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United States Nuclear Regulatory Commission  
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Subject: Response to Supplement 1 of the Nuclear Regulatory Commission  
Generic Letter 87-02, "Verification of Seismic Adequacy of  
Mechanical and Electrical Equipment in Operating Reactors,  
Unresolved Safety Issue (USI) A-46"

Gentlemen:

Generic Letter 87-02 "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46" was issued by the NRC on February 19, 1987. This Generic Letter encouraged utilities to participate in a generic program to resolve the seismic verification issues associated with USI A-46. As a result, the Seismic Qualification Utility Group (SQUG) developed the "Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment". On May 22, 1992, the NRC Staff issued Generic Letter 87-02, Supplement 1, which constituted the NRC Staff's review of the GIP and included Supplemental Safety Evaluation Report Number 2 (SSER-2) on the GIP (where "GIP" refers to GIP, Revision 2, corrected February 14, 1992). The letter to SQUG enclosing SSER-2 requests that SQUG member utilities provide to the NRC, within 120 days, a schedule for implementing the GIP. In a letter to Mr. James G. Partlow, NRC/NRR Associate Director for Projects, dated August 21, 1992, SQUG clarified that the 120 days would expire on September 21, 1992. This letter provides Toledo Edison's response to the Staff's request.

As a member of SQUG, Toledo Edison commits to use the SQUG methodology as documented in the GIP Revision 2 to resolve USI A-46 at Davis-Besse Nuclear Power Station. The GIP, as evaluated by the Staff, permits licensees to deviate from the SQUG commitments embodied in the Commitment sections, provided the Staff is notified of substantial deviations prior to implementation. Toledo Edison recognizes that the

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Staff's position in SSER-2 is that, "if licensees use other methods that deviate from the criteria and procedures as described in SQUG commitments and in the implementation guidance of the GIP, Revision 2, without prior NRC staff approval, the method may not be acceptable to the staff and, therefore, may result in a deviation from the provisions of Generic Letter 87-02"

Specifically, Toledo Edison hereby commits to comply with the SQUG commitments set forth in the GIP in their entirety, including the clarifications, interpretations, and exceptions identified in SSER-2 as clarified by the August 21, 1992, SQUG letter responding to SSER-2.

Toledo Edison will be generally guided by the remaining (non-commitment) sections of the GIP, i.e., the implementation guidance, which comprises suggested methods for implementing the applicable commitments. Toledo Edison will notify the NRC as soon as practicable, but no later than the final USI A-46 summary report, of significant or programmatic deviations from the guidance portions of the GIP. Justifications for such deviations, will be retained on site for NRC review.

Toledo Edison will use the options provided in the GIP for defining seismic demand (a mean-centered and conservative, design in-structure response spectra) as appropriate, depending on the building, the location of equipment in the building, and equipment characteristics.

As recommended by Generic Letter 88-20, Supplement 4, "Individual Plant Examination External Events (IPEEE) for Severe Accident Vulnerabilities", final implementation will be carefully integrated with outage schedules and the seismic portion of the IPEEE. Considering the workload set forth by the criteria of the GIP, a Seismic Evaluation Report summarizing the results of the A-46 program at Davis Besse Nuclear Power Station will be submitted to the NRC by September 1, 1995. However, the A-46 program completion schedule may be affected by coordination with the seismic portion of the IPEEE, the scope and schedule for completing the necessary SQUG training, and by the availability of industry resources which may be unavailable because of the large number of licensees implementing this program. If the schedule committed to above cannot be met, Toledo Edison will notify the staff.

If you have any questions regarding the Toledo Edison's implementation of the SQUG program, please contact Mr. R. W. Schrauder, Manager - Nuclear Licensing at (419) 249-2366.

Very truly yours,



JGH/KAB/dlc

Enclosure

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

RESPONSE TO SUPPLEMENT No. 1 TO GENERIC LETTER 87-02


FOR

DAVIS-BESSE NUCLEAR POWER STATION

UNIT NUMBER 1

This letter is submitted in conformance with Section 182a of the Atomic Energy Act of 1954 as amended, and 10CFR50.54(f). Enclosed is Toledo Edison's response to Supplement No. 1 to Generic Letter 87-02, Verification of Seismic Adequacy of Mechanical and Electric Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46.

For:

  
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D. C. Shelton  
Vice President Nuclear

Sworn and subscribed before me this 17th day of September, 1992.

  
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Notary Public, State of Ohio

EVELYN L. DRESS  
NOTARY PUBLIC, STATE OF OHIO  
My Commission Expires July 28, 1994