



A Centurion Energy Company

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License No. NPF-3

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

Subject: Response to Inspection Report No. 50-346/88014

Gentlemen:

Toledo Edison has received Inspection Report No. 50-346/88014 (Log No. 1-1827 dated June 8, 1988) and provides the following response:

Violation 88014-02	Technical Specifications, Section 6.8.1.b, states that written procedures shall be established, implemented, and maintained covering activities such as refueling operations. Toledo Edison Co. procedure AD 1828.16, "Non-Licensed Operator Proficiency Training Program," Revision 3, as it pertains to the training of refueling equipment operators, states in Part 5.1: "The Plant Manager is charged with the overall responsibility for ensuring that personnel assigned to the facility staff are qualified in accordance with the Nuclear Quality Assurance Manual (NQAM)." Procedure PP 1501.01, "Fuel Loading and Refueling Limits and Precaution," Revision 8, Part 5.4.1 states, in part, that refueling personnel must be thoroughly trained in the use of handling equipment and tools which they will use. Part 15.4.1.1 of the NQAM states, in part, that initial and continuing training programs shall be established for Nuclear Group and support personnel to ensure that they are knowledgeable of applicable equipment and capable of performing the assigned duties of their intended position.
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Contrary to the above, on May 11, 1988 during defueling operations a refueling equipment operator demonstrated a lack of sufficient knowledge to operate refueling equipment, as evidenced by an inability to operate the equipment without significant assistance from other personnel.

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Response: Acceptance or Denial of the Alleged Violation

Toledo Edison accepts the alleged violation.

Reason for the violation

Toledo Edison's (TED) investigation determined that two fuel handlers had not received hands-on training provided prior to defueling activities. This was provided as additional training, since hands-on training is not included in the ongoing requalification program. Requalification training for fuel handling was most recently provided in January and February of 1988. The hands-on training was intended to refresh and refamiliarize the equipment operators with the fuel handling system. The fuel handler, that allegedly demonstrated a lack of sufficient knowledge, attended the requalification training but missed the hands-on training. The training provided the fuel handlers was adequate but the process for ensuring that all fuel handlers had received this training was not. This was caused by poor communications and poor documentation. As a result, one fuel handler was allowed to assume his duties without the prescribed hands-on training.

Toledo Edison interviewed appropriate personnel to determine whether the fuel handler had encountered problems performing his assigned duties. The interviews indicated that the fuel handler had no real problems. The Fuel Handling Director did brief the fuel handler on the movements he would be performing at the Fuel Transfer Controls and interlocks that he should be aware of due to the upswitch for the reactor side on the east basket being inoperable. (The upswitch needed to be turned on manually each time to permit lowering of the fuel mast on the Main Fuel Handling Bridge.) Additionally, based on past observation this particular operator does have a tendency to ask questions to verify his actions.

At Davis-Besse, it is normal practice for a Reactor Performance Engineer to ride the Auxiliary Fuel Handling Bridge (AFHB) and provide assistance by answering any questions that may evolve during fuel movements. The Reactor Performance Engineer is not on the bridge to help the fuel handler perform his assigned duties but rather, his service is provided as a good practice to provide additional assurance that all fuel movements are performed correctly. Performance Engineering is extensively involved in all aspects of core alterations, including training, since they are most familiar with fuel related activities.

Toledo Edison would like to clarify that the duties of a fuel handler serving as a "Spotter" includes operating the AFHB and Fuel Transfer Controls. Also, the inspection report states that classroom and hands-on training was given to the fuel handlers prior to the refueling outage primarily to instruct them on

modifications made to the equipment. The training was given primarily to refresh and refamiliarize the equipment operators with the fuel handling system.

Based on the above, TED acknowledges that the fuel handler's failure to receive the hands-on training contributed to the NRC inspector's observation that the fuel handler was not thoroughly trained in the use of fuel handling equipment.

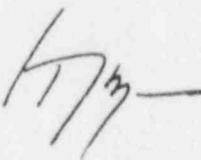
Corrective Actions Taken and Results Achieved

The Operations Superintendent has developed and will maintain a list of personnel qualified to perform fuel handling. Applicable procedures will be changed to require the Fuel Handling Director to ensure that fuel handlers have received all required training by checking the Operations Superintendent's list. In addition, Toledo Edison will formally require hands-on training for all equipment operators involved in fuel handling prior to refueling activities.

When Full Compliance Will Be Achieved

Applicable fuel handling procedures will be changed prior to refueling activities. Hands-on training will be incorporated into ongoing training programs, as appropriate, prior to the 6th refueling outage. The Operations Superintendent has already developed the list of personnel qualified to perform fuel handling and instructed the Fuel Handling Directors to verify their personnel as being qualified, per the list, prior to fuel load.

Very truly yours,

DC Shelton 

EBS/sag

cc: A. B. Davis, Regional Administrator
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