

Docket No. 50-346

License No. NPF-3

Serial No. 1-468

October 3, 1984



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

Mr. C. E. Norelius, Director
Division of Reactor Projects
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Norelius:

Toledo Edison acknowledges receipt of your September 7, 1984 letter (Log No. 1-1025), requesting an amended response to Item 3 in our August 17, 1984 letter (Serial No. 1-459), which was in response to Inspection Report No. 50-346/84-09 (DRS) (Log No. 1-992). Toledo Edison herein offers the amended response to this item:

3. Violation: 10 CFR 50, Appendix B, Criterion XVII, as implemented by the Toledo Edison Operating QA Program and the FSAR Section 17.2, require that the applicant shall provide record storage consistent with applicable regulatory requirements. The Toledo Edison QA Program commits to ANSI N45.2.9-1974 and Regulatory Guide 1.88, Revision 2, October, 1976, with an exception specifying a two hour fire protection rating for record storage facilities.

Contrary to the above, records of audits, auditor and QC inspector qualification/certification and calibrations were not provided the required protection.

This is a Severity Level V violation (Supplement I).

Response: ANSI N45.29-1974 contains the following definition of Quality Assurance Records.

"Quality Assurance Records - Those records which furnish documentary evidence of the quality of items and of activities affecting quality. For the purpose of this standard a document is considered a Quality Assurance Record when the document has been completed."

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The Toledo Edison Nuclear Quality Assurance Manual and Chapter 17.2 of the Updated Safety Analysis Report further defines a completed Quality Assurance Record as follows:

"Quality Assurance Records - A document is considered completed when all applicable information has been recorded and the record has been reviewed and approved by the applicable individuals."

Furthermore, the scope of ANSI N45.2.9-1974 states:

"It (this standard) is not intended to cover the preparation of the records, nor to include working documents not yet designated as Quality Assurance Records."

- a. The audit records stored in the Davis-Besse Administration Building (DBAB) are working records in which there are open audit findings. These documents are periodically updated to reflect actions taken to resolve the audit findings. Therefore, Toledo Edison considers these audit documents as working documents and subsequently not within the scope of the ANSI N45.2.9.
- b. Auditor qualification/certification records stored in the DBAB and Quality Control Inspector records stored in the Quality Control trailer will be transferred to a storage facility which meets the requirements of ANSI N45.2.9.

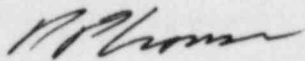
This will be accomplished prior to October 12, 1984.

- c. Records for the test and measuring equipment utilized by Quality Control have been transferred to the Instrument & Control (I&C) Shop for storage with the remainder of the Station I&C test and measuring equipment calibration records. In the I&C Shop, these records are stored in one hour fire rated cabinets and are maintained in individual folders for each piece of equipment under the calibration program. These folders provide an equipment history file for each piece of equipment and are periodically updated as calibration occurs.

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To clarify our position on the storage of calibration records, Toledo Edison will submit for your approval a change in our Nuclear Quality Assurance program to permit the storage of these records in one hour fire rated cabinets. This submittal will be made prior to November 1, 1984.

Very truly yours,

A handwritten signature in cursive script, appearing to read "M. Brown".

RPC:SGW:nlf
cc: DB-1 NRC Resident Inspector