



Docket No. 50-346

License No. NPF-3

Serial No. 1-400

January 23, 1984

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

PRINCIPAL STAFF			
RA*		DP	
D/RA			
A/RA		SP	
RC		A	
PAO			
SGA			
EMF			

Mr. C. Norelius, Director
Division of Engineering and Technical Programs
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Norelius:

This letter is to provide you with the current status of Toledo Edison's efforts with respect to items on non-compliance identified in Inspection Report no. 50-346/83-01 (Log No. 1-747). The inspection report contained a Notice of Violation in areas of document control, maintenance activities, and operability determination. The attachments contain the status of each of the above items as it relates to Davis-Besse Nuclear Power Station Unit 1.

Yours very truly,

Richard P Crouse /vbn

RPC:GAB:clj

Attachments

cj e/11-14

cc: DB-1 NRC Resident Inspector

Docket 50-346
License No. NPF-3
Serial No. 1-400
January 23, 1984

Attachment 1

On November 3, 1983, Company representatives met with Region III to review Toledo Edison's corrective action in response to NRC Inspection Report No. 50-346/83-01. The comprehensive program to resolve drawing control problems was outlined in TED letter to the NRC, Serial No. 1-352, dated April 29, 1983.

TED has ongoing activities and interim measures that we intend to use in completing the problem resolution. The interim measures have been communicated to the NRC Resident Inspector for his information and concurrence. All the corrective actions which had been committed to the NRC and discussed during the meeting are as follows:

- I. A central control group will be established to manage and maintain all drawing control activities.

The Engineering Administration Department was formed on March 1, 1983, to manage and maintain all drawing control activities and future data base activities. The new organization was given authority to coordinate all related drawing control activities and future data base transfer activities including procedural and instructional development.

- II. A Task Force will be established and will be charged with the responsibility of determining how Toledo Edison drawing control and distribution system can be improved.

On March 1, 1983, the Drawing Control Task Force was formed to review the overall drawing control problems and coordinate the efforts of the various departments within the Nuclear Mission. The Task Force was charged with the following:

1. Determine the best way to ensure the drawings currently in use reflect current Station "as-built" configuration.
2. Determine how the Toledo Edison drawing control and distribution system can be improved.

During the review and resolution process, the following areas were addressed by the Task Force:

1. To monitor the activities of the Station, Engineering Administration and Nuclear Facility Engineering, a responsibility chart was developed for the Task Force members in conjunction with the March 9, 1983, enforcement conference with the Nuclear Regulatory Commission. This responsibility chart outlined the specific tasks that had to be accomplished by the Task Force members in order to correct the overall problem.
2. To properly address recommendations on the ideal number of controlled drawing stations, a review was performed on this issue, and as a result seven (7) sets of controlled drawings were deleted leaving a total of 23 drawing stations within the protected area.
3. A review has been performed on the importance of various types of drawings used in the plant and the importance of specific systems, and as a result priorities have been established for drawing update. The priorities established are as follows:
 - A. P&ID
 - B. Electrical
 1. Elementary Wiring Diagram
 2. Motor Control Center
 3. One Line Diagram
 4. Specific Electrical Drawings (SFAS, SFRCS, EDG, Generator, etc.)
 - C. Mechanical
 - D. FSK
 - E. Civil

All the P&ID's were properly updated, all the Electrical and Mechanical drawings (with more than five change notices) have been forwarded to Bechtel for updating, and the updating of the Civil drawings is in process.

III. All drawing room clerks were required to read AD 1848.05 (Control of Drawings and Instructional Manuals).

All drawing room clerks read and reacquainted themselves with AD 1848.05 (Control of Drawings and Instruction Manuals). These clerks have been involved in the efforts to update the procedure as necessary changes have occurred, but this task is not yet completed. The procedure revisions are being reviewed with the Engineering Administration to ensure that continuity is maintained between the Station and Engineering in the control of drawings.

IV. The Administrative Coordinator will be assigned to monitor and coordinate the progress of the document control program within the Station.

