

Docket No. 50-346

License No. NPF-3

Serial No. 1-455

July 27, 1984



RICHARD P. CROUSE
Vice President
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Mr. C. E. Norelius, Director
Division of Project & Resident Programs
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Norelius:

Toledo Edison acknowledges receipt of your June 29, 1984 letter (Log No. 1-981) and enclosures; Appendix, Notice of Violation; and Report 50-346/84-06 (DPRP), referencing two apparent violations.

Following an examination of the items of concern, Toledo Edison herein offers information regarding these items:

1. Violation: 10 CFR 50.72(b)(2)(ii) requires that any event or condition that results in manual or automatic actuation of any Engineering Safety Features (ESF), including the Reactor Protection System (RPS) shall be reported to the NRC within four-hours.

Contrary to the above, the licensee experienced RPS actuations on May 15, 1984 and May 17, 1984 on Shutdown Bypass High Pressure and did not make a four-hour notification to the NRC.

This is a Severity Level IV violation (Supplement 1).

Response: (1) Corrective action taken and the results achieved.

On May 16, 1984, a RPS low pressure trip was received. This automatic RPS trip occurred just prior to a preplanned manual trip, as per PP 1102.10, Plant Shutdown and Cooldown Procedure. The control rods had already been fully inserted when the trip was received. Since the automatic trip was just before the preplanned trip, it was interpreted as non-reportable under 10 CFR 50.72, and no notification was made to the NRC within four hours.

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On May 17, 1984, an RPS shutdown bypass high pressure trip was received. This automatic RPS trip occurred just prior to a preplanned manual trip, as per PP 1102.02, Plant Startup Procedure. Since the automatic trip was just before the preplanned trip, it was interpreted as non-reportable under 10 CFR 50.72 and no notification was made to the NRC within four hours.

A review of the event was conducted with the Shift Supervisors involved.

- (2) Corrective action taken to avoid further noncompliance.

An intra-company memorandum was distributed to all licensed personnel reminding them to comply with 10 CFR 50.72 and Standing Order No. 31, NRC Prompt Notification Requirements. The intra-company memorandum provided clarification of the exception to NRC notification within four hours of an Engineered Safety Features Actuation per 10 CFR 50.72.

- (3) Date when full compliance was achieved.

Full compliance was achieved July 19, 1984.

2. Violation:

10 CFR 50, Appendix B, Criterion XVI, Corrective Actions, states in part, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected."

The Toledo Edison QA Manual section 16.1.1 states in part, "Division Directors shall develop procedures to ensure that conditions adverse to quality such as equipment failures, equipment malfunctions, procedure deviations, defective material and equipment, and deviation to regulatory rules and requirements are promptly identified, documented and corrected."

Contrary to the above: (a) the licensee did not take prompt corrective action to establish procedures to report conditions adverse of quality. In the response to Inspection Report 83-19, the licensee stated all organizations involved in implementing the QA Manual would have procedures in-place to report conditions adverse to quality by April 1, 1984. As of April 23, 1984, the Divisions of Engineering, Nuclear Services, Procurement and Records Management did not have these procedures in-place. Also, the licensee had closed this item in their tracking system even though corrective action had not been completed.

This is a Severity Level IV violation (Supplement 1).

Response: (1) Corrective action taken and results achieved.

Quality Assurance (QA) has reviewed the corrective action procedure for organizations implementing the Nuclear Quality Assurance Manual to determine that the necessary procedures were in place. No deviations were noted.

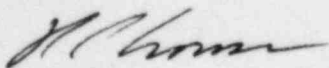
(2) Corrective action taken to avoid further noncompliance.

Procedures covering commitment tracking were reviewed by the QA Director and determined adequate to prevent recurrence of this event. Personnel involved in performing the corrective action have been counseled on the requirements for completing commitments.

(3) Date when full compliance was achieved.

Full compliance was achieved July 19, 1984.

Very truly yours,



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