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Docket Number 50-346

License Number NPF-3

Serial Number 1-1087

December 20, 1995

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Subject: Response to Inspection Report 50-346/95008

Gentlemen:

Toledo Edison (TE) has received Inspection Report 950008 (Log Number 1-3634) and the enclosed Notice of Violation, the response to which is provided below.

Reply to a Notice of Violation (346/95008-04(DRP))

Stated Violation

10 CFR Part 50, Appendix B, Criterion V, stated, 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."

Licensee Nuclear Quality Assurance Manual Section 11.4.1.8 stated, in part, that "Surveillance and Periodic Tests shall be scheduled and tracked in accordance with station administrative procedures to ensure timely conduct of tests."

Licensee procedure DB-DP-00013, Surveillance and Periodic Test Program, paragraph 4.1, stated, in part, that "A Critical Periodic Test is a Periodic Test considered to be important to the operation of the plant, and is required to be performed on a routine schedule. A Critical Periodic Test may be the result of a regulatory commitment, or it may contain acceptance criteria or data (once reviewed) that could affect a Technical Specification OPERABILITY determination."

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Operating Companies:
Cleveland Electric Illuminating
Toledo Edison

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Contrary to the above, on August 17, 1995, it was determined that the instrument loop associated with plant computer point T413, the control room indication used by operations personnel to determine that the Ultimate Heat Sink Temperature was less than its Technical Specification Limit of 85 degrees F, was not included in the licensee's surveillance and periodic test program since 1990. (50-346/95008-04(DRP))

This is a severity level IV violation (Supplement I).

Toledo Edison Response

1. Reason for the violation.

The initial concern regarding the Technical Specification (TS) temperature monitoring instrumentation for the Ultimate Heat Sink (UHS) was identified by the Nuclear Regulatory Commission (NRC) in a prior Inspection Report as an Unresolved Item (50-346/95007-04(DRP)). The NRC noted that two local temperature indicators monitoring service water inlet temperature (TI1500 and TI1501) were approximately four degrees higher than temperatures displayed by plant computer point indicating station intake forebay temperature (T413), which is used to verify compliance with TS 3.7.5.1, Ultimate Heat Sink. This discrepancy was discussed with TE personnel who began an evaluation of the discrepancy.

This evaluation concluded that the original instrumentation used to verify compliance with TS 3.7.5.1 was removed from service and the alternate instrumentation used to verify compliance with TS 3.7.5.1 was not included in the Preventive Maintenance (PM) or Surveillance Test (ST) programs to ensure the instruments were periodically calibrated. The original instrument used to verify the UHS temperature was temperature instrument TI843. While in use, temperature instrument TI843 was periodically calibrated as part of the PM program. Maintenance problems with TI843 led to the initiation of a procedure change to DB-OP-03007, Miscellaneous Instrument Daily Checks, which allowed the use of temperature instruments T413, TI1500, or TI1501 as alternate means of verifying UHS temperature for compliance with TS 3.7.5.1. Continued problems with TI843 resulted in another change to procedure DB-OP-03007 in September, 1990. This change specified T413 as the primary instrument for measuring UHS temperature. Instruments TI1500 and TI1501 were specified alternate indications. Instrument TI843 was subsequently removed from the plant. The preparers and reviewers for the procedure changes mentioned above did not identify that the substituted instruments used to verify TS compliance were to be periodically calibrated as part of either the PM or ST programs.

Toledo Edison verified that instruments used to verify TS compliance were periodically calibrated under the ST or PM programs in 1987 in response to previous NRC concerns. Governing procedures for the surveillance test program, the PM program and the procedure change program were not explicit in making the user aware of the requirements for periodic calibration of instrumentation used to verify TS compliance. As a result, temperature indications for UHS temperature were substituted into DB-OP-03007 without verifying they were included in the ST or PM programs.

2. Corrective Actions Taken and Results Achieved

Potential Condition Adverse to Quality Report (PCAQR) 95-0681 was initiated on August 16, 1995, to document the identified discrepancy between T413 and other instruments used to verify the UHS temperature readings.

Maintenance Work Order (MWO) MWO 1-94-0913-00 was initiated to calibrate the temperature instrument string associated with T413. On August 18, 1995, the temperature instrument string associated with T413 was calibrated. Toledo Edison determined that the instrumentation was within allowable tolerances and UHS temperatures had remained within TS limits.

During an extent of condition review, it was discovered that two additional instruments used to verify TS compliance were also not periodically calibrated. Instrument TI1501, which is used to indicate UHS temperature if T413 is inoperable, and TIS5445, which is used to indicate the Control Room temperature when the Control Room Emergency Ventilation System is operating, were not included in the PM or ST programs. Procedure DB-OP-03007, was changed on September 8, 1995, to eliminate use of TI1501 as an alternate to T413 until TI1501 is calibrated as part of the PM program. Procedure DB-OP-03006, Miscellaneous Instrument Shift Check, was also changed on September 8, 1995 to eliminate the use of TIS5445 to verify compliance with TS 4.7.6.1.a, Control Room Emergency Ventilation System. An alternate means for measuring Control Room (CR) temperature is specified that meets the instrument periodic calibration requirements. Since the CR is continuously occupied, it is unlikely that the 110 degrees F TS temperature limit could have been exceeded without the knowledge of the CR personnel. Therefore, the use of an uncalibrated instrument for CR temperature measurement had no impact on TS compliance in this case.

In October 1995, additional guidance was provided to procedure sponsors and qualified reviewers in a sitewide newsletter. This guidance reminded the Davis-Besse Nuclear Power Station staff of the requirements to ensure that instrumentation used to verify TS compliance must be included in a periodic calibration program.

3. Corrective Actions to Prevent Recurrence

Preventive Maintenance Approvals (PMAs) were initiated for the periodic calibration of instruments used to verify the UHS temperature (T413 and TI1501) that were not previously included in the PM program. These instruments are scheduled to be included in the PM program by January 31, 1996.

Toledo Edison will revise procedures to provide more detailed guidance to ensure that instruments used to verify TS compliance are included in a periodic calibration program. Revisions to procedures NG-NA-00115, Control of Procedures and DB-PF-00002, Preventive Maintenance Program will ensure that all groups that are responsible for changing surveillance or periodic test procedures are subject to these requirements. These procedure changes will be completed by January 31, 1996.

4. Date When Full Compliance Will Be Achieved.

Full compliance was achieved on September 8, 1995, when all instruments used to verify TS compliance were included in a periodic calibration program or were properly calibrated.

Should you have any questions or require additional information, please contact Mr. Peter W. Smith, Acting Manager - Regulatory Affairs, at (419) 249-2366.

Very truly yours,



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