On March 7, 1983, an Administrative Coordinator was assigned to monitor and coordinate the activities that are related to document control within the station. His written monthly reports to the

result of a review, Toledo Edison will take a completely different approach toward use of the Alpha drawings. A proposal to change the Alpha drawing control process was issued and discussions are being held to analyze the feasibility of this project. Design procedures were revised to prevent issuance of multiple revisions of Alpha drawings.

3. FCN Index

A 100% review was performed on Station Drawings and compared to the FCN Index by Engineering Administration and the Station on September 15, 1983. A list of discrepancies was prepared for resolution. In the process of resolving these discrepancies, several other deficiencies with the FCN control process were identified. As a result of these findings, Nuclear Facility Engineering has instituted a revised set of policies for control and use of FCNs to improve the ability to maintain drawings in the "as-built" configuration. It is expected that the reverification of the FCN log in accordance with these revised policies will be completed by March 31, 1984.

4. Drawing Log

A 100% verification was performed on the drawing log by Engineering Administration prior to November 1, 1983. As a result of this review, a list of 123 missing drawings was prepared and was sent to Bechtel. Bechtel provided the drawings on January 3, 1984.

5. VDCN Log

The vendor drawing change notice (VDCN) log verification was completed prior to December 1, 1983. This log is being maintained in accordance with our day-to-day index maintenance procedure, and it is being kept as a controlled document.

6. Vendor Drawing Log

The vendor drawing status is 100% complete at this time. Following the review, a list of all the missing drawings was prepared and the list was forwarded to Bechtel for action. Bechtel is expected to provide these drawings by February 1, 1984.

VI. The Station drawing room clerks will update all controlled drawings within the protected area. Technical Support Center (TSC) drawings will be distributed and updated by Engineering Administration.

Engineering Administration has been updating all the drawings in the TSC since April 30, 1983. A drawing room clerk has been badged and the Station drawing control clerks have been updating all controlled drawings within the protected area since May 1, 1983.

Station Superintendent contain the current status on document control efforts.

A Document Control Group (DCG) was formed on August 1, 1983, under the direction of the Facility Modification Manager. The primary function of this group is the control of all FCR modifications (Capital and Operations/Maintenance) that require field implementation on or within the security fence area. DCG interfaces with the DBMMS and ensures proper documentation submittal prior to Nuclear Facility Engineering closeout.

- V. Toledo Edison will initiate a program to verify the accuracy of all drawing indices. Procedures for performing this verification and for keeping indices current will be in place by May 2, 1983, with program completion by December 31, 1983. The priorities for index index verification are as follows:

1.	DCN Index	8/1/83
2.	Alpha Index	9/1/83
3.	FCN Index	10/1/83
4.	Drawing Log	11/1/83
5.	VDCN Log	12/1/83
6.	Vendor Drawing Log	12/31/83

Toledo Edison established a program to verify the accuracy of all drawing indices. A Bechtel support team was assigned to review the indices and the present procedures/systems which govern the distribution of controlled drawings and drawing index verification.

As a result of this effort, the procedure for day-to-day index maintenance activities has been thoroughly reviewed and has been revised to streamline the process. In addition, a separate procedure/instruction was developed for each index verification. These procedures will prevent recurrence of the problems that were encountered with the drawing control process in the past.

1. DCN Index

The DCN index was verified and found to be accurate prior to August 1, 1983. The DCN Index has been maintained per our day-to-day index maintenance procedure since August 1, 1983, and it is being kept as a controlled document.

2. Alpha Index

The Task Force members performed an independent audit of the Alpha Drawing Logs. A list of Alpha Drawing Log discrepancies was prepared by the Station and was sent to Engineering Administration for resolution. As a result of this review, all the discrepancies were corrected and the Station had all the appropriate Alpha drawings per the Alpha Log.

However, subsequent use of the Alpha Log has shown that there are problems associated with the Alpha drawings because of issuance of multiple revisions for different FCRs. As a

- VII. A determination of the status of all open accessible FCR's, with revision of drawings to reflect as-built condition, will be completed by August 1, 1983. All FCR's requiring access to containment for as-built verification will be walked down prior to the start of the 1983 refueling outage.

