

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No.: 50-346/83-06(DPRP)

Docket No.: 50-346

License No.: NPF-3

Licensee: Toledo Edison Company
Edison Plaza
300 Madison Avenue
Toledo, OH 43652

Facility Name: Davis-Besse Nuclear Power Station

Enforcement Conference At: Toldeo Edison Company
Davis-Besse Administration Building
Davis-Besse Site
Oak Harbor, OH

Enforcement Conference Conducted: March 9, 1983

Prepared By: *W. G. Rogers*
W. G. Rogers

3-23-83

Approved By: *I. N. Jackiw*
I. N. Jackiw, Chief
Projects/Section 2B

3-23-83

Enforcement Conference Summary

Enforcement Conference on March 9, 1983 (Report No. 50-346/83-06(DPRP))

Areas Discussed: NRC concerns regarding (1) the lack of improvement of the licensee's maintenance program, (2) the adequacy of the licensee's corrective action in drawing control, (3) the licensee's corrective actions related to items (1) and (2), and (4) the licensee's equipment "operability" philosophy.

DETAILS

1. Meeting Attendees

Toledo Edison Company (TECo)

R. Crouse, Nuclear Vice President
T. Murray, Davis-Besse Station Superintendent
T. Myers, Nuclear Services Director
C. Daft, Quality Assurance Manager
J. Shortt, Power Engineering and Construction General Superintendent
B. Byer, Assistant Station Superintendent
J. Helle, Facility Engineering Manager
C. Calcamugio, Nuclear Engineering Manager Representative
G. Novack, Corporate Nuclear Review Board Chairman
L. Young, Nuclear Licensing
R. Peters, Nuclear Licensing
D. Poage, Quality Assurance Auditor
C. Meckbel, Drawing Control Task Force Head
P. Carr, Maintenance Engineer
J. Farris, Administrative Coordinator
R. South, Secretary

Nuclear Regulatory Commission (NRC)

C. Norelius, Director, Division of Project and Resident Programs
N. Jackiw, Chief, Projects Section 2B
L. Reyes, Chief, Test Programs Section
J. Stolz, Chief, Operating Reactors Branch No. 4, NRR
A. DeAgazio, Licensing Project Manager, NRR
T. Peebles, Senior Resident Inspector, Davis-Besse Site
W. Rogers, Resident Inspector, Davis-Besse Site

2. Opening Remarks

Mr. Norelius noted that this was an enforcement conference which is the first step in escalating enforcement action. He outlined the history of NRC's concerns (SALP II Report, IE Report 50-346/82-05 and IE Report 50-346/83-01) with regard to maintenance and drawing control and stated these areas were not acceptable at this time, and licensee attention is needed to preclude further escalated enforcement action.

3. Maintenance/Drawing Control Discussion

Mr. Peebles cited the areas of concern. These were: (1) failure of the maintenance administrative system to assure actual work performance was not being adequately documented, (2) fragmented equipment maintenance history, (3) marginal acceptable procedural guidance, (4) nonconformance reports (NCRs) not being issued against improper maintenance activities when a maintenance work order (MWO) was outstanding on that activity,

(5) deficient NCR tracking system, and (6) drawings not reflecting the as-built condition of the plant.

Mr. Rogers stated that the new drawing control system has the ability to adequately function; however, an administrative mechanism needs to be installed to assure drawing change notices (DCNs)/facility change notices (FCNs) are incorporated into drawing revisions in a timely manner. He further stated that, if facility change request (FCR) supplements are not reduced, the amount of DCNs/FCNs superseded and new DCNs/FCNs generated at the end of plant outages had the capability to overload the distribution system. He concluded by stating that the licensee's corrective action should at least address the current status of FCRs, schedules for corrective action implementation, training, when drawings would be revised, and QA involvement.

Mr. Crouse opened the licensee's presentation by indicating that they would be presenting a comprehensive program to correct their maintenance problems. Mr. Murray provided the elements of the program. The elements included changes in organization/work scope responsibility in facility modification, maintenance planning, and electrical maintenance areas. Other elements included abolishment of the work request system, providing more worker involvement to ensure quality performance, additional maintenance training (technical, administrative, management), more management field observations, a change in philosophy to require NCRs to be written on improper work activities even if a MWO was outstanding on the activity, and establishment of a drawing control task force reporting monthly to the Vice President-Nuclear on its progress.

The licensee agreed to delineate specifics of the comprehensive corrective action in response to this report.

4. Operability Discussion

Mr. Peebles discussed the NRC requirements for determining operability of equipment. NRC concerns relating to valve testing methods versus safety function to assure operability were also discussed.

Mr. Murray stated that the check valve testing program would be reviewed by the licensee.

5. Summary

The NRC requested and the licensee agreed to provide a written response delineating the licensee's corrective actions in the areas of maintenance and drawing control. Mr. Crouse requested that Region III meet with the licensee to discuss the details of their proposed comprehensive corrective action program prior to the licensee's written response to this report. Mr. Crouse stated that this would assure that all areas of NRC concerns were addressed in the program. Mr. Norelius agreed to such a meeting and it was agreed that the licensee would initiate the request for this meeting.