

Docket No. 50-346

License No. NPF-3

Serial No. 1060

July 31, 1984



RICHARD P. CROUSE
Vice President
Nuclear
(415) 259-5221

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz
Operating Reactor Branch No. 4
Division of Operating Reactors
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Stolz:

On November 7, 1983 (Serial No. 1000), Toledo Edison submitted its initial response to Generic Letter 83-28 (Required Actions Based on Generic Implications of Salem ATWS Events, Log No. 1322, dated July 8, 1983).

This letter addresses the current actions taken and planned to be taken by the Toledo Edison Company in response to Section 2.2.2 and 3.2 at the Davis-Besse Nuclear Power Station, Unit No. 1.

With regard to Generic Letter 83-28, Section 2.2.2, we have evaluated the NUTAC report concerning the "Vendor Equipment Technical Information Program". We agree with the NUTAC recommendations and most of the elements in the NUTAC report are already in place for Toledo Edison's Davis-Besse Nuclear Power Station, Unit No. 1 (DB-1). Our current program and planned enhancements for DB-1 are described below.

1. Toledo Edison is committed to actively participate in the Nuclear Plant Reliability Data System (NPRDS). Our participation is documented in formal program procedures. Currently, failures at our operating plant are being reported. DB-1 has been consistently ranked among the top utilities for reporting equipment failures.

The responsibility for NPRDS activities has been delegated to our Nuclear Reliability Department. They rely on procedurally controlled input from other departments for the information which is included in the individual failure reports. Compliance with the reporting requirements under NUREG 1022 is ensured. This program has been functioning and evolving within Toledo Edison over the past seven years.

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2. Toledo Edison is involved in the Significant Event Evaluation and Information Network (SEE-IN) Program. The objective of SEE-IN is to ensure that the cumulative learning process from operating and maintenance experience is effective and that the lessons learned are reported and corrective action taken in a timely manner to improve plant safety, reliability, and availability.

Through this program, information about significant events and alternative solutions are transmitted in a timely manner via Nuclear Network to utilities, INPO, and (where applicable) vendors. Toledo Edison is evaluating the program as it is now implemented at Davis-Besse 1.

Upon completion of the evaluation, program enhancements will be recommended as necessary.

3. An interdivisional task force is currently reviewing our overall vendor information control program, as well as all Generic Letter 83-28 requirements, to ensure consistency and proper interface among the design, construction, and operating organizations.

In addition to reviewing the Toledo Edison overall Generic Letter response with regard to the requirements of Sections 2.2.2 and 3.2, the task force is specifically addressing:

1. The effectiveness of the internal handling of vendor information related to safety related equipment, including:
 - Vendor Technical Bulletins
 - SEE-IN Program Information
 - Nuclear Plant Reliability Data System (NPRDS) Program Information
 - B&W Owners Information (Preliminary Safety Concerns (PSC's) and Owner Activities)
 - 10 CFR 21 Reports
 - 10 CFR 55(e) Reports
 - Licensee Event Reports (LER's) from Other Plants
 - Office of Inspection & Enforcement (I&E) Information Notices
 - Other

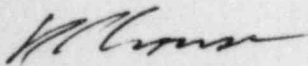
and

2. The post-maintenance testing requirements related to:
 - Technical Requirements
 - Safety Function Demonstration
 - Test Guidance Adequacy with Regard to Vendor Recommendations

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We have evaluated the administrative controls suggested by the NUTAC report for Davis-Besse 1. The additional enhancements and actions to the Toledo Edison Vendor Equipment Technical Information Program and Generic Letter 83-28 response to Sections 2.2.2. and 3.2 discussed above will be identified by January 18, 1985.

Very truly yours,



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