

DMB 016

Docket No. 50-346

AUG 22 1983

LICENSEE: Toledo Edison Company and  
Cleveland Electric Illuminating Company

FACILITY: Davis-Besse Nuclear Power Station, Unit No. 1

SUBJECT: SUMMARY OF MEETING, AUGUST 16, 1983, CONCERNING  
COMPLIANCE WITH 10 CFR 50.48

On August 6, 1983, representatives of Toledo Edison Company (TED) met with NRC personnel at Bethesda, Maryland. The meeting was a followup to the exit interview held with TED on July 29, 1983 at the conclusion of the NRC fire protection audit of the Davis-Besse station. This audit revealed a number of deficiencies with respect to fire protection requirements. These deficiencies were discussed at the exit interview.

The August 16, 1983, meeting was requested by the NRC. The purpose of the meeting was (a) to discuss what must be accomplished with respect to the audit findings, before restart of the Davis-Besse station, (b) discuss the schedule for making modifications to the facility and for developing necessary operational procedures to fully comply with 10 CFR 50-48 (c) to provide TED the opportunity to discuss what has been accomplished since the audit and (d) to provide an opportunity for TED to present a justification for startup and operation of the facility in the interim until the facility is in full compliance. It was stated that the NRC objective was that the meeting would result in a clear understanding of what TED commitments, to bring the facility into full compliance, will be required before Davis-Besse operation can resume.

TED presented a brief chronology of significant events relating to fire protection activities at Davis-Besse and described their accomplishments in the approximately 2 week interval since the completion of the fire protection audit and the planned activities (See Enclosure 1).

Enclosure 2 to this meeting summary was prepared by TED and represents their understanding of the deficiencies identified at the exit interview. This list was presented at the August 16, 1983 meeting as part of TED's status report. The NRC agreed to review this list and identify any omissions or misinterpretations. The NRC has reviewed enclosure 2 and confirms that it correctly represents the issues identified at the July 29, exit interview.

TED indicated that their review of the known fire protection deficiencies led them to conclude that there are no related safety concerns associated with Davis-Besse operation in the interim until the deficiencies can be corrected.

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SURNAME	.....	.....	.....	.....	.....	.....	.....
DATE	.....	.....	.....	.....	.....	.....	.....

TED indicated that a large number of the known deficiencies (Enclosure 2) can be corrected in the short term. Short term was defined as within several months but not necessarily before scheduled restart of the unit. Those items considered short term by TED are indicated by an encircled number (circles added by NRC) on enclosure 2. However, TED does not yet have a definitive overall schedule for corrective action. Some of the short term items may be correctable before restart; some of those that are not, it was suggested by TED, could have an LCO attached such as posting special fire watches, etc.

The NRC stated that with regard to justification for operation in the interim until deficiencies are corrected, the fact that action is being (or is going to be) taken to correct deficiencies is not by itself adequate justification. The NRC will require some corrective or compensating action even for the interim. For example, with regard to items 1, 2, and 3 of enclosure 2, even though TED considers that in the event of any "credible" fire in the control room or cable spreading room the existing operating procedures coupled with the fire preplan could safely handle the fire, the NRC would require something of an interim corrective measure e.g., interim procedures for hot standby and cold shutdown (even if not within 72 hours as prescribed in App. R) must be prepared and the operators trained in the use of the procedures and the preplan. In addition interim exemptions from the requirements of the regulation might be required. Also, interim modification to the facility may be appropriate. TED should examine the list of deficiencies and determine what interim measures can be taken to mitigate the consequences or lower the probability of potential fires.

The seriousness with which the NRC views the deficiencies at the Davis-Besse facility was expressed to the TED representatives. In light of this the NRC will require, by way of Confirmation of Action Letter (CAL), a specific action plan and associated schedule acceptable to the NRC before restart of Davis-Besse will be permitted. Some of the corrective actions that might be taken by TED were discussed. These are shown in enclosure 3.

TED agreed to review the NRC position and to submit their plan for correcting deficiencies for NRC review and acceptance prior to restart. Enclosure 4 is a list of meeting attendees.

*Original signed by*

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DATE ▶	8/22/83					

Toledo Edison Company

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MEETING SUMMARY DISTRIBUTION

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\*Copies also sent to those people on service (cc) list for subject plant(s).