There has been a major effort to status and close out FCR's for which work was completed previously but the FCR was not closed due to documentation problems specifically related to drawing updates. The Station was the lead organization in the statusing of all open FCR's with support from other organizations, as required. When the Task Force was initiated on March 1, 1983, 504 FCR's which were out for implementation and needed resolution to properly include any necessary changes in the as-built drawings were on the Station's status list. All of the 504 FCR's were resolved by September 13, 1983.

A list was compiled from the most recent FCR status list to identify those FCR's that required a walkdown during the 1983 refueling outage to verify the as-built status of the related drawings. All of the fourteen (14) FCR's, which needed walkdown to properly verify the as-built status of the related drawings, were completed prior to start-up.

- VIII. Quality Assurance will monitor this program to ensure the corrective action is accomplished.

Significant progress has been made in the area of drawing control as outlined in the preceding summary of activities. Quality Assurance has audited the ongoing activities and found them to be generally satisfactory.

The correction of the drawing control problem addresses the principal concern of AFR 581-1 and subsequently CAR 81-02. The extremely generic nature of AFR 581-1, dealing with unspecified project documents (drawings, prints, specifications, instruction books, lists, indices and procedures) makes it very difficult to determine when all project documents are current. Realistically, there is probably no instant in time when everything is current. There is a continual revision, updating, etc., of project documents which is part of the design/operation process.

In order to recognize the significant progress made in the drawing control area, Quality Assurance has indicated that they will review the overall situation with an eye towards closing AFR 581-1 and CAR 81-02. If the work completed warrants closing of these findings, a more specific AFR/CAR may be issued to continue focusing on the importance of keeping document control current.

It is anticipated that continued activity in the completion of items addressed in this summary and any that may result if a new

AFR/CAR is issued, will allow completion of these items in a timely fashion, probably within the next six months.

Outstanding Commitments

1. Station to complete changes to AD 1848.05 (Control of Drawings and Instruction Manuals) to reflect the current control process by February 1, 1984.
2. TED to take corrective action in the drawing control process of Alpha drawings to ensure that the drawings accurately reflect as-built conditions. Special Order No. 32-1 was issued on 12/16/83 to outline the new controls which have been instituted on the Alpha drawings.
3. Engineering Administration to reverify the FCN Log in accordance with newly instituted policies by March 31, 1984.
4. Engineering Administration prepared a list of missing vendor drawings on December 23, 1983. The list was forwarded to Bechtel who is expected to provide the missing drawings by February 1, 1984.
5. Station forces and Nuclear Facility Engineering to expedite closure of the remaining FCR's.
6. Quality Assurance to review the drawing control situation and consider closing AFR 581-1 and CAR 81-02 by February 1, 1984.
7. In the continuing effort to update all drawings, all P&ID's electrical, mechanical, and civil drawings are to be forwarded to Bechtel whenever more than five change notices are associated with the drawing.

Docket 50-346
License No. NPF-3
Serial No. 1-400
January 23, 1984

Attachment 2

The following is an update of the 17 items originally outlined in the TED letter to the NRC, Serial #1-352 dated April 29, 1983. Due to the ever changing scope of our comprehensive corrective action program in the maintenance area, updates to the specific statements made back in April have become difficult. The 17 original items have been redefined and are presently included in the 12 action plans currently under our Performance Enhancement Program (PEP). It should be emphasized that action plans may be added or deleted as we progress in this area. All future plans and updates will be made within the scope of the performance enhancement program.

- A. The Maintenance Department staff was briefed on the importance of using "as found" data in determining causes of equipment failures and malfunctions.

All maintenance personnel will be instructed in the requirements of conducting maintenance, with an emphasis on their responsibilities of documentation of work performed, and evaluation of equipment malfunction before the start of physical work. The training conducted will include procedural changes to AD 1844 and DBMMS. The training indicated above will be completed by May 9, 1983.

