

SEP 17 1992

Docket No. 50-346

Centerior Service Company
ATTN: Mr. Donald Shelton
Vice President
Nuclear/Davis-Besse
c/o Toledo Edison Company
300 Madison Avenue
Toledo, OH 43652

Dear Mr. Shelton:

SUBJECT: NOTICE OF DEVIATION (NRC INSPECTION REPORT
NO. 50-346/92007(DRS))

This will acknowledge receipt of your letter dated August 6, 1992, in response to our letter dated July 7, 1992, transmitting a Notice of Deviation associated with Inspection Report No. 50-346/92007(DRS). This report summarizes the results of the special electrical distribution system functional inspection (EDSFI) at your Davis-Besse Nuclear Power Station. We have reviewed your corrective actions and have no further questions at this time. These corrective actions will be examined during future inspections.

Sincerely,

ORIGINAL SIGNED BY HUBERT J. MILLER

H. J. Miller, Director
Division of Reactor Safety

See Attached Distribution

RIII <i>(Yes)</i> <i>W</i> Westberg/jk 09/17/92	RIII <i>Jackiw</i> Jackiw 09/17/92	RIII <i>W Gardner</i> Gardner 09/17/92	RIII <i>Ring</i> Ring 09/17/92	RIII <i>pm</i> Martin 09/17/92	RIII <i>Miller</i> Miller 09/17/92
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Centerior Service Company
- c/o Toledo Edison Company

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Distribution

cc: L. Storz, Plant Manager

cc w/ltr dtd 08/06/92:

DCD/DCB (RIDS)

OC/LFDCB

Resident Inspector, RIII

James R. Williams, State of Ohio

Robert E. Owen, Ohio

Department of Health

A. Grandjean, State of Ohio,

Public Utilities Commission

J. B. Hopkins, LPM, NRR

E. Libro, NRR

W. Hodges, RI

J. Durr, RI

A. Gibson, RII

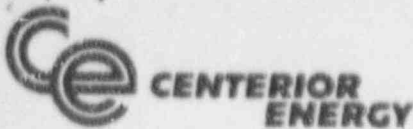
C. Julian, RII

S. Collins, RIV

T. Stetka, RIV

K. Perkins, RV

L. Miller, RV



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 1-993
August 6, 1992

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

Subject: Response to Inspection Report Number 50-346/920007

Gentlemen:

Toledo Edison (TE) has received Inspection Report 920007 (Log Number 1-2700) dated July 7, 1992, and provides the following response.

Deviation 92007-01: Updated Safety Analysis Report (USAR) section 9.5.4.2 states in part, that the fuel oil storage system meets the requirements of ANSI N195-1976.

- 1. Section 7.5 of ANSI N195 requires strainers to be provided in the fill line of each supply tank.

Contrary to the above, strainers were not installed in the fill lines of the day tanks.

- 2. Section 8(d) of ANSI N195 requires high level alarms to be provided for supply tanks.

Contrary to the above, high level alarms were not installed on the fuel oil storage tanks.

Response: Reason for the Deviation

These deviations occurred because of an oversight in the review and development of the Davis-Besse Nuclear Power Station (DB-1) FSAR during the original licensing process and the subsequent development of the USAR, since the FSAR and USAR do not adequately reflect the diesel fuel oil storage system design or TE's commitments with regard to the design. These deviations do not present any safety concerns since the present system design adequately supports the operability of the Emergency Diesel Generators.

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On January 28 and 29, 1976 discussions between the NRC Staff and TE were held to review the design of the diesel oil storage and transfer system. As a result of these discussions, Amendment 33 (Revision 17) to the DB-1 Final Safety Analysis Report (FSAR) was submitted on March 1, 1976. Revision 17 of the FSAR states:

"The system meets ANSI proposed standard N195, "Fuel Oil Systems for Standby Diesel Generators," with the following exceptions:

- a. No overflow line is provided from the day tanks back to the storage tank.
- b. No level indication is provided for the storage tanks. The level in these tanks will be determined at specified intervals by sounding the tanks. Between sounding intervals, indication of any circumstance requiring investigation is provided by the high/low level alarm.
- c. No pressure indicator is provided at the discharge of the transfer pumps. Proper operation of these pumps can be verified by observing the fill rate in the day tanks."

ANSI proposed standard N195 was utilized as the original design standard since ANSI N195-1976 was not published until April 12, 1976. In December 1976, the NRC documented its approval of the DB-1 design in Section 9.6.3 of the DB-1 Safety Evaluation Report (SER). Amendment 33 to the DB-1 FSAR was specifically mentioned, however, TE's commitments to ANSI N195-1976 or ANSI proposed N195 were not mentioned.

Design reviews in support of system modifications and USAR revisions, development of System Descriptions, and independent audits failed to identify these discrepancies. However, TE considers this to be an isolated occurrence as TE believes existing administrative controls, reviews and audits are sufficient to identify and correct deviations from USAR commitments.

Corrective Steps Which Have Been Taken and Results Achieved

USAR Change Notice (UCN) 92-061 has been initiated to reflect the current system design and provide further clarification of TE's commitments with regard to the design of the diesel fuel oil storage and transfer system. This UCN will be included in the next periodic update of the DB-1 USAR as required by 10 CFR 50.71(e).

Corrective Steps Which Will Be Taken To Avoid Further
Deviations

In addition to the USAR revision noted above, TE will provide for sufficient water and sediment filtration during tank filling. This will be accomplished using a portable filtering solid. Procedure revisions to procedure DB-OP-06273 necessary to effect this change will be completed by September 1, 1992.

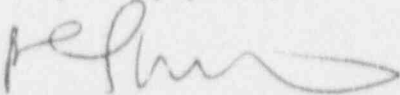
As was mentioned earlier, TE believes this to be an isolated occurrence. As such, existing administrative controls, periodic reviews and audits are sufficient to prevent future deviations from TE's commitments.

Date When Corrective Actions Will Be Complete

All corrective actions associated with the identified deviations will be completed by July 1993, the scheduled submitted date for the next revision of the DB-1 USAR.

Should you have any questions or require additional information, please contact Mr. Robert W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,



NKP/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