

Docket No. 50-346

License No. NPF-3

Serial No. 1-282

July 27, 1982



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Mr. C. E. Norelius, Director
Division of Engineering & 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 March 26, 1982 letter (Log 1-603) and enclosures, Appendix, Notice of Violation and Report 50-346/82-07 (DETP), referencing various violations.

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

Violation: 10 CFR 50.59(a)(1) states in part that, "The holder of a license authorizing operation of a production or utilization facility may (ii) make changes in the procedures as described in the safety analysis report, without prior Commission approval, unless the proposed change involves a change in the technical specifications incorporated in the license or an unreviewed safety question."

10 CFR 50.59(b) states in part that "The licensee shall maintain records of changes in procedures made pursuant to this section, to the extent that such changes constitute changes in procedures as described in the safety analysis report. These records shall include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question."

Contrary to the above, the licensee did not conduct a safety evaluation to determine whether operation at rated conditions with a BWST temperature in excess of the 90°F temperature assumed in the safety analysis report constituted an unreviewed safety question.

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(1) Corrective Action & Results Achieved -

Response: Toledo Edison developed a safety evaluation (Facility Change Request 82-006, Revision A), which evaluated operation at rated power while the BWST was in excess of 90°F on January 13, and January 14, 1982. This was submitted in total to Region III on May 17, 1982 (Serial No. 1-268).

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

Response: BWST Operating Procedure SP 1104.66 and Miscellaneous Instrument Daily Check Procedure ST 5099.02 have been modified to insure BWST temperature does not exceed 90°F.

(3) The date when full compliance will be achieved -

Response: Full compliance was achieved March 9, 1982.

In addition, a discussion was requested about the actions planned to be taken to ensure that the proper levels of management are informed when problems of safety significance are identified that are not specifically addressed in the Technical Specifications.

The procedural mechanism established in Administrative Procedure AD 1807.00 "Control of Conditions Adverse to Quality" provides for informing proper levels of management once an item is identified. However, the initial identification of an item of potential safety significance not covered in the Technical Specifications is essential. Toledo Edison is taking actions to improve this identification process. These actions center around the improved documentation of operational assumptions.

They include:

1. The updated Safety Analysis Report (SAR) -

Under 10 CFR 50.71, the SAR has been modified to reflect the design of the plant as of January 1, 1982. There was an attempt to centralize information into the text of the SAR rather than dispersed throughout the volumes in responses to questions. Further efforts will be made in the 1983 Revision to better consolidate operational assumptions. This will make the information more readily available for reference and training.

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2. Station operating procedures -

The station operating procedures undergo a required periodic review. Over the next review cycle for these procedures, efforts will be made to more definitively describe assumptions inherent in the systems operation.

These activities will define for the Operations and Training staffs the limitations and assumptions that are appropriate to the system performance. Deviations from these conditions will then be subject to Administrative Procedure AD 1807.00, "Control of Conditions Adverse to Quality", that brings these conditions to the attention of Station Management. These efforts are programmatic enhancements and will be ongoing over the next two years.

Very truly yours,

R P Crouse

RPC:TJM:nlf
cc: DB-1 NRC Resident Inspector
NRC NRR Project Manager