As indicated earlier and verified during the NRC 11-18-83 review, these topics were addressed in a briefing with all on site maintenance personnel on May 6, 1983, but no attendance list was taken. At that time, our interim plan was to hold another briefing and document the attendance. Since our change in Maintenance Engineers in October, these items are being addressed in a different manner. All of the topics mentioned above require constant attention and therefore are being factored into the Management by Objective (MBO) program being implemented within the maintenance management group and in the maintenance procedure AD 1844.00. It is recognized that the scope of responsibility and the nature of responsibilities and activities of all personnel within the maintenance section must be clearly defined.

- B. A Maintenance Specialist has been assigned to coordinate the responses to various maintenance related audit findings and commitments. This is being done to reduce the number of late commitment responses and to insure that proposed resolutions are followed to satisfactory completion.

A review and realignment of commitment tracking and related efforts has been completed. This particular commitment was considered completed by the NRC inspection on 11-18-83. Systems are in place to track all maintenance commitments, utilizing the Station Administrative Coordinator and Maintenance Department clerical support,

therefore, a maintenance specialist is no longer utilized to perform the tracking.

- C. The Davis-Besse Administrative Coordinator has been assigned, on a temporary basis, to assist both the Maintenance Engineer and Maintenance Specialist in monitoring administrative activities and establishing new administrative controls.

The Administrative Coordinator is assisting the Maintenance Engineer, as necessary for completion of all action items. He is also tracking all commitments for the Station and Maintenance Department. New logs have been implemented to assure that delinquent or deficient commitments receive prompt management attention. This item was considered closed by the NRC inspector on 11-18-83.

- D. A separate electrical group is being established within the Maintenance Department. At the present time this electrical staff is being augmented using contractor personnel on a temporary basis. It is planned to bring this group under the direction of a permanent Lead Electrical Support Engineer who will be hired by January 1, 1984.

The separate electrical group is in place and an acting lead electrical support engineer is directing the activities of the group until the permanent lead engineer position is filled. The permanent engineer has not been selected at this time and the interviewing process is continuing.

- E. To better distribute the work load within our recently formed Maintenance Planning Group, two additional planners and two data clerks will be permanently added to the staff by August 1, 1983. Here again, the present staff is being augmented on a temporary basis with contract personnel, until our additional permanent employees are in place.

The four additional permanent personnel have been added to our maintenance planning group. In addition we will be conducting a complete organizational review, in the months ahead, to assure that all areas have adequate resources.

- F. Toledo Edison is implementing, on a corporate wide basis, the Kepner-Tregoe Problem Solving and Decision Making Program. The Kepner-Tregoe Program is designed to improve the application of problem solving and decision making skills in daily job situations. The program has proven to give practical insights into common sense approaches for coping with the kinds of concerns faced on everyday jobs. All Nuclear Mission Maintenance management personnel are scheduled to complete the Kepner-Tregoe program by January 1, 1984.

Kepner-Tregoe training is nearly completed within the maintenance management organization. Two people remain to be given the training and they will be scheduled by our Corporate Training Organization when make up sessions are available during 1984.

- G. Management techniques used for other company management personnel are being extended to the foreman level. Establishment of performance standards, goals and objectives for each of them will be completed during the next year as their annual reviews are held.

During the weeks of 10/24/83 and 10/31/83, initial meetings were held with the 7 maintenance lead engineers and supervisors. These meetings have been used to establish a base for further improved communications between the Maintenance Engineer and his people. Formal MBO sessions with these 7 commenced the week of 11/7/83, and the Maintenance Engineer intends to have their MBO objectives in place in approximately six months. By that time, a plan for implementing the MBO process down through the foreman level of management will be completed.

- H. Management will become more involved in observation of daily activities through the cleanliness-material inspection program which will be instituted in May, 1983, through AD 1835.00 (Plant Cleanliness Inspection Program), and through a Job Observation Program, which will be implemented by June 1, 1983.

