



Docket No. 50-346

License No. NPF-3

Serial No. 1158

June 10, 1985

RICHARD P. CROUSE
Vice President
Nuclear
(419) 249-5221

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz
Operating Reactor Branch No. 4
Division of Operating Reactors
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Stolz:

This is in response to your letter dated April 2, 1985 (Log No. 1726) requesting additional information on Toledo Edison's response to Generic Letter 83-28, Required Actions Based on Generic Implications of Salem ATWS Event; Items 2.1, 2.2, and 3.2.3.

Attachment 1 provides the requested information for the Davis-Besse Nuclear Power Station. Additionally, per a telecon with Mr. A. DeAgazio (NRC Project Manager) and Mr. T. Taylor (Region III), Toledo Edison agreed to submit further information for Generic Letter 83-28, Item 3.2.2.

Very truly yours,

RPC/SGW/DLM/bjs

Enclosure

cc: DB-1 NRC Resident Inspector

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REQUEST FOR ADDITIONAL INFORMATION - RESPONSE TO
GENERIC LETTER 83-28

Item 2.1(2): Item 2.1(2) is incomplete in that a program for maintaining the files of vendor technical information for RTS components is not described nor referred to as requested in part 2 of item 2.1. This information shall be furnished. Lists of vendor technical manuals and dates appears sufficiently complete for review.

Response: The Reactor Trip System vendor manuals are administratively controlled per Nuclear Facility Engineering Division Procedure, NFES-040, Document Distribution Control. Nuclear Facility Engineering Division Procedure, NFEP-041, Vendor Manuals, controls requests for new vendor manuals and revisions, vendor manual supplements or bulletins to vendor manuals, issued under a purchase request.

In our January 18, 1985 letter (Serial No. 1114) we provided information relative to the implementation of a Vendor Equipment Technical Information Program (VETIP) and that vendor manuals would be included in this program. Implementation of VETIP is further discussed in the response to the requested additional information under Item 2.2.2.

Item 2.2.1(2): Your response needs to describe the information handling system - the methods used to develop and validate it are not given.

Response: The method for development of the information handling system includes the use of the Davis-Besse Q-list, which is currently a system level list, supplemented by controlled drawings and other source documents. The information handling system is being developed on the Davis-Besse Maintenance Management System as the Equipment Data Base (EDB) and will be a component level equipment listing.

Procedures have been developed for maintaining and updating the EDB. A review of the data being entered into the EDB is conducted per procedures. This review consists of evaluating the data against various source documents and other methods, such as; engineering specifications, drawings, Q-list, physical walkdown. Additionally, entry of data into the Equipment Data Base is verified by a second individual.

Item 2.2.2: Toledo Edison Company is currently developing a program to implement VETIP. Information is to be made available by January 18, 1985. A complete description of the program to implement VETIP, modification of current procedures, and how each element of the item 2.2.2 concern has been met will be required. In addition, Toledo Edison Company should supplement the response to accommodate the failure of NUTAC to address the concern about establishing and maintaining an interface to exchange technical information between the utility and all vendors of safety-related equipment. This additional information should describe how the interface will be established and maintained.

Response: In our letter of January 18, 1985 (Serial No. 1114), Toledo Edison provided a description of the plan for implementation of a VETIP at Davis-Besse. The surveys and results of the surveys committed to in our January 18, 1985 letter have been completed. We are currently evaluating the results of the surveys to identify where program enhancements are required.

The VETIP as defined in the MARCH, 1984 Nuclear Utility Task Action Committee (NUTAC) is considered by Toledo Edison and the industry to be a valid response to Item 2.2.2 of Generic Letter 83-28. Toledo Edison is continuing to implement the VETIP as described in our letter of January 18, 1985. Accordingly, it is requested that the NRC reanalyze and reconsider this request relative to the failure of NUTAC to address the NRC concerns about establishing and maintaining a vendor interface as described in Generic Letter 83-28.

Item 3.2.3: Results of review of test and maintenance program shall identify any post-maintenance testing that may degrade rather than enhance safety and shall provide justification for each designation.

Response: Toledo Edison letters of November 7, 1983 (Serial No. 1000) and January 18, 1985 (Serial No. 1114) identified that the Items 3.2.2 and 3.2.3 review would be integrated into one review process based on the results of the review of the appropriate Reactor Trip System procedures and vendor manuals. The review program being developed for Item 3.2.2 and 3.2.3 will be developed to:

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1. Ensure that vendor and engineering recommendations for all safety-related components have been added as appropriate test guidance to the test and maintenance procedures and/or Technical Specifications where required.
2. Ensure that no post-maintenance test requirements in existing Technical Specifications exist which are perceived to degrade rather than enhance safety.

In our January 18, 1985 letter, Toledo Edison indicated this review program would be implemented in accordance with our Integrated Living Schedule Program. In a telephone conference on May 16, 1985 with Mr. A. DeAgazio (NRC Project Manager) and Mr. T. Taylor (Region III), it was requested that Toledo Edison identify when the schedule for implementation of the program review would be available. The schedule for the program review will be completed by October 1, 1985.