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TOLEDO EDISON COMPANY  
FIRE PROTECTION PROGRAM

NRC MEETING - AUGUST 16, 1983

INTRODUCTION

HISTORY

POST-AUDIT ACTIONS

IMMEDIATE MANAGEMENT ACTIONS

SHORT TERM ACTIONS

LONG TERM ACTIONS

TOLEDO EDISON COMPANY  
FIRE PROTECTION PROGRAM

CHRONOLOGICAL LIST OF FIRE PROTECTION EVENTS

SEPT. 30, 1976	TOLEDO EDISON RECEIVES NRC BRANCH TECHNICAL POSITION 9.5-1. NRC REQUESTS TOLEDO EDISON TO RE-EVALUATE ITS FIRE PROTECTION PROVISIONS OF DAVIS-BESSE.
FEB. 11, 1977	TOLEDO EDISON SUBMITS FIRE HAZARD ANALYSIS REPORT FOR NRC REVIEW.
APR. 22, 1977	NRC ISSUES DAVIS-BESSE OPERATING LICENSE.
MAY 23-25, 1978	NRC SITE VISIT ON FIRE PROTECTION.
OCT. 9, 1978	NRC TRANSMITS THE RESULTS OF THE FIRE PROTECTION SITE VISIT - TRIP REPORT.
OCT. 25, 1978	TOLEDO EDISON/NRC MEETING OF STAFF'S REVIEW OF FIRE PROTECTION PROGRAM.
JULY 30, 1979	NRC ISSUES LICENSE AMENDMENT NO. 18 AND FIRE PROTECTION SAFETY EVALUATION.
AUG. 28, 1979	TOLEDO EDISON RECEIVES EXTENSION FOR SERVICE WATER PUMP AND VALVE ROOM MODIFICATION UNTIL DECEMBER 31, 1979.
MAY 27, 1980	TOLEDO EDISON RECEIVES PROPOSED RULE WHICH ADDS NEW SECTION 50.48 AND APPENDIX R TO 10 CFR PART 50 FOR REVIEW AND COMMENT.
REFUELING 1980	COMPLETED FIRE PROTECTION MODIFICATION OF LICENSE AMENDMENT NO. 18.
DEC. 2, 1980	TOLEDO EDISON RECEIVES COPY OF 10 CFR PART 50, APPENDIX R, PUBLISHED NOVEMBER 19, 1980.
MAR. 2, 1981	TOLEDO EDISON RECEIVES FIRE PROTECTION RULE REQUIRING DB TO MEET REQUIREMENTS OF 10 CFR PART 50 APPENDIX R, SECTIONS 111.G, 111.J, AND 111.O.

CHRONOLOGICAL LIST      FIRE PROTECTION EVENTS  
CONTINUED

MAR. 19, 1981      TOLEDO EDISON SUBMITS PLANS, SCHEDULES,  
AND DESIGN DESCRIPTION OF BACKUP SERVICE  
WATER SYSTEM MODIFICATION.

\*JAN. 19, 1982      NRC SUBMITS SAFE SHUTDOWN CAPABILITY 10  
CFR 50 APPENDIX R - FIRE PROTECTION.

MAR. 23, 1982      NRC/TOLEDO EDISON MEETING AT BECHTEL  
CORP. OFFICES IN GAITHERSBURG.

APR. 29, 1982      TOLEDO EDISON SUBMITS EXEMPTION REQUESTS  
TO NRC FOR 10 CFR 50 APPENDIX R FOR THE  
COMPONENT COOLING WATER ROOM AND THE CONTROL  
ROOM.

MAR. 2, 1983      TOLEDO EDISON RECEIVES NRC STAFF'S  
POSITIONS REGARDING INSTRUMENTATION  
REQUIRED AND ALLOWABLE REPAIRS FOR  
ALTERNATIVE SHUTDOWN.

JULY 25-29, 1983      NRC APPENDIX R SITE VISIT.

TOLEDO EDISON COMPANY  
FIRE PROTECTION PROGRAM

POST AUDIT ACTIONS

- o IMMEDIATE MANAGEMENT ACTIONS
- o SHORT TERM ACTIONS
- o LONG TERM ACTIONS
  - LONG TERM GENERIC DEFICIENCY RESOLUTION
  - INTEGRATED LIVING SCHEDULE PLAN INCORPORATION

TOLEDO EDISON COMPANY  
FIRE PROTECTION PROGRAM

IMMEDIATE MANAGEMENT ACTIONS

1. TASK FORCE SET UP
2. ACTION PLAN DEVELOPMENT
3. PRIORITIZE ACTIONS
4. PERSONNEL ASSIGNMENT
5. LCO RESOLUTION ACTIVITIES
6. NUCLEAR UTILITY FIRE PROTECTION GROUP -  
INFORMATION EXCHANGE

