

AUG 22 1990

Docket No. 50-346

Toledo Edison Company  
ATTN: Mr. Donald Shelton  
Vice President  
Nuclear  
Edison Plaza  
300 Madison Avenue  
Toledo, OH 43652

Gentlemen:

This refers to the special safety inspection conducted by Mr. Joseph M. Ulie and others of this office on April 23-27, May 21-24, June 1, July 6, and August 16, 1990, of activities at the Davis-Besse Nuclear Power Station authorized by NRC Operating License No. NPF-3 and to the discussion of our findings with you and others of your staff at the conclusion of the inspection. The purpose of this inspection was to review the implementation of your post-fire safe shutdown capability as required by 10 CFR Part 50, Appendix R.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice. A written response is required.

A number of significant changes to the previously submitted Appendix R analyses were identified during this inspection. While we recognize that Toledo Edison has expended considerable engineering resources to meet post-fire safe shutdown capability requirements, we are concerned that after Toledo Edison has expended 7 years in reanalyzing the facility's post-fire safe shutdown capability, significant changes continue to be necessary. These changes are considered to be indicative of a weakness in Toledo Edison's Appendix R engineering/design program.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

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We will gladly discuss any questions you have concerning this inspection.

Sincerely,

ORIGINAL SIGNED BY HUBERT J. MILLER

Hubert J. Miller, Director  
Division of Reactor Safety

Enclosures:

- 1. Notice of Violation
- 2. Inspection Report  
No. 50-346/90007(DRS)

cc w/enclosures:

L. Storz, Plant Manager  
DCD/DCB (RIDS)  
Licensing Fee Management Branch  
Resident Inspector, RIII  
James W. Harris, State of Ohio  
Robert E. Owen, Ohio  
Department of Health  
A. Grandjean, State of Ohio,  
Public Utilities Commission

cc: D. Funk, RIII  
M.D. LYNCH, NRR

RIII  
Jolie/caa  
8/17/90

RIII  
Grabe  
8/21

RIII  
Butler  
8-17-90

RIII  
Pawlik  
8/21/90

**YES**  
RIII  
Gardner  
8/17/90

RIII  
Martin  
8/22

RIII  
8/20

RIII  
Miller

Yes  
RIII  
Knop  
8/10/90

RIII  
Ring  
8/21/90