



Donald C. Shelton
Vice President - Nuclear
Davis-Besse

300 Madison Avenue
Toledo, OH 43652-0001
(419) 249-2300

Docket Number 50-346

License Number NPF-3

Serial Number 2066

July 14, 1992

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

Subject: Change in responsibilities of the Engineering Assurance Unit

Gentlemen:

In accordance with 10 CFR 50.54(a)(3), Toledo Edison Company hereby submits its plans regarding a change in the Engineering Assurance (EA) Unit's responsibilities at the Davis-Besse Nuclear Power Station, Unit 1. It is proposed that the day-to-day, in-line quality review of specification and modification packages be eliminated.

These changes, as indicated in the attached 10 CFR 50.54(a) review, have been identified as a reduction to the commitments identified in USAR Chapter 17.2, Quality Assurance Program for Station Operation. Although these changes have been identified as a reduction in commitment, the Quality Assurance Program continues to satisfy the criteria of 10 CFR 50, Appendix B.

If you have any questions regarding this proposal, please contact Mr. Robert W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,

JMM/dlc

cc: A. B. Davis, Regional Administrator, NRC Region III
J. B. Hopkins, NRC Senior Project Manager
W. Levis, DB-1 NRC Senior Resident Inspector
Utility Radiological Safety Board

9207200261 920714
PDR ADDCK 05000346
P PDR

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

Handwritten notes:
Add: NRR | ALPR | LPERB | 1 1
NRR | DRIS | RVIOS | 1 1
4/1

TABLE OF CONTENTS

ELIMINATION OF ENGINEERING ASSURANCE
IN-LINE REVIEW OF TECHNICAL DOCUMENTS

Attachment, page 1	Davis-Besse Unit 1 USAR Section 17.2, page 17.2-8
Attachment, page 2	Proposed revisior: to Engineering Assurance's responsibilities as described on USAR page 17.2-8
Attachment, page 3	Proposed revision to design package review as described on USAR page 17.2-21
Attachment, page 4	10 CFR 50.54 review

D-B

DIRECTOR - DB ENGINEERING

The Director - DB Engineering reports directly to the Vice President - Nuclear, and is responsible for all engineering activity in support of design control, plant modifications, and system performance requirements for the Davis-Besse Nuclear Power Station.

MANAGER - ENGINEERING ASSURANCE AND SERVICES

The Manager - Engineering Assurance and Services reports directly to the Director - DB Engineering and is responsible for managing the independent quality review of procurement documents, engineering specifications, and plant modifications, engineering department self assessment activities, review and evaluation of plant chemistry and radiochemistry issues, engineering support services such as design process control, budget administration, procedure control and administration, engineering training, and vendor document processing.

MANAGER - NUCLEAR ENGINEERING

The Manager - Nuclear Engineering reports to the Director - DB Engineering and is responsible for managing and coordinating department function relating to reliability and risk assessment, nuclear reactor analysis, nuclear safety analysis, simulator engineering, reactor engineering, fuel performance and design, reactor refueling, core physics testing, and installation, improvements and maintenance of computer monitoring and computer aided engineering systems.

MANAGER - DESIGN ENGINEERING

The Manager - Design Engineering reports to the Director - DB Engineering and is responsible for managing Davis-Besse procurement and modification engineering, and associated safety evaluations to assure safe designs and continued conformance to design requirements. This includes the maintenance of design engineering drawings, specifications, and calculations. Additional responsibilities include engineering support to address non-routine technical issues related to the operation and maintenance of Davis-Besse.

MANAGER - SYSTEMS ENGINEERING

The Manager - System Engineering reports to the Director - DB Engineering and is responsible for minimizing Davis-Besse forced outage and lost capacity by providing systems engineering services to ensure proper installation, operation, preventive maintenance, testing, and problem resolution for optimum system performance and reliability. Additional responsibilities include the formulation, implementation, and periodic assessment of the effectiveness of the fire protection program.

MANAGER - PERFORMANCE ENGINEERING

The Manager - Performance Engineering reports to the Director - DB Engineering and is responsible for managing the activities of the Performance Engineering Section to provide direct day-to-day engineering support in the areas of plant thermal performance monitoring, inservice inspection

17.2.1.4 Toledo Edison Nuclear Group

MANAGER - ENGINEERING ASSURANCE AND SERVICES

Insert A

...independent assessments of Engineering activities and products, review and evaluation of plant chemistry and radiochemistry issues, engineering training coordination, and engineering support services such as design process control and vendor document processing.

be performed under the most adverse design conditions as determined by analysis.

When alternate calculations are performed to verify the correctness of the original calculations, they include provisions for verifying the appropriateness of assumptions, input data, and code or other calculation method used. The alternate method when used is required to provide results which are consistent with the original calculation or analysis.

5

17.2.3.5 Design Package Review

Prior to release, the completed design package is reviewed by Nuclear Group Departments affected by the design. All review comments are documented and resolved, and in addition, analyzed for potential impact on safety evaluations and design verifications.

5
8
5

Nuclear Safety Related (Q) design package development is also monitored on a day to day basis by Engineering Assurance to ensure the adequacy of engineering documents released for implementation.

14

Selected design modifications, documented by one or more design packages, are subjected to design evaluations under the direction of the Manager - Engineering Assurance and Services to assess the effectiveness of the design process and the technical adequacy of design products. Design evaluations are conducted by Engineering Assurance personnel supplemented as necessary by engineering department personnel having technical expertise in the areas to be evaluated. Participating engineering department personnel will not have responsibility for the design products to be evaluated, and their selection is approved by the Manager - Engineering Assurance and Services. In addition to correcting identified deficiencies, significant or recurring deficiencies are processed in accordance with Section 17.2.16.