AD 1835.00 (Plant Cleanliness Inspection Program) was implemented on 6/23/83. The effectiveness of this procedure during its first three months was not up to our original expectations. Several departments charged with conducting and documenting monthly plant cleanliness tours did not do so during the refueling outage. Our Chemistry & Health Physics Department did conduct the monthly inspections in their areas. The Assistant Superintendent Operations has evaluated the procedure effectiveness based on these limited reports and will modify the procedure as needed by 3-1-84 to correct deficiencies. The Station Superintendent in his 10/31/83 staff meeting advised all departments to begin performing their inspections as outlined in the procedure.

AD 1844.08 (Job Observation) was implemented on 6/28/83. Approximately 20 job observation assignment sheets have been initiated to date. In early October a temporary modification to the procedure was made to clarify some minor details and also to indicate that the Maintenance Department Administrative Assistant will ensure follow-up actions are completed. With the change in Maintenance Engineer on 10/19/83, the final determination of follow-up responsibility is not certain. A detailed program review is being conducted and will be completed by 6-1-84. The job observation program may be incorporated into the MBO process.

- I. The Maintenance Engineer will issue a Standing Order to the Maintenance Department which will give further direction on the conduct of maintenance. This Standing Order will include requirements to review and conduct maintenance activities with special emphasis on identifying the causes of equipment failures, trending, and identification of possible generic problems. Additional emphasis will be placed on the fact that all equipment, especially safety related,

is to be maintained in a state of good repair. The Standing Order will be issued by June 2, 1983, and further amplified within each individual's goals and objectives.

At this time we do not plan to issue a special order. The concepts and requirements in this standing order will be addressed in AD 1844.00 (maintenance) which is to be revised in early 1984.

- J. The Maintenance Department has formed a pilot program called "Quality Circles" in the Mechanical Group. This program is designed to give more worker involvement in the conduct of their work to improve its quality. We are optimistic that this will be successful and will be expanded through the Company.

At this time, we recognize weaknesses in the Quality Circles Program as it was originally implemented. In terms of the Quality Circle Team's commitment, we have seen very positive results. Management's administrative response to the initial recommendation was not timely and the communication back to the Quality Circle team itself gave them the impression that management was not committed to the program. We plan to evaluate and correct deficiencies in the quality circles program by 5-31-84.

- K. An improved Preventative Maintenance Program under the direction of a coordinator has been established combining the Mechanical, Electrical, and I&C Preventative Maintenance into one system. A feedback system has been included to further increase the program effectiveness. The program includes a Master PM schedule and special work order numbering sequence for easy recognition. Future planned improvements to the Preventative Maintenance Program will include expanded vibration analysis/trending, a valve repacking/repair program, expanded lube oil analysis/trending, and expanded valve motor operator inspections. These planned improvements will be in place by the end of 1983.

A number of improvements have been made in our Preventative Maintenance Program in recent months. Earlier this year, one of our Maintenance Specialists was assigned to working with the PM Program and the Davis-Besse Maintenance Management System (DBMMS) implementation. As we indicated earlier, he is planning to make a number of further improvements. In addition to the above activities, our Maintenance Engineer has been evaluating the program. He has begun discussing the program with various Station individuals to ascertain how they perceive the program and to establish a good understanding and commitment to the program objectives. It is imperative that the philosophy of our PM program be clearly defined along with the scope, objectives, and responsibilities. Following the analysis in this area we will review and/or revise AD 1844.01 (Preventative Maintenance) to make sure that it adequately reflects our overall program and includes the necessary controls. It is anticipated that preventative maintenance will become an integral part of the maintenance efforts and may not always require a PM coordinator.

- L. Toledo Edison is planning to implement the initial phases of the Davis-Besse Maintenance Management System (DBMMS) by the end of 1983. DBMMS is a combined information tracking and scheduling system consisting of five conversion units. Each unit is inter-related and is intended to assist in the control and tracking of maintenance activities. This system includes a computerized information access system which will be utilized by our Maintenance Planning Group to improve station work flows. Further, the DBMMS Program will provide easier access to design and nameplate data, automatic work order generation and tracking, as well as an activities tracking program including Facility Change Request (FCR) status.

