



A Centenor Energy Company

DONALD C. SHELTON
Vice President - Nuclear
(419) 249-2300

Docket No. 50-346

License No. NPF-3

Serial No. 1598

October 14, 1988

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

Subject: Response to Request for Additional Information (RAI) Regarding
Generic Letter 83-28 Items 3.2.1 and 3.2.2 (TAC 53748)

Gentlemen:

In response to the subject RAI, Toledo Edison (TE) reviewed previous correspondence related to Generic Letter (GL) 83-28 Item 3.2 and other related documentation. TE believes the method of resolving this item may have been difficult to comprehend since several GL 83-28 tasks were integrated into one review effort. The review and action taken in response to GL 83-28 Item 3.2 was further complicated when TE integrated this effort with the Davis-Besse System Review and Test Program (SRTP) problem and test review phase.

With regard to GL 83-28 Item 3.2.2 status, TE recently completed the Configuration Management Program (CMP) task for vendor technical manual review and has incorporated vendor test recommendations into Davis-Besse procedures where appropriate. This CMP task has been transitioned into an ongoing program which is implemented by Engineering Procedure NEP-041. NEP-041 requires the identification of vendor operation, maintenance, and/or test recommendations, review of Davis-Besse documents requiring changes (e.g., drawings, specifications, procedures, etc.), and the initiation of changes in accordance with appropriate procedures.

Subsequent to Mr. DeAgazio's December, 1987, discussion with TE staff (referenced in your letter of September 14, 1988), NRC Region III inspected TE's implementation of GL 83-28 commitments. This inspection was documented in Inspection Report No. 50-346/88011 dated May 10, 1988. The inspector, after a review of post maintenance testing and vendor interface programs at Davis-Besse, concluded these programs adequately addressed GL 83-28 requirements.

8810250292 881014
PDR ADOCK 05000346
PNU

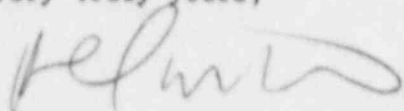
A055
11

Docket No. 50-346
License No. NPF-3
Serial No. 1598
Page 2

Enclosed is a detailed discussion of the results of TE's review and response to GL 83-28 Items 3.2.1 and 3.2.2, as requested by NRC Letter dated September 14, 1988.

If you have any questions regarding this response, please contact Mr. R. W. Schrauder, Nuclear Licensing Manager, at (419) 249-2366.

Very truly yours,



EBS/dlm

Attachment

cc: P. Byron, DB-1 NRC Resident Inspector
A. W. DeAgazio, DB-1 NRC Senior Project Manager
A. B. Davis, Regional Administrator, NRC Region III

NRC Request for Additional Information Regarding Item 3.2.1:

NRC Item 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.

TE Response

In TE's initial response to GL 83-28, Serial No. 1000 dated November 7, 1983, TE stated that the Item 3.2.1 review effort would be integrated into the Item 3.2.2 review and response. Serial No. 1060 dated July 31, 1984, advised the NRC that an interdivisional task force was reviewing Davis-Besse's overall vendor information control program to ensure consistency and proper interface among the design, construction, and operating organizations. With regard to Items 2.2.2 and 3.2, TE advised that the the task force was specifically addressing; 1) the effectiveness of the internal handling of vendor information related to safety-related equipment and 2) post-maintenance testing requirements related to technical requirements, safety function demonstration and test guidance adequacy. TE stated that additional enhancements and actions to be taken in response to GL 83-28 Items 2.2.2 and 3.2 would be identified by January 18, 1985.

On January 18, 1985, in Serial No. 1114, TE provided status and long range plans and schedules for implementing actions required by GL 83-28 Items 2.2.2 and 3.2. Serial No. 1114 included a detailed discussion of post-maintenance testing requirements at Davis-Besse and a description of specific enhancements made to the administrative procedure controlling maintenance to ensure its responsiveness to GL 83-28 Items 2.2.2 and 3.2. At that time, TE's post-maintenance testing program for "other" safety related components was administratively controlled by the same procedure (AD 1844.00, Revision 9) as the one used to control maintenance for "Reactor Trip System (RTS) components." As documented in an NRC Safety Evaluation Report (Log No. 1848) dated October 24, 1985, the NRC found TE's post-maintenance testing program for RTS components (GL 83-28 Item 3.1.1) acceptable.

At the time of TE's initial response, Davis-Besse Administrative Procedure AD 1844.00, "Maintenance", required that post-maintenance testing, which describes the method of proving operability, be performed on all safety related equipment subsequent to maintenance. As stated above (Serial 1114), specific enhancements were made to AD 1844.00 to ensure its responsiveness to GL 83-28. These enhancements included:

- 1) All nuclear safety related work shall be accomplished through the use of appropriate procedures, reviewed by the Station Review Board (SRB), and approved by the Plant Manager.

- 2) Testing requirements established by the Maintenance Work Order (MWO) originator are reviewed for adequacy by an Operations Department staff person, who presently holds or has held a Senior Reactor Operator (SRO) license at D-B, prior to performance of the test. The Shift Supervisor (also a licensed SRO) reviews testing requirements upon completion of maintenance prior to returning equipment to service.

Currently, the procedure which requires post-maintenance testing and that controls maintenance and modification work at Davis-Besse is AD 1844.02, "Control of Work." AD 1844.00 establishes the administrative controls, and responsibilities and duties of personnel conducting maintenance activities at Davis-Besse. (Also, see response to NRC Item 1.c below.)

