



**CENTERIOR
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United States Nuclear Regulatory Commission
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Washington, D. C. 20555

Subject: Response to Inspection Report 50-346/95007

Gentlemen:

Toledo Edison (TE) has received Inspection Report 95007 (Log Number 1-3615) and the enclosed Notice of Violation; the response to which is provided below.

Reply to a Notice of Violation (346/95007-03(DRP))

Alleged Violation

10 CFR Part 50, Appendix B, Criterion V, states, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Davis-Besse electrical maintenance procedure DB-MN-09301, "Preventive Maintenance For Type SMB and SMC Limitorque Valve Operators" required in Step 8.3.13 that the limit switch cover be installed as follows: a) Clean gasket surfaces, b) Inspect cover gaskets or o-rings, replace as necessary, and 3) Replace compartment covers.

Contrary to the above, on July 18, 1995, electrical maintenance personnel failed to adequately install the Limitorque operator limit switch compartment cover on Service Water valve SW 1399 following completion of VOTES testing. Specifically the associated bolts were not appropriately tightened, leaving up to a 1/2 inch gap between the edge of the cover and the valve operator body. This condition would have resulted in SW 1399 being inoperable if the deficient condition was not identified by the NRC prior to returning the valve to service.

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

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Operating Companies
Cleveland Electric Illuminating
Toledo Edison

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Toledo Edison Response

1. Reason for the Violation.

On July 18, 1995 two electrical maintenance personnel were performing preventive maintenance and motor-operated valve (MOV) diagnostic testing on valve SW 1399 in accordance with procedure DB-MN-09301, "Preventive Maintenance for Type SMB and SMC Limitorque Valve Operators" under Maintenance Work Order (MWO) 3-95-0947-01. Valve SW 1399 was properly removed from service during the maintenance and testing activities. During reassembly of the valve following the maintenance and testing, the limit switch compartment cover was incorrectly reinstalled by one of the electricians. Step 6.3.13 of procedure DB-ME-09301 requires the limit switch compartment cover be reinstalled. Installation of the limit switch compartment is considered to be "skill-of-the-craft" and is below the level of detail included in the procedure.

Both of the electricians were at the work site during the performance of the maintenance and diagnostic testing, however, the reinstallation of the limit switch compartment cover was performed by only one of the electricians. The other electrician did not check the reinstallation, but did sign off the procedure step as being completed, based upon poor communications with the electrician that actually performed the task.

Following completion of the maintenance and prior to restoring the valve to service, it was discovered that the limit switch compartment cover was improperly reinstalled. Potential Condition Adverse to Quality Report (PCAQR) 95-0605 was initiated, the limit switch compartment cover was properly reinstalled, and appropriate entries in the MWO work history were made. Valve SW 1399 was returned to service following the rework.

2. Corrective Steps Taken and Results Achieved.

As was mentioned above, PCAQR 95-0605 was initiated on July 18, 1995, to document the inadequate reinstallation of the limit switch compartment cover on valve SW 1399. This PCAQR facilitated the necessary rework to restore valve SW 1399 to operable status.

- The individuals involved in the incident were counseled with regard to their responsibilities for procedure compliance, procedure sign-offs, and effective communications. This incident was also discussed with both management and craft maintenance personnel at staff and shop meetings to reinforce management expectations regarding proper maintenance practices and supervisor responsibilities.
3. Corrective Steps That Will Be Taken To Avoid Further Violations.

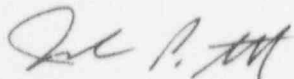
According to procedure DB-MN-00001, "Conduct of Maintenance", maintenance supervisors have overall responsibility for the ensuring that worksites are acceptably restored prior to returning equipment to service. TE believes that the degree of oversight provided by existing programs is appropriate in conjunction with management expectations of individual accountability for the proper performance of work and procedural compliance. These expectations are continually reinforced throughout the Davis-Besse Nuclear Power Station organizations.

4. Date When Full Compliance Will Be Achieved.

Full compliance was achieved on July 18, 1995, when the limit switch compartment cover for valve SW 1399 was properly reinstalled.

Should you have any questions or require additional information, please contact Mr. William T. O'Connor, Manager - Regulatory Affairs, at (419) 249-2366.

Very truly yours,



NKP/eld

cc: L. L. Gundrum, NRC Project Manager
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Utility Radiological Safety Board