3.30	SB LOCA Analysis	Submit plant specific analyses.	One year after staff approval of model	1/30/81 #684 11/24/81 #760	One year after staff approval of model	Extensive discussions between the NRC Staff and B&W Owners Analysis Subcommittee have established a proposed program.

NUREG-0737 ITEMS LICENSEE RESPONSE

Item	Title	Description	NUREG-0737 Schedule	Toledo Edison Letters	Toledo Edison Schedule	Remarks
II.K.3.31	Compliance with 10CFR50.46	Plant Specific Calculations	One year after staff approval of model	12/30/80 #670	One year after staff approval of model	Extensive discussions between the NRC Staff and B&W Owners Analysis Subcommittee have established a proposed program.
III.A.1.2	Staffing Levels for Emergency Situations	Provide for augmentation of staffing in accordance with Table B-1 NUREG 0654.	7/1/82	4/21/82 #1-261 6/23/82 #1-275 6/23/82 #828		Toledo Edison will meet the commitment of Table B-1 as identified in Revision 4 of the Emergency Plan. This has been accepted during the February 8-19, 1982 Site Inspection Review.
III.A.1.2	Upgrade Emergency Support Facilities	Complete modifications.  a. Technical Support Center (TSC) Operation Support Center (OSC) Emergency Operation Facility (EOF)	10/1/82	12/27/79 #571 4/3/80 #606 9/29/80 #653  5/27/81 #719	Completed	a. Center and facilities are operational.

NUREG-0737 ITEMS LICENSEE RESPONSE

Item	Title	Description	NUREG-0737 Schedule	Toledo Edison Letters	Toledo Edison Schedule	Remarks
		b. Safety Parameter Display System (SPDS)		5/27/81 #719	2nd Quarter of 1983	b. SPDS requirement will follow those recommended in SECY82-111. Documents of Section 2 of the NRC Staff recommendations on the requirements for emergency response capabilities will be used as guidance.
III.A.2.2	Meteoro-logical Data	Complete modifications.	10/1/82	6/30/81 #724	10/1/82	Toledo Edison will provide its meteorological data by its currently installed primary Meteorological Data System. A Class "A" Dose Prediction Model is being developed for operation by October 1, 1982. No on-site Secondary Meteorological Data Acquisition System will be installed.
III.B.3.4	Control Room Habitability	Modify facility as identified by licensee study.	Plan: Specific	5/28/81 #716 3/16/82 #796	Complete	As identified in our March 16, 1982 (Serial No. 798) submittal no facility modifications were identified or planned by licensee study.

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