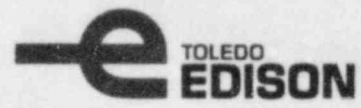


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Docket No. 50-346

License No. NPF-3

Serial No. 1-636

May 23, 1986

JOE WILLIAMS, JR.
Senior Vice President—Nuclear
(419) 249-2300
(419) 249-5223

W. G. Guldemon, Chief
Division of Reactor Projects
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Guldemon:

Toledo Edison acknowledges receipt of your April 18, 1986 letter (Log No. 1-1373), Notice of Violation, and Inspection Report No. 50-346/86005 (DRP). Based upon our discussion with Mr. D. Kosloff on April 24, 1986, it was determined that a written response was only required for Violation 2 and that no reply to Violation 1 was necessary. Additionally, in accordance with our discussion with Mr. I. N. Jackiw on May 19, 1986, we were granted an extension for this response until May 23, 1986. Following an examination of the item of concern, Toledo Edison herein offers information regarding this item:

Violation : 10 CFR 50.71 requires that annual Final Safety Analysis Report (FSAR) revisions shall reflect all changes to the facility up to a maximum of six months prior to the date of filing.

- (a) Contrary to the above, the July 1984, annual revision of the FSAR was found not to reflect an extensive series of modifications to the pressurizer code safety relief valves completed on July 30, 1982.
- (b) Contrary to the above, in February of 1986, following the July 1985 annual submittal, the FSAR was found not to reflect an extensive facility modification to the service water pump room's ventilation system completed on September 11, 1984.

This is a Severity Level IV Violation (Supplement I).
(50-346/86005-02)

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Response: (1) Corrective action taken and the results achieved

Appropriate changes have been made to the Davis-Besse Updated Safety Analysis Report (USAR) to reflect the modifications to the pressurizer code safety relief valves. These changes were included in Revision 3 to the USAR submitted July 16, 1985 (Serial No. 1165).

FCR 81-054 will be reviewed and the appropriate changes will be incorporated in the 1986 revision of the USAR to reflect the modification to the Service Water Pump Room Ventilation System.

The Station Document Control Department has identified the FCRs for modifications considered to be completed (system is considered operable) but which have not yet reached implementation status in the Davis-Besse Maintenance Management System (DBMMS) due to minor work remaining or minor deficiencies being identified. These FCRs have been included in the data base for Revision 4 of the USAR and will be reviewed for incorporation into the USAR as appropriate.

(2) Corrective action to be taken to avoid further violations

The current Toledo Edison USAR revision process relies on timely Station implementation of Facility Change Requests (FCRs) in order for identification of the data base of those FCRs to be included in the next annual revision of the USAR. For those FCRs which are not fully implemented due to minor work remaining or minor deficiencies which do not affect the actual function of the structure, system or component, the trigger point for notifying Licensing is not reached and the FCR is not identified as a potential input for the next annual USAR revision.

Toledo Edison is currently developing site wide (Nuclear Mission) procedures for the USAR revision process (NMP-SL-806) and the plant modification process (NMP-NE-301). The Nuclear Mission procedure for the plant modification process will be significantly different in comparison to the previous Facility Change Request process. Toledo Edison's intent is to provide a more streamlined approach to plant modifications in order to ensure more timely completion.

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These procedures will also establish a more appropriate trigger point for identifying when plant modifications should be incorporated into the data base for the next annual USAR revision. For existing FCRs which will remain when the new plant modification process becomes effective, the interim process of identifying those FCRs considered completed but not fully implemented will be utilized in the USAR revision process.

- (3) The date when full compliance will be achieved

Appropriate changes will be incorporated in the USAR to reflect the modification to the Service Water Pump Room Ventilation System by July 22, 1986.

The Nuclear Mission procedures for the USAR revision process and the plant modification process will be approved by November 1, 1986.

Very truly yours,

Joe Williams Jr. /ABA

JW:TJB:plf

cc: DB-1 NRC Resident Inspector