

September 14, 1988

Docket No. 50-346
Serial No. DB-88-045

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Mr. Donald C. Shelton
Vice President - Nuclear
Toledo Edison Company
Edison Plaza - Stop 712
300 Madison Avenue
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Dear Mr. Shelton:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - RESPONSE TO GENERIC LETTER
83-28 (TAC 53748)

The NRC staff has performed a review of the information you provided in response to GL 83-28, items 3.2.1 and 3.2.2, and determined that the information is insufficient with regards to both these items. Your immediate attention in this matter is requested, since these issues have remained outstanding for 5 years. The subject items are restated below for your information, followed by a brief discussion of each item and guidelines for your use in preparation of your additional submittals.

3.2 Post-Maintenance Testing (All Other Safety-Related Components)

Position

The following actions are applicable to post-maintenance testing:

1. Licensees and applicants shall submit a report documenting the extending of test and maintenance procedures and Technical Specifications review to assure that post-maintenance operability testing of all safety-related equipment is required to be conducted and that the testing demonstrates that the equipment is capable of performing its safety functions before being returned to service.
2. Licensees and applicants shall submit the results of their check of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications where required.

Documentation Required

Licensees and applicants should submit a statement confirming that actions 3.2.1 and 3.2.2 of the above position have been implemented.

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Discussions with your staff in December 1987 did not result in assurance that the requirements as stated in GL 83-28 had been satisfied. Our staff has reviewed previous correspondence regarding the GL items; TED Procedure No. AD1844.00, "Conduct of Maintenance"; and portions of the System Review and Test Program (SRTP). The procedure and the SRTP did not appear to be related to the post-maintenance items in the Generic Letter. Your letter dated December 18, 1987 (Serial No. 1454), described your configuration management program and proposed a schedule for completion of specific tasks. One task was that of a vendor technical manual review to be completed by October 31, 1988, and that the vendor test recommendations be incorporated into surveillance and periodic test procedures by February 29, 1989. This task may partially satisfy GL item 3.2.2; however, the letter refers to "surveillance and periodic test procedures," and does not specifically state that maintenance procedures are included as part of the task.

According to the generic letter, you are required to submit a report documenting your actions regarding item 3.2.1, and to submit your results from item 3.2.2. We suggest that these submittals restate your original commitments; respond to each in sufficient detail, specifically focusing on the GL issues (i.e., post-maintenance testing); and document completion or schedules for completion. Your response should address the following:

1. Regarding item 3.2.1:
 - a. Review of plant test and maintenance procedures and Technical Specifications, ensuring post-maintenance operability testing of all safety-related components is required. Include a description of all changes implemented as a result of the review.
 - b. Review of methods for performing functional testing of structures, systems, and components, following maintenance, to demonstrate that equipment is capable of performing its safety functions prior to being returned to service. Include a description of all changes implemented as a result of the review.
 - c. Criteria and responsibilities for review and approval of maintenance, and for performing inspections of post-maintenance testing activities.
2. Regarding item 3.2.2:
 - a. Review of vendor-recommended test guidance.
 - b. Review of engineering recommendations.
 - c. A description of changes implemented to ensure that vendor and engineering recommendations are included in test and maintenance procedures, or the Technical Specification, where required.

Mr. Donald C. Shelton

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To maintain our review schedule, the information requested above for items 3.2.1 and 3.2.2 should be submitted not later than October 15, 1988.

This request for additional information was approved by the Office of Management and Budget under the control number 3150-0011 which expires September 30, 1989. Comments on burden and duplication may be directed to the Office of Management and Budget, Reports Management, Room 3208, New Executive Office Building, Washington, D.C. 20503.

Sincerely,

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