TOLEDO EDISON COMPANY  
FIRE PROTECTION PROGRAM

SHORT-TERM POST-AUDIT ACTIONS

- 0 . INTENT IS TO RESOLVE SPECIFICALLY IDENTIFIED DEFICIENCY,  
A LONG TERM RESOLUTION EFFORT WILL VALIDATE AND MODIFY,  
IF NECESSARY.
- 0 FOR THE MOST PART THESE ARE RELATED TO NFPA EXCEPT
  - OIL COLLECTION SYSTEM
  - PROCEDURES
  - CABLE SPREADING ROOM/CONTROL ROOM
- 0 PRIORITY ITEMS:
  - PROCEDURES TO HOT STANDBY (OPERATIONS MODE 3)
  - SURVEILLANCE TESTING - FIRE DAMPER RESOLUTION
  - ACTION PLAN FINALIZATION FOR UNRESOLVED ITEMS

TOLEDO EDISON COMPANY  
FIRE PROTECTION PROGRAM

LONG TERM POST-AUDIT ACTIONS

PROGRAMMATIC - GENERIC RESOLUTIONS

- TASK 1      SAFE SHUTDOWN SYSTEMS REVERIFICATION
  
- TASK 2      FIRE HAZARDS ANALYSIS REPORT (FHAR)  
CORRELATION TO APPENDIX R
  
- TASK 3      FHAR - NFPA - USAR - TECHNICAL SPECIFICATIONS  
DOCUMENT COMPATIBILITY REVIEW
  
- TASK 4      EMERGENCY LIGHTING REVIEW
  
- TASK 5      AUXILLIARY SHUTDOWN PANEL CIRCUIT REVIEW
  
- TASK 6      ONE HOUR BARRIER REVIEW
  
- TASK 7      LICENSE AMENDMENT STATUS REVIEW

August 16, 1983

FIRE PROTECTION AUDIT RESPONSE  
DEFICIENCIES

DEFICIENCY

1. No alternate shutdown capability is demonstrated to get to hot shutdown as a result of a fire in the cable spreading room/control room.
2. No alternate shutdown capability is demonstrated to get to cold shutdown as a result of a fire in the cable spreading room/control room.
3. The auxiliary shutdown panel does not meet the shutdown capability requirements of App. R (i.e., source range flux,  $T_c$ , and the range for  $T_h$ ).
4. The emergency lighting does not meet the requirements of App. R (i.e., test failures, access and egress routes, lighting adequacy, positioning, installation).
- ⑤. Fire barriers do not meet three (3) hour App. R criteria (i.e., doors 215 and 217 not labeled as UL approved).
- ⑥. The reactor coolant pump oil collection system is not capable of collecting lube oil from all potential leakage sites from all four reactor coolant pumps as required.
- ⑦. The control of transient combustibles is not adequately demonstrated (i.e., mech. penet. room #3 had wood and wood chips stored since 4/30 with no work and no time limit on work or combustibles in area). Poor housekeeping.

August 16, 1983

FIRE PROTECTION AUDIT RESPONSE  
DEFICIENCIES

DEFICIENCY

⑧ Violation of Limiting Condition of Operation (LCO) concerning fire dampers: Period of 2 to 3 months, 3 dampers were inoperable with no fire watch due to:

- a. Operator error and failure to make proper notification.
- b. Inadequate test procedure.

Toledo Edison committed to:

- a. Correct procedure.
- b. All tests performed by individual on fire dampers will be re-performed.
- c. Records will be corrected while saving the old records for future review.
- d. A possible spot-check of all other tests performed by the operator to review for inaccuracies, if other tech. spec. tests were performed, and potential problems or discrepancies.

⑨ The service water discharge valve room does not meet the requirements of App. R, (i.e., discharge valves and local controllers are exposed to single disabling fire, one hour wrap deficiencies exist and partial vs. full suppression).