DBMMS implementation continues, and we are working to ensure effective utilization. The first three conversion units have been installed and training has been conducted. The last two conversion units are scheduled for implementation in the first quarter of 1984.

- M. In the past year, additional training of various Maintenance Department management personnel was established to further improve the conduct of maintenance. Our Training Department established a program designed to acquaint new engineers with plant systems, technical specifications and health physics procedures. This is a 240 hour self taught course which utilizes Station Technical Specification procedures, and system study guides along with a Computer Lesson Plan and Testing Program. Currently five Maintenance and seven I&C personnel are enrolled in or have completed the program.

The Maintenance Engineer is evaluating the overall concept of training within the Maintenance area and this course will play a part in the overall training program.

- N. A required reading program for the Maintenance Department staff and shops has been established which ensures dissemination of appropriate procedure changes and provides for annual review of Standing Orders, Special Orders, and Administrative Memorandums. The program is administered by the Training Department which ensures that the assigned reading is acknowledged. Training facilities and dedicated Maintenance Instructors have been established for electrical, mechanical, and I&C groups. This plan includes training on technical skills, as well as administrative requirements.

The required reading program is being monitored by our Training Department to ensure that it is functioning adequately within Maintenance.

- O. Communications within the Maintenance Department will be improved by regular meetings between managers, supervisors, and shop personnel. This will be in effect by July 1, 1983, and will provide a regular forum for the dissemination of information, policy, and problems; both up and down our organization.

The following meeting schedule has been implemented within the Maintenance Department and routine meetings are being conducted.

TIME

Maintenance Engineer & Staff	Monday at 9:30
Lead Maintenance Support Engineer & Staff	Friday at 3:00
Lead Maintenance Support Engineer, Maintenance Supervisor, Mechanical, Pipe and Weld Foremen, and Group Leaders	Fri. at 10:00
Lead I&C Engineer & Staff	Wed. at 7:30
Lead I&C Engineer, Maintenance Supervisor, Foremen, and Group Leaders	Wed. at 10:30
Lead Electrical Support Engineer, Staff, Maintenance Supervisor, Electrical Foremen	Thurs. at 10:00
Lead Electrical Support Engineer, Maintenance Supervisor, Station Services Foremen, and Group Leaders	Thurs. at 9:00

In addition to this formal schedule, the Maintenance Engineer is addressing the entire communications area. Effective communications are extremely important and will be the focus of major attention, with a decreased emphasis on formal group meetings.

P. Quality Assurance will monitor this program to ensure the corrective action is accomplished in accordance with the provisions of this response and the Toledo Edison Nuclear Quality Assurance Program. In addition, Quality Assurance will increase its surveillance of the day-to-day activities of the Maintenance Department.

QA developed checklists, and recently conducted a review of the status of our corrective action program.

Docket No. 50-346
License No. NPF-3
Serial No. 1-400
January 23, 1984

Attachment 3

Toledo Edison has implemented programs to correct the questions of operability and safety assessment. All but one of these programs are in place and that will be by March 1, 1984. Below is the status of each of the programs:

- A. Standardized procedures for safety evaluations, and for reviews by the SRB and CNRB for safety evaluations.

Toledo Edison has prepared a procedure for safety evaluation and was implemented on November 11, 1983.

- B. Increased emphasis on design assumptions listed in the current revision of the Updated Safety Analysis Report (USAR).

The procedure review process has been expanded to provide the reviewer with the related USAR sections for use in their assigned procedure reviews.

The current round of procedure reviews will be completed by December, 1984.

- C. Methods to record safety and operability requirements.

Completed.

- D. Performance of a thorough review of Toledo Edison's ASME Section XI Inservice Inspection check valve testing program.

Completed.

- E. Upgrading the testing of and procedures for Technical Specification mandated alarms.

Completed.

cj e/11