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Docket Number 50-346

License Number NPF-3

Serial Number 1-1093

March 5, 1996

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

Subject: Response to Inspection Report 50-346/95009

Gentlemen:

Toledo Edison has received Inspection Report 95009 (Log Number 1-3664) and the enclosed Notice of Violation; the response to which is provided below.

Reply to a Notice of Violation (346/95009-01)

Alleged Violation

During Nuclear Regulatory Commission (NRC) inspections conducted on October 4, 1995, through December 15, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, the violation is listed below:

Technical Specification Section 6.8.1.a. stated in part that "Written procedures shall be established, implemented and maintained covering the activities...recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972."

Regulatory Guide 1.33, November, 1972, Appendix A, Section A.7 stated in part that "The following are typical safety related activities which should be covered by written procedures...Shift and Relief Turnover."

The Licensee's Shift Turnover Procedure, DB-OP-00100, Shift Turnover, paragraph 6.4.5.b stated, "Complete the Critical Systems Checklist and Critical Parameters Checklist. 1. These may be completed prior to turnover or during the panel

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Docket Number 50-346  
License Number NPF-3  
Serial Number 1-1093  
Page 2

walkdown, as desired by the Reactor Operators, but shall be completed before the on-coming and off-going Reactor Operators sign turnover complete."

Additionally, the shift turnover sheet required in Part II that the Critical Parameters Checklist be completed prior to assuming the shift.

Contrary to the above, on September 5, 1995, one of the offgoing Reactor Operators signed turnover complete and left the Control Room prior to the oncoming Reactor Operator completing the Critical Parameters Checklist.  
(50-346/95009-01)

This is a Severity Level IV violation (Supplement I).

#### Toledo Edison Response

##### 1. Reason for the Violation

The reason for this violation is personnel error by the oncoming Reactor Operator (RO) in not completing the Critical Parameters Checklist as required by procedure DB-OP-00100.

##### 2. Corrective Action Taken and Results Achieved

The Critical Parameters Checklist was completed by the oncoming RO, although the offgoing RO had left. The individual who failed to comply with the procedure was counseled on September 6, 1995 on the requirements of DB-OP-00100. An assessment of operator turnover practices was initiated by the Operations Superintendent. This assessment first focused on the amount of time being spent on turnover. Shorter time duration turnovers were then targeted for assessment of adequacy. Shift turnovers were observed to ensure the documentation required by procedure was properly completed, followed by detailed questioning of the oncoming RO to verify proper transfer of plant status information. No problems with oncoming RO knowledge level were identified.

In addition, an independent assessment was requested by the Operations Superintendent and was conducted by the Independent Safety Engineering (ISE) unit. Turnovers of both licensed and non-licensed operators were observed. The ISE unit concluded that turnovers were complete and conducted in a professional manner. It was also noted that Operations personnel were well prepared to conduct turnover and displayed an attitude that reflected the responsibilities being communicated.

Docket Number 50-346  
License Number NPF-3  
Serial Number 1-1093  
Page 3

Although the assessment did not reveal any inadequacy in knowledge or information transfer, the Operations Superintendent met with each shift and the Shift Supervisors were directed to reinforce management expectations that adequate time be taken to ensure a complete and thorough turnover in accordance with the requirements of DB-OP-00100. A memorandum was also issued to Operations Section personnel to additionally reinforce management expectations for the conduct of turnovers.

3. Corrective Actions to Prevent Recurrence

The issue of conducting complete and thorough turnovers was discussed at a combined Shift Supervisor/Assistant Shift Supervisor meeting. The expectation that Shift Management personnel monitor turnovers was reinforced. Operations management monitoring of turnover activities will serve to enhance management involvement and maintain a heightened awareness of management expectations for turnover.

In addition, the issue of proper turnover procedural adherence is being discussed by Operations management during the first operator requalification training cycle as part of the review of 1995 Operations Section performance.

4. Date When Full Compliance Will Be Achieved

Full compliance with the Shift Turnover procedure, DB-OP-00100, was achieved on September 5, 1995 when the oncoming RO completed the Critical Parameters Checklist.

Should you have any questions or require additional information, please contact Mr. James L. Freels, Manager - Regulatory Affairs, at (419) 249-2366.

Very truly yours,



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cc: L. L. Gundrum, NRC Project Manager  
H. J. Miller, Regional Administrator, NRC Region III  
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Utility Radiological Safety Board