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

Subject: Human Engineering Discrepancy (HED) Resolution Schedule

Gentlemen:

On April 9, 1987, Toledo Edison (TED) submitted a plan to perform eleven Special Studies (Serial No. 1350) to determine resolution for the 378 HEDs (twenty-nine of which were categorized as safety-significant) identified as part of the 1984 Detailed Control Room Design Review (DCRDR). In order to complete this task, TED formed Special Study Teams (consisting of at least one licensed operator, human factors specialist, and system and design engineer) to evaluate each HED and identify the corrective actions necessary to resolve the specific concerns of the HED. These Special Studies are now complete and the identified corrective actions have been scheduled for implementation.

The corrective actions identified by the Study Teams fall into three categories:

1) Those deemed necessary to resolve the 29 safety-significant HEDs,
2) Those deemed necessary to resolve operational concerns, and
3) Those deemed necessary to provide operational enhancements.

Those corrective actions deemed necessary to resolve the 29 safety-significant HEDs and the operational concerns are scheduled to be completed by the end of the fifth refueling outage (5RFO), with the exception of two corrective actions for HED No. 3.1.037 discussed below. The remainder of the corrective actions (i.e., those considered enhancements) are currently scheduled to be completed by the end of the sixth refueling outage (6RFO); although, some may be implemented earlier.

The Annunciator Special Study Team evaluated HED No. 3.1.037, entitled "Annunciators with Input From More Than One Parameter--", and determined

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that 14 of the 207 multiple input annunciators should be modified during the 5RFO such that they would "reflash" upon receiving a subsequent alarm signal. However, TED later determined that it would be necessary to defer two of the 14 reflash modifications (i.e., reflash for the EHC CTRL PANEL and EHC CABINET alarms for the turbine Electro-Hydraulic Control (EHC) System) until 6RFO. The two reflash modifications needed to be deferred because discrepancies with the EHC annunciator schemes were identified that would preclude installation of the reflash modifications until the field configuration of the EHC system could be modified. TED believes deferral of the two EHC reflash modifications is justified because:

1) The EHC System is not a safety system,
2) HED No. 3.1.037 has a safety-significance ranking of "Low",
3) The decision to implement the two EHC reflash modifications was based on operational versus safety considerations, and
4) Operational Procedures remain in place that provide Operator actions upon receiving the subject EHC alarms.

TED will promptly notify the NRC of any other unavoidable delays to this schedule.

Very truly yours,

CFM:sag

cc: A. B. Davis, Regional Administrator
A. W. DeAgazio, NRR/NRC, DB-1 Project Manager
DB-1 Resident Inspector