August 16, 1981

FIRE PROTECTION AUDIT RESPONSE  
DEFICIENCIES

DEFICIENCY

10. The one hour fire barriers are inadequate (i.e., test report discrepancies exist). Unresolved item - Additional documentation required.
11. The one hour wraps are incomplete, poorly installed and not in accordance with test installation (FCR 79-032 claims to be closed as well as no QA-QC on wraps).
12. Fire in Auxiliary Shutdown Panel can cause a loss of both trains of the auxiliary feedwater pump governor control circuitry. Indicates review of circuitry required and alternative S/D required.
- ⑬ Diesel Fire Pump Test procedure not written nor performed in accordance with requirements.
- ⑭ Fire hose stations not in accordance with requirements (no pressure reducers on stand pipes).
- ⑮ Modifications made to fire door to Room 320. No documentation nor FCR was found. Have modifications affected fire rating of door.
- ⑯ Several NFPA requirements regarding the sprinkler system were not met (i.e., placement of sprinklers, found in 1980 FP audit and no action identified).
- ⑰ No physical barriers exist around some yard hydrants/valves.
- ⑱ Fire pump test not in accordance with NFPA as stated in FSAR.

August 16, 1983

FIRE PROTECTION AUDIT RESPONSE  
DEFICIENCIES

DEFICIENCY

- ①9 Nonexistence of procedure for control of combustibles.
- ②0 Fire protection system flush, valve operation performed every three years vs. one year in NFPA.
- ②1 Fire detector maintenance. Dust accumulation requires photoelectric detector adjustment. Procedures did not address this.
- ②2 Procedures for fire door and damper maintenance identified no surveillance from 1978 until recently. NFPA requires a monthly visual check as a minimum. Not identified.
- ②3 Concerning emergency lighting, procedures should be revised to perform surveillance quarterly instead of semiannually.
- ②4 The level of training and knowledge and responsibility delineation for off-site fire department assistance is inadequate.
- ②5 Welding permits per NFPA 51 and 51B are not to be issued for greater than 24 hours. Weekly permits are allowed at D-B 1.

August 16, 1983

FIRE PROTECTION AUDIT RESPONSE  
DEFICIENCIES

DEFICIENCY

- (26) The following tests and test records are inadequate relative to NFPA:
- 1980-83 diesel pump tests.
  - 2" drain test only performed, additional tests required.
- (27) Off site contractors inadequately trained as fire watch.
28. Administrative Procedure AD 1810.00 - References License Amendment 18 concerning staffing. Fire protection coordinator is overworked, fire protection effort appears understaffed.
29. Concerning Hi/Lo pressure interfaces; verify nonexistence of such interfaces on PORV's and letdown cooler isolation valves.
- A. Procedures development to support Deficiency Nos. 1 and 2.
- B. FHAR review and update to 10CFR 50 Appendix R.

DBP 4328

FOR DISCUSSION PURPOSES

CORRECTIVE ACTIONS TO BE TAKEN  
TO SUPPORT RESTART OF THE DAVIS-BESSE NUCLEAR POWER STATION

1. Revise existing procedures for achieving hot standby to include achieving cold shutdown in the event of a fire in the control room and cable spreading room, using onsite power only. The revised procedures must integrate the information provided in the fire-preplan concerning potential effects of a fire in these areas. These procedures are to be reviewed (including walkdown) and approved in accordance with Section 6 of the Technical Specifications. Plant operators shall be trained in the use of the revised procedures.
- 2a. Perform a thorough review for compliance with the appropriate sections of 10 CFR 50, Appendix R, Sections III.G, III.J and III.O. If the review cannot be completed prior to startup, provide a schedule for its completion. Submit, the results of the above for NRC review, including documentation identifying for each fire area: 1) the safe shutdown equipment, 2) the method(s) used to comply with Section III.G. of Appendix R, and 3) any modifications required.
- b. Complete all modifications required to comply with Appendix R or request an exemption from NRC for those items which you do not intend to carry out or which cannot be completed prior to startup. Submit a schedule for NRC review and concurrence. Include appropriate justification for the schedule and describe the compensating actions to be taken during plant operation.

- c. As plant modifications are completed, revise your interim procedures, required in 1. above, so that hot standby and cold shutdown within 72 hours for a fire in the control room or cable spreading room can be achieved.
3. Provide a schedule for reviewing compliance with your previous commitments to BTP APCS 9.5.1. and NRC Supplemental Guideline Documents for fire protection.
4. Revise surveillance test procedures ST 5016.11, and PT 5112.01, Semi-Annual Emergency Lighting System Test to correct the inadequacies which exist in their acceptance criteria; and, perform the test on all fire dampers and emergency lighting units required to be operable.

ATTENDEES - AUGUST 16, 1983

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WSLittle REGIII  
PMcKee ORPB/DQASIP/IE  
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CBramsey REGIII  
RLSpessard REGIII  
TWambach ORB#5/DL/NRR  
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