



Docket No. 50-346

License No. NPF-3

Serial No. 1-294

September 8, 1982

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

Mr. J. F. Streeter, Chief
Projects Branch No. 2
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Streeter:

Toledo Edison acknowledges receipt of your August 10, 1982 letter (Log No. 1-664) and enclosures, Appendix, Notice of Violation and Inspection Report No. 50-346/82-18 (DPRP) referencing the violation concerning locked valves for Davis-Besse Nuclear Power Station Unit No. 1.

Violation: On May 29, 1982, Valves DH 21 and DH 23 were unlocked and opened to maintain decay heat flow while Valve DH 11 was stroked after maintenance. Valves DH 21 and DH 23 were not logged as open in the locked valve log as required by AD 1839.02. On June 7, 1982, Valves DA 30 and DA 44 were unlocked and shut for maintenance on Emergency Diesel Generator 1-1. These valves are located between the air receiver tanks and the diesel generator air start motors. Valves DA 30 and DA 44 were not logged as shut in the locked valve log. (The inoperability of the Emergency Diesel Generator was known by the Shift Supervisor and was properly turned over as inoperable to the oncoming shift. Also, no limiting condition of operation action statement was entered as the other Emergency Diesel Generator was operable and the plant was in cold shutdown.) These two incidents are examples of the same problem -- failure to follow established procedures. This is contrary to Technical Specification 6.8.1 which requires written procedures be implemented and is considered to be an item of non-compliance (50-346/82-18-01).

THE TOLEDO EDISON COMPANY EDISON PLAZA 300 MADISON AVENUE TOLEDO, OHIO 43652

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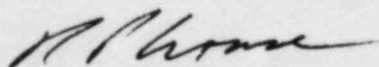
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Docket No. 50-346
License No. NPF-3
Serial No. 1-294
September 8, 1982
Page 2

Response:

1. Upon discovery, the valves were immediately entered in the Locked Valve Log as required by AD 1839.02. The Operations Supervisor discussed the events with the Shift Supervisors stressing the importance of strict procedure compliance and review of locked valve status at shift turnover.
2. As a result of LER 82-032 dated July 4, 1982 concerning another locked valve out of position, much more stringent administrative control was placed on locked valve operations. AD 1839.02 was modified to require that only a management Tagging Supervisor is permitted the use of the locked valve keys. The Tagging Supervisor must personally lock and unlock the padlocks associated with all locked valves. In addition, all locked valves at Davis-Besse were inspected and the locking devices modified as needed such that the valve locking device can only be applied one way. This will alleviate any problems concerning whether the valve is truly locked in position.
3. Since these described measures have been taken, no additional problems have resulted in the area of locked valves. We are confident that the correct actions taken have fully resolved the problem and that full compliance with the Technical Specifications has been achieved.

Very truly yours,



RPC:WTO:lab

cc: DB-1 NRC Resident Inspector