An NRC Region III inspector inspected D-B's post maintenance testing program to verify compliance with GL 83-28 commitments in April, 1988. NRC Inspection Report No. 50-346/880.1 documents the adequacy of post maintenance testing requirements at D-B.

NRC Item 1.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.

TE Response

TE advised the NRC by letter dated October 11, 1985 (Serial No. 1195) that the System Review and Test Program (SRTP) would be utilized to meet the requirements of GL 83-28, Item 3.2.2 and 3.2.3 (and as previously stated Item 3.2.1 work was integrated into Item 3.2.2 work). The purpose of SRTP was to ensure that existing testing, used to verify proper functioning of safety-related systems, was adequate. This, coupled with enhancements to the post maintenance testing program (partially described in response to NRC Item 1.a above), ensures that post maintenance testing of safety-related components demonstrates that the equipment is capable of performing its safety function. In addition to the SRO and Shift Supervisor review described above, AD 1844.11 directs the MWO originator to consult with the Post Maintenance Testing Manual and cognizant System Engineers, as needed, when developing post maintenance testing requirements. AD 1844.11 also directs Systems Engineering to periodically review and submit revisions and additions to the Post Maintenance Testing Manual.

On November 5, 1986, (Serial No. 1299) TE advised the NRC of the results of the SRTP for Davis-Besse in relation to GL 83-28 Item 3.2. The SRTP included a review of surveillance tests (normally specified for post maintenance testing to verify operability), periodic tests and one time tests to ensure that all system functions important to safe plant operation were adequately addressed. Test procedure deficiencies were identified and resolved by either modifying existing tests or developing new tests.

As documented in NRC Inspection Report (IR) 50-346/85039 dated March 18, 1986, and IR 50-346/86030 dated March 18, 1987, inspectors reviewed and observed technical specification required surveillance testing, periodic testing, and one-time performance testing which were utilized to verify functional operability of safety-related systems. The IR documents the acceptability of the tests or the planned resolution of identified test deficiencies. The Davis-Besse Restart Safety Evaluation Report (SER) states that the SRTP was designed to provide a comprehensive evaluation and functional demonstration of systems included within the scope of the SRTP. Further, it states that the program was intended to identify and rectify problems that could affect the ability of the systems to perform their intended function. Additionally, the program was intended to address equipment maintenance related concerns.

The SRTP review addressed the adequacy of existing surveillance tests, periodic tests, and one-time tests. The current post maintenance testing program ensures these tests and other tests are appropriately designated and are adequate for post maintenance testing. A description of changes implemented as a result of the SRTP review was previously provided to the NRC during NRC Inspection 50-346/86030. Therefore, TE believes no further action is necessary for GL 83-28 Item 3.2.1.

NRC Item 1.c

Criteria and responsibilities for review and approval of maintenance, and for performing inspections of post-maintenance testing activities.

Response to Item 1.c

Procedure AD 1844.00, "Conduct of Maintenance," establishes the administrative controls, and responsibilities and duties of personnel conducting maintenance activities at Davis-Besse (D-B). All maintenance tasks performed on plant equipment are administratively controlled by AD 1844.02 (DB-PN-00007), "Control of Work." AD 1844.02 provides the procedural criteria for when and how post maintenance/modification tests are to be stipulated. During the work planning phase of an MWO, AD 1844.02 directs that a review for pre or post maintenance testing occur and directs the MWO planner to AD 1844.11. The criteria for performing inspections of post-maintenance testing activities is included in AD 1844.02. DB-MN-00008 (AD 1844.11), "Premaintenance and Post-maintenance Testing Requirements", establishes the requirements for the performance and provides guidance for the determination of premaintenance and post maintenance testing requirements.

Regarding Item 3.2.2

NRC Item 2 a, b & c

Review of vendor-recommended test guidance. Review of engineering recommendations. A description of changes implemented to ensure that vendor and engineering recommendations are included in test and maintenance procedures, or the Technical Specifications, where required.

TE Response

In Serial No. 1192, dated October 11, 1985, TE advised the NRC that the GL 83-28, Item 3.2.2 requirement to include vendor recommended test guidance in test and maintenance procedures (as appropriate) would be included in the scope of the TE Configuration Management Program (CMP). In that letter TE stated that vendor test recommendations would be incorporated into surveillance and periodic test procedures as appropriate. The SRTP was used as a mechanism for ensuring that engineering recommendations were appropriately considered and included in surveillance and periodic test procedures. The most recent schedule for completion of the CMP task was provided in Serial No. 1454 dated December 18, 1987. TE advised the NRC, by letter dated November 5, 1986 (Serial No. 1299), that the portion of SRTP related to GL 83-28 Item 3.2 was complete.

TE recently completed the CMP review of the backlog of Vendor Technical Manuals (VTMs), identified vendor test recommendations, evaluated the test recommendations, and where appropriate incorporated or initiated a change to incorporate test recommendations into appropriate procedures.

Procedure NEP-041, "Vendor Manuals," establishes the requirements for ensuring that vendor recommendations are included in test and maintenance procedures or Technical Specifications, where required. The periodic review process for procedures ensures that engineering recommendations are incorporated into appropriate procedures on an ongoing basis.