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Docket Number 50-346

License Number NPF-3

Serial Number 1-1132

July 25, 1997

United States Nuclear Regulatory Commission
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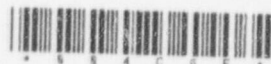
Subject: Revision of Responses to NRC Inspection Report Numbers 50-346/96014 and
50-346/97003

Ladies and Gentlemen:

On April 4, 1997, Toledo Edison (TE) submitted a response (Serial Number 1-1122) to Nuclear Regulator Commission (NRC) Inspection Report (IR) Number 50-346/96014. A response to IR Number 50-346/97003 (Serial Number 1-1125) was submitted on May 9, 1997. Revisions to the schedule and actions in response to these IRs are discussed below.

On December 13, 1996, TE submitted License Event Report (LER) 96-009 for failure to apply the guidance of Generic Letter (GL) 91-18, "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Non-Conforming Conditions and on Operability," with regard to the operability of the Emergency Diesel Generators while synchronized to the grid during surveillance testing. On February 25, 1997, the NRC issued Inspection Report 50-346/96014, which issued a Notice of Violation (NOV) for failure to record in the Unit Log, the entry and exit of a Technical Specification Action Statement. As a result of these two occurrences, TE initiated a program to review all plant procedures, including surveillance procedures, which alter plant equipment, for any condition which renders a Safety System incapable of performing its intended safety function. In Serial Number 1-1122, TE stated that this review of procedures was expected to be complete by July 25, 1997. To allow for final evaluation of this review of all plant procedures, the review completion date is being extended to August 29, 1997.

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In IR 50-346/96014, a NOV was issued to TE for violation of procedure compliance requirements. In our response to this IR (Serial Number 1-1122), TE identified that procedure usage requirements described in DB-OP-00000, "Conduct of Operations," were not completely consistent with the requirements found in DB-DP-00013, "Surveillance and Periodic Test Program." Toledo Edison committed to evaluate DB-OP-00000 and DB-DP-00013 for inconsistencies by May 30, 1997. Procedure alterations identified by this review were to be completed and personnel involved in surveillance testing were to be trained on these procedure changes by July 31, 1997. These actions were reiterated in the TE response (Serial Number 1-1125) to Inspection Report Number 50-346/ 97003 dated May 9, 1997, which contained another NOV of procedure compliance requirements.

In Serial Number 1-1125, TE stated, "The management staff has initiated efforts to evaluate the adequacy and consistency of policies and procedures that establish the requirements and expectations for procedure compliance. Due to the forced plant outage that began with the plant trip on May 4, 1997, management attention was diverted to the safe conduct of this outage. As a result, in order to complete a comprehensive review, the results of this evaluation, along with the identified action plans, will be provided by June 27, 1997." This review, which broadened the scope of review beyond that of the procedures DB-OP-00000 and DB-DP-00013, was conducted by Plant Operations and Plant Engineering personnel. Results were provided to the Managers of Plant Operations and Maintenance.

The results of this evaluation identified the following issues:

- There are differing or insufficient requirements between departments with regard to the process and approval requirements for determination when a procedure step may not be applicable to the evolution being performed.
- Requirements between departments with regard to performance of procedure steps in sequence and the approval required to deviate from the written sequence are inconsistent.
- Written requirements are insufficient within some departmental administrative procedures with regard to resolution of procedural deficiencies.

The primary area of concern, as a result of this review, is that when procedures written by one department are then performed by another department, conflicting guidance for the identified issues may result in mis-application of the requirements.

As a result of the broader review of the adequacy and consistency of site-wide policies and procedures for procedure usage, revisions will be made to the affected site-wide policies and procedures. In TE Serial 1-1122, Toledo Edison originally committed to complete procedure changes identified in the review of DB-OP-00000 and DB-DP-00013 and train personnel

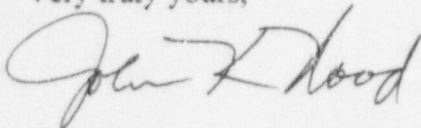
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involved in surveillance testing by July 31, 1997. This commitment is being revised to complete procedure changes to resolve the issues identified by the broader scope review and train the affected personnel by October 31, 1997.

As an interim action, presentations were made to plant personnel by management to reaffirm expectations for procedure usage. The site policy, "Procedure Use and Compliance," was revised and sent to all site personnel on June 9, 1997.

Should you have any questions or require additional information, please contact Mr. James L. Freels, Manager - Regulatory Affairs, at (419) 321-8466.

Very truly yours,

A handwritten signature in cursive script, appearing to read "John F. Hood".

DLM/laj

cc: A. B. Beach, Regional Administrator, NRC Region III
A. G. Hansen, DB-1 NRC/NRR Project Manager
S. Stasek, DB-1 NRC Senior Resident Inspector
Utility Radiological Safety Board