



A Centenor Energy Company

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Docket No. 50-346

License No. NPP-3

Serial No. 1590

September 29, 1988

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

Subject: Station Review Board Review of Instrumented Inspection Technique
Test Procedures

Gentlemen:

The H.A.F.A. International Incorporated Topical Report [HAFA 135 (P-A)], "Instrumented Inspection Technique as an Alternative to the Hydrostatic Testing Requirements for ASME Class 1, 2, and 3 Systems and Components" dated December 1985, was approved by the NRC on November 7, 1985. Toledo Edison is utilizing this alternative test method for several post modification tests as described in Serial Nos. 1486 and 1582 previously submitted to NRC. The H.A.F.A. Topical, Paragraph 4.2 states, "The systems on which the pressure tests are to be performed are evaluated for application of IIT and the test procedures are submitted to the Utility Safety Review Board and Quality Assurance for approval." When the Topical was issued the Davis-Besse procedure review and approval process included the Station Review Board.

Toledo Edison submitted a License Amendment Request in January 1986 which was later issued as Amendment Number 109 to the Davis-Besse Technical Specifications. This License amendment requires that the technical review of procedures be performed by "qualified reviewers" rather than through a routine SRB technical procedure review. Toledo Edison considers that the H.A.F.A. Topical statement regarding SRB technical procedure reviews is superseded by the requirements of the new Amendment to the Technical Specifications.

Therefore, Toledo Edison will approve the IIT procedures utilizing the present "qualified reviewer" process required by the Technical Specifications rather than SRB review and approval. The Quality Assurance review of these procedures was not affected by License Amendment Number 109.


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Docket No. 50-346
License No. NPF-3
Serial No. 1590
Page 2

If there are any questions, please contact Mr. R. W. Schrauder, Nuclear
Licensing Manager, at (419) 249-2366.

Very truly yours,



GBK:dln

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