

Docket No. 50-346
License No. NPF-3
Serial No. 1-489
January 3, 1985



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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:

This letter is to revise Toledo Edison's letter of March 9, 1983 (Serial 1-334), which responded to item of noncompliance 82-34-01, in your February 10, 1983 letter (Log 1-737), Inspection Report 50-346/82-34(DPRP).

Toledo Edison herein offers revised information regarding the item of noncompliance.

Violation: Technical Specification 4.2.1 requires that the Axial Power Imbalance be determined to be within limits once per hour when the Axial Power Imbalance alarm is inoperable and the unit is in Mode 1 at greater than 40% power.

Contrary to the above, for more than two months, the Axial Power Imbalance alarm was inoperable and the Axial Power Imbalance was not calculated hourly. Initial calibration of the alarm was not performed until more than two months of operations at greater than 40% power and no method existed for determining operability of the alarm or for alarms covered by Technical Specifications 4.1.2.1.1; 4.1.3.2.1; 4.1.3.3; 4.1.2.6; 4.1.3.9; or 4.2.4.

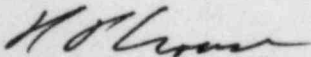
In our letter of March 9, 1983, Toledo Edison committed to incorporate the asymmetric rod fault alarm circuitry test into the control rod exercise monthly test. After further evaluation, however, the alarm circuitry test was incorporated into ST 5013.03, Control Rod Program Verification on July 5, 1983. The revision to ST 5013.03, which is performed at each refueling outage, requires verification and documentation that each control rod causes an asymmetric alarm.

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The basis for performing this test at a refueling outage frequency rather than during the monthly control rod exercise test is:

1. Unless the reactor is shutdown on a monthly basis, movement of individual control rods has the potential to cause localized power peaking within the core.
2. To move individual control rods at power, the Control Rod Drive System would have to be taken out of "aut.", causing unit power to drift with rod movement.
3. The Station computer performs an independent check for asymmetric rods every 30 seconds and actuates an alarm.
4. Should both fault alarms (i.e., asymmetric fault circuitry and computer check) fail to indicate an asymmetric rod, it would be found by:
 - a. The verification required by Technical Specification 4.1.3.1.1, that the position of each control rod shall be determined to be within the group average height limit by verifying the individual rod positions at least once per 12 hours.
 - b. A Quadrant Power Tilt (QPT) alarm will actuate if the asymmetric rod creates a large flux tilt, or
 - c. The Quadrant Power Tilt being different than normal. QPT is available on a CRT in the Control Room. Quadrant Power Tilt is required to be determined within limits as per Technical Specification 4.2.4.

Very truly yours,



RPC:SGW:DJF:nlf
cc: DB-i NRC Resident Inspector