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Docket No. 50-346

License No. NPF-3

Serial No. 1-820

September 2, 1988

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

Subject: Response to NRC Violation 88006-05

Gentlemen:

The NRC issued violation 88006-05 in Inspection Report No. 88006. Toledo Edison (TE) responded on June 9, 1988 requesting the NRC to withdraw the violation. By letter dated July 6, 1988, the NRC informed Toledo Edison that it would not retract violation 88006-05. On August 10, 1988, TE requested a meeting to discuss the violation. Subsequently, the NRC agreed to an August 22, 1988 meeting date. The NRC also agreed to extend TE's response date a reasonable time period after the meeting.

In the July 6, 1988 letter, the NRC concluded that the violation was not adequately self-identified and the corrective actions taken were neither prompt, effective, nor complete. The NRC's conclusions were based on the following NRC findings:

- 1) The sightglass was installed (1977) seven years before the event without detailed drawings and instructions;
- 2) No design criteria or design guides were used in the seismic qualification calculation. Licensee's engineering calculation did not contain appropriate acceptance criteria which were required by the 10 CFR 50, Appendix B, Criterion V;
- 3) At the time of the inspection, design criteria were still being developed for the sightglass and the safety-related component modifications; and
- 4) The seismic qualification calculation should have been performed at the time of installation instead of nine years (1986) later.

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Violation 88006-05, as documented in Inspection Report 88006, is restated below:

10CFR50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented instruction, procedures, or drawings and be accomplished in accordance with these instructions/procedures or drawings. Instructions/procedures or drawings shall include appropriate acceptance criteria for determination that activities have been satisfactorily accomplished.

Contrary to the above, a review of FCR 78-024 pertaining to the installation of containment spray pump oil sightglass assemblies revealed the following:

- a) No design drawings or detailed drawings were used during the installation of the assemblies.
- b) No instructions/procedures were found for installation and inspection.
- c) No design criteria/instructions were utilized in the seismic qualification evaluation.

Toledo Edison provides the following revised response to violation 88006-05.

Response:

Acknowledgment or Denial of the Alleged Violation

Toledo Edison accepts the alleged violation.

Reason for the Violation

During the System Review and Test Program (SRTP) (1985-1986), TE observed the containment spray pump oil sightglasses were installed in 1977 without proper drawings or instructions and that a seismic qualification evaluation was not performed prior to the installation in 1977. This finding was documented on Deviation Report 86-037 on February 13, 1986 to initiate appropriate corrective action. Mechanical Calculation No. C-ME-61.01-076, Revision 0, was completed on February 28, 1986 and supports the seismic qualification of the oil sightglass assemblies. On March 3, 1986, FCR 78-024 Rev. A, was initiated to match the vendor design drawing to the as-built configuration. A revised safety evaluation for FCR 78-024, justifying this configuration, was completed on May 7, 1986.

Violation 88006-05 was identified during an NRC inspection to review Davis-Besse's FCR and modification program. This inspection was conducted in February and March of 1988. The inspection report notes that inspectors reviewed the documents contained in FCR 78-024 and observed that TE performed the installation of the oil sightglasses on the CS pumps in 1977 without appropriate TE and NRC requirements being met.

Although a seismic qualification evaluation had not been performed prior to installation, the subsequent calculation performed in 1986 confirmed the oil sightglass assemblies were seismically qualified. The inspector reviewed Calculation No. C-ME-61.01-076 and identified concerns with the methodology and the design criteria used to perform the calculation. The calculation had utilized conservative floor response spectra (i.e., floor elevation above the pump) and the effect of the sightglass assembly on the seismic qualification of the pump was not specifically addressed. TE revised the seismic calculation (C-CSS-61.01-102) using floor response spectra for the floor elevation of the pump and specifically identified the effect of the sightglass assembly on the seismic qualification of the pump.

During a meeting held at the NRC Region III office on August 22, 1988, TE described the program in place at the time the original seismic qualification calculation (C-ME-61.01-076) was performed. Specifically, Section 5 of the Nuclear Quality Assurance Manual (NQAM) states: "Procedures shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

At the time the calculation was performed, this requirement was fulfilled qualitatively by Procedure NEFP 080 which required that calculations state the design and acceptance criteria used. This was done in calculations C-ME-61.01-076 and C-CSS-61.01-102. The procedure has since been superseded by NEP-080 which still invokes the same qualitative requirements. TE believes that this method satisfies the intent of 10CFR50 Appendix B, Criterion V.

Corrective Actions Taken and Results Achieved

Toledo Edison corrected the specific concerns related to the deviation in the 1977 installation of the oil sightglass assemblies after identifying the problem during the S RTP review as described above. The seismic qualification calculation was revised and approved on March 4, 1988, as documented in the inspection report. Corrective actions for generic concerns were implemented subsequent to the June 9, 1985 event in response to violations relating to programmatic control of modifications and as part of overall improvement efforts. As a result, the processes for the design of modifications, control of work and reviews for changes to safety-related systems have been vastly improved. The Davis-Besse Design Criteria Manual was developed which primarily compiles existing design information that was contained in several other sources and not clearly delineated. This manual constitutes a major improvement in the D-B design process. Its intent is to provide a general understanding of the plant design bases and the relationship between its component parts.

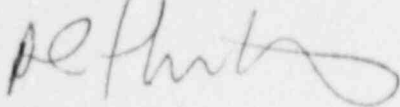
Toledo Edison will develop and implement a sampling program to evaluate seismic calculations performed since January 1, 1986, to re-confirm that appropriate design criteria have been utilized. The sampling program will be completed by March 31, 1989.

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When Full Compliance will be Achieved

FCR 78-024 Rev. A implementation was complete on July 29, 1986. Full compliance was achieved on March 4, 1988 with the approval of Calculation No. C-CSS-61.01-102.

Very truly yours,



EBS/tlt

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