9
9

14

10

9
9

14

9
5

17.2.4 PROCUREMENT DOCUMENT CONTROL

↑
Delete

7.2.4.1 General

The procurement of materials, components, equipment, consumables, spare and replacement parts, services, etc., necessary for plant operation, refueling, maintenance, and modification are controlled in accordance with approved procedures. These procedures specify measures that describe the process for the preparation and control of procurement documents, control of supplier and contractor performance, source evaluation and selection, source verification, receiving inspection and testing, and item or service acceptance. The requirements of ANSI N45.2.13 and ANSI N45.2.2 are incorporated into their procedures whenever the requirements are applicable.

5
8

14

Expeditious procurement activities are defined in procedures to support unanticipated requirements. These procedures contain provisions for material traceability and controls to prevent the declaration of operability of the system until such time that the activity and documentation requirements specified in the approved procurement document have been completed or evaluated by the Engineering Department for operability.

10
5

8

The procurement of spare or replacement parts for structures, systems and components within the scope of the Nuclear Quality Assurance Program are subject to requirements equal to or greater than the original requirements.

5

10CFR50.54 REVIEW JULY 10, 1992

PROPOSED ELIMINATION OF THE ENGINEERING ASSURANCE DAY-TO-DAY (IN-LINE) QUALITY REVIEW OF TECHNICAL DOCUMENTS (SPECIFICATIONS AND MODIFICATIONS)

CHANGE NUMBER 1

Paragraph 17.2.1 ORGANIZATION, page 17.2-8, subparagraph entitled MANAGER - ENGINEERING ASSURANCE AND SERVICES

Description Of Change

1. Change text from:

"...responsible for managing the independent quality review of procurement documents, engineering specifications, and plant modifications, engineering self assessment activities, review and evaluation of plant and radiochemistry issues, engineering support services such as design process control, budget administration, procedure control, engineering training, and vendor document processing."

responsible for managing independent assessments of Engineering specifications and products, review and evaluation of plant chemistry and radiochemistry issues, engineering training coordination, and engineering support services such as design process control and vendor document processing.

CHANGE NUMBER 2

Paragraph 17.2.3.5 Design Package Review, page 17.2-21

Description of change

Delete all text after the second sentence of the first paragraph. Beginning with "Nuclear Safety Related..."

Reason for Changes 1 and 2

The current responsibilities for performing in-line quality reviews of specifications and modifications were established under Davis-Besse Course of Action, Revision 6 dated January 3, 1986 (Serial Number 1231). These responsibilities were subsequently transferred from the Quality Assurance Department to the Engineering Department in accordance with a letter from Mr. D. C. Shelton to the NRC dated October 21, 1988 (Serial Number 1604). The commitment for doing an in-line review of procurement documents was changed in accordance with a letter from Mr. D. C. Shelton to the NRC dated May 28, 1991 (Serial Number 1-950) with NRC acceptance in June of 1991 (Log Number 1-2495).

Pursuant to these commitments as identified in USAR Chapter 17.2, Engineering Assurance has been performing an in-line quality review of Nuclear Safety Related (NSR) specifications and modification packages. Collective significance reviews of Engineering Assurance's assessment results since its formation in 1988 continue to indicate that no significant programmatic or prevalent technical problems exist. This in effect confirms that the formal design

verification process and inter discipline reviews inherent in the specification and modification development processes are working. Generally, Engineering Assurance's remaining issues deal with minor and administrative concerns which typically do not have safety implications and are generally identified and resolved as the products progress through implementation. It is further concluded that having assurance personnel involved in an in-line review sequence tends to present a compromising position for assurance personnel to independently assess a process for which they have in-line review responsibilities. It is in this regard that the above changes to eliminate Engineering Assurance's in-line quality review of specifications and modification packages are proposed.

Engineering Assurance will continue to assess Engineering activities and products as before, however on a more selective basis. This will allow management the flexibility to focus its self-assessment resources on issues of concern.

Effect of Change on the Davis-Besse USAR-
Chapter 17.2 Quality Assurance Program Description Commitments

These changes reduce the Quality Assurance Program description commitments previously accepted by the NRC. The proposed changes are to a quality assurance program description contained in docketed correspondence. The letter from Mr. D. C. Shelton to the NRC dated October 21, 1988 (Serial Number 1604), stated that the new Engineering Assurance organization would assume from the Quality Assurance Department the day-to-day quality review of specifications and modification packages. This letter did not however, in any way, change Quality Assurance Department functional responsibilities as defined in 10CFR50, Appendix A Criterion I or program requirements as defined by 10CFR50, Appendix B.

Since these proposed changes eliminate Engineering Assurance's commitment to perform day-to-day quality reviews of specifications and modification packages, it represents a reduction in commitment. NRC approval is required prior to implementing the proposed changes.

The basis for concluding that this change continues to satisfy the criteria of 10CFR50 Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC is as follows:

The proposed changes do not affect the assignment of quality assurance functions as defined in 10CFR50, Appendix A Criterion I. The Quality Assurance Department retains complete responsibility for assuring that a quality assurance program is established and effectively executed, and for verifying (i.e., by audit, surveillance, or inspection) that activities affecting the safety-related functions have been correctly performed. Engineering specification and modification activities have and continue to be subject to audit and surveillance by the Quality Assurance Department.

Though the subject changes represent a reduction in commitment, it does not affect Davis-Besse's 10CFR50, Appendix B program commitments and continues to meet the requirements of ANSI N45.2.11. This change is being proposed to establish greater day-to-day accountability with the technical unit responsible for the product, for quality work while returning the assurance role to a more appropriate periodic overview.