



Docket No. 50-346

License No. NPF-3

Serial No. 1-614

February 3, 1986

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Senior Vice President - Nuclear  
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Mr. C. J. Paperiello, Director  
Division of Reactor Safety  
United States Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Paperiello:

Toledo Edison acknowledges receipt of the December 27, 1985 letter (Log No. 1-1300), Notice of Violation, and Inspection Report No. 50-346/85035 (DRS). In accordance with our discussion with Mr. I. N. Jackiw on January 24, 1986, we requested and were granted a one week extension of the response due date to February 3, 1986. Following an examination of the item of concern, Toledo Edison herein offers information regarding these items:

Violation: As a result of the inspection conducted on November 12 through December 6, 1985, and in accordance with the "General Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the following violation was identified:

10 CFR 50, Appendix B, Criterion V, as implemented by Toledo Edison Company Nuclear Quality Assurance Manual and Nuclear Quality Assurance Procedure, requires activities affecting quality be accomplished in accordance with documented procedures.

Contrary to the above, the Bechtel engineering evaluations for Toledo Edison Company site QC issued Nonconformance Reports No. 85-0254 and No. 85-0256 for pipe anchors No. A-46 and No. A-47 utilized methods and values other than the stress allowable criteria prescribed in Bechtel Procedure MGP-04, Table 1, Section 3.3.(b).

This is a Severity Level V Violation (Supplement II).  
(50-346/85035-02)

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THE TOLEDO EDISON COMPANY EDISON PLAZA 300 MADISON AVENUE TOLEDO, OHIO 43652

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Response: (1) Corrective action taken and results achieved.

Calculation A-46 for Nonconformance Report (NCR) 85-0254 and Calculation A-47 for NCR 85-0256 were reviewed for conformance to Procedure MGP-04, "Procedure for Control of Interim/ Short-Term Allowable Stress Criteria for Seismic Category I Piping Systems at Davis-Besse Nuclear Power Station Unit No. 1". Calculation A-46 was determined to have utilized AISC code allowables and was subsequently revised (Revision 9) to incorporate ASME code allowables as required by Procedure MGP-04. It was determined that Calculation A-47 had utilized acceptable ASME code allowables but that they were different than as required by Procedure MGP-04. Calculation A-47 was determined to be acceptable using the appropriate ASME allowables required by Procedure MGP-04.

The NCR Log-A-Task 285378 was reviewed to determine which previously dispositioned NCRs involved attachments to pipes. Fifty-two NCRs were determined to involve attachments to pipes; however, only thirteen NCRs were specifically related to welds on integral attachments to pipe pressure boundaries. The thirteen NCRs were reviewed and determined to be acceptable utilizing the ASME code allowables required by Procedure MGP-04.

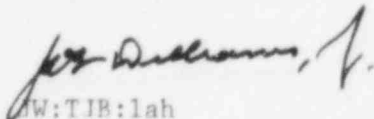
(2) Corrective action to be taken to avoid further violations.

Procedure CGP-04, "Procedure for Evaluating Nonconformance Reports Related to Pipe Supports, Pipe Anchors, and Seismic Restraints at Davis-Besse Nuclear Power Station Unit 1", was issued on January 28, 1986 to supplement procedure MCP-04 and provide design criteria clarification. This procedure has been issued and training has been provided to personnel performing NCR dispositions at Bechtel, Gaithersburg and at the Davis-Besse plant site.

(3) The date when full compliance will be achieved.

Full compliance has been achieved with the issuance of Procedure CGP-04 and the subsequent training which was completed on January 31, 1986.

Very truly yours,

  
JW:TJB:lah

cc: DB-1 NRC